

APPENDIX F3: SAMPLE FRAUD POLICY RESPONSIBILITY MATRIX

This sample matrix can be used as a tool to summarize and visualize the fraud risk governance responsibilities that have been defined for the organization. Entries shown are for example only.

Action Required	Board	Exec Mgmt.	Mid / Line Mgmt.	Risk Mgmt.	Legal	Internal Audit	Fin/ Acctg.	FIU*/ Corp. Security	HR / Employee Relations	PR	IT	BU**/ Line Personnel
1. Fraud Risk Management Oversight	P											
2. Code of Conduct / Fraud Control Policy		P										
3. Fraud Prevention Controls (Process Level)		P	SR	S	S	S	S	S	S	S	S	S
4. Fraud Risk Assessment		P	S	S	S	S	S	S	S	S	S	S
5. Fraud Detection Controls (Process Level)		P	SR	S	S	S	S	S	S	S	S	S
6. Fraud Education / Training and Awareness		S			S	S		P	SR			
7. Hotline / Ethics Line					P	S		S	S			
8. Reporting of Concerns / Complaints / Violations	SR	SR	SR	SR	SR	SR	SR	SR	SR	SR	S R	SR
9. Evaluation of Reported Incidents					P	S		SR	S		S	
10. Fraud / Misconduct Investigations	S				SR	S		P	S		S	
11. Whistleblower Follow-Up					SR			P				
12. Referral to Law Enforcement					S			P				
13. Regulatory Self-Disclosure	S	P			SR							
14. Civil Litigation					P			S				
15. Asset Recovery					S			P				
16. Monitor Recoveries							P	S				
17. Disciplinary Action			SR		S				SR			
18. Remediation / Corrective Action		S	SR	S	S	SR	S	SR	S		S	
19. Fraud Prevention / Detection Recommendations	S	S	S	S	S	SR	S	SR	S	S	S	S
20. Publicity / Press Releases		S			S					P		
21. Proactive Fraud Auditing						P	S					
22. Internal Controls Review						P						
23. Case Analysis						S		P				
24. Fraud Risk Reporting		P	S	S	S	S	S	SR	S		S	
25. Fraud Risk Management Framework Assessment		SR				P						

P (Primary Responsibility) S (Secondary Responsibility) SR (Shared Responsibility)

* Fraud Investigation Unit; ** Business Unit