



### ***Employee Fraud. Embezzlement. Workplace harassment or injury.***

*These unfortunate events are costly for financial institutions – both reputationally and financially. Internal fraud can cost a financial institution thousands or millions of dollars, along with damaged brand reputation. Claims and lawsuits are damaging to the bottom line, tainting culture and diverting morale.*

*Financial institutions that maintain proper controls can go a long way to reduce claims and losses, while maintaining a positive work culture and reducing vulnerability to misuse of organizational data and funds.*

*Answer the following questions to help you better understand any areas of vulnerability related to internal fraud.*



## **POLICY & COMPLIANCE OVERSIGHT**

Focus: Legal guidance, regulatory adherence, and organizational policy setting

### ***Does your financial institution...***

|                                                                                                             |     |    |        |
|-------------------------------------------------------------------------------------------------------------|-----|----|--------|
| Consult with legal counsel for strategic but compliant surveillance camera placement?                       | Yes | No | Unsure |
| Regularly meet with internal and external auditors to review controls and anti-fraud measures?              | Yes | No | Unsure |
| Know your states' stances on cannabis-related products and clearly define employee usage policies?          | Yes | No | Unsure |
| Work with legal advisors to provide a comprehensive definition of discrimination?                           | Yes | No | Unsure |
| Ensure your harassment policies identify all groups protected under applicable state and local laws?        | Yes | No | Unsure |
| Require that legal advisors review any policy addressing harassment and discrimination before distribution? | Yes | No | Unsure |
| Use a third party to perform:                                                                               |     |    |        |
| • Criminal background checks                                                                                | Yes | No | Unsure |
| • Credit checks                                                                                             | Yes | No | Unsure |
| • Work and education verification                                                                           | Yes | No | Unsure |
| • Drug testing for all new hires                                                                            | Yes | No | Unsure |

## PEOPLE & WORKPLACE SAFETY

Focus: Harassment prevention, workplace injury, and cultural reinforcement

***Does your financial institution...***

|                                                                                                |     |    |        |
|------------------------------------------------------------------------------------------------|-----|----|--------|
| Proactively encourage safe work habits to reduce workers' compensation claims?                 | Yes | No | Unsure |
| Establish a plan to provide prompt medical attention in case of injury?                        | Yes | No | Unsure |
| Identify patterns in workers' compensation claims to target high-risk areas?                   | Yes | No | Unsure |
| Work with injured employees to facilitate a timely return-to-work (e.g., transitional duties)? | Yes | No | Unsure |
| Frequently remind employees to report harassment they observe or experience?                   | Yes | No | Unsure |
| Provide clear, easy-to-understand instructions for harassment reporting, free of retaliation?  | Yes | No | Unsure |
| Offer regular training on harassment and discrimination policies for:                          |     |    |        |
| • Employees?                                                                                   | Yes | No | Unsure |
| • Volunteers?                                                                                  | Yes | No | Unsure |
| • Committee members?                                                                           | Yes | No | Unsure |
| • Board of directors?                                                                          | Yes | No | Unsure |

## FRAUD PREVENTION CONTROLS

Focus: Operational practices to deter, detect, and respond to internal fraud and embezzlement

***Does your financial institution...***

|                                                                     |     |    |        |
|---------------------------------------------------------------------|-----|----|--------|
| Conduct surprise cash counts for teller drawers?                    | Yes | No | Unsure |
| Practice dual control for currency shipments and vault cash access? | Yes | No | Unsure |
| Apply FIFO (First-In, First-Out) practices for vault inventory?     | Yes | No | Unsure |
| Prohibit drawer keys from being left in the building overnight?     | Yes | No | Unsure |
| Replenish teller drawers and ATMs under dual control?               | Yes | No | Unsure |
| Segregate duties such as:                                           |     |    |        |
| • Balancing and replenishing?                                       | Yes | No | Unsure |
| • Loan approval and disbursement?                                   | Yes | No | Unsure |
| Frequently inventory blank card stock?                              | Yes | No | Unsure |
| Audit and maintain oversight of:                                    |     |    |        |
| • Dormant accounts?                                                 | Yes | No | Unsure |
| • Blank card stock (credit, debit, ATM, prepaid)?                   | Yes | No | Unsure |
| Rotate duties to prevent cover-ups of fraudulent activity?          | Yes | No | Unsure |

## FRAUD PREVENTION CONTROLS *continued*

Focus: Operational practices to deter, detect, and respond to internal fraud and embezzlement

***Does your financial institution...***

Maintain clear policies for:

- |                                            |     |    |        |
|--------------------------------------------|-----|----|--------|
| • Use of corporate credit cards?           | Yes | No | Unsure |
| • Reimbursement of out-of-pocket expenses? | Yes | No | Unsure |

|                                                |     |    |        |
|------------------------------------------------|-----|----|--------|
| Reconcile the corporate check account monthly? | Yes | No | Unsure |
|------------------------------------------------|-----|----|--------|

|                                                                                         |     |    |        |
|-----------------------------------------------------------------------------------------|-----|----|--------|
| Verify new vendors monthly and retain supporting invoices to deter fraudulent payments? | Yes | No | Unsure |
|-----------------------------------------------------------------------------------------|-----|----|--------|

|                                                            |     |    |        |
|------------------------------------------------------------|-----|----|--------|
| Provide employees with resources to report fraud or theft? | Yes | No | Unsure |
|------------------------------------------------------------|-----|----|--------|

|                                                                                   |     |    |        |
|-----------------------------------------------------------------------------------|-----|----|--------|
| Investigate accountholder complaints about suspicious employee behavior promptly? | Yes | No | Unsure |
|-----------------------------------------------------------------------------------|-----|----|--------|

Provide annual fraud training for:

- |                  |     |    |        |
|------------------|-----|----|--------|
| • Employees?     | Yes | No | Unsure |
| • Management?    | Yes | No | Unsure |
| • Board members? | Yes | No | Unsure |

## TECHNOLOGY & ACCESS SECURITY

Focus: System-level controls and digital safeguards to prevent unauthorized access and manipulation

***Does your financial institution...***

|                                                                                    |     |    |        |
|------------------------------------------------------------------------------------|-----|----|--------|
| Require complex passwords and multi-factor authentication (MFA) for system access? | Yes | No | Unsure |
|------------------------------------------------------------------------------------|-----|----|--------|

|                                                                            |     |    |        |
|----------------------------------------------------------------------------|-----|----|--------|
| Combine dual control key systems with biometric access for teller drawers? | Yes | No | Unsure |
|----------------------------------------------------------------------------|-----|----|--------|

|                                                               |     |    |        |
|---------------------------------------------------------------|-----|----|--------|
| Audit system logs regularly for unauthorized access attempts? | Yes | No | Unsure |
|---------------------------------------------------------------|-----|----|--------|

|                                                 |     |    |        |
|-------------------------------------------------|-----|----|--------|
| Patch and update systems on a regular schedule? | Yes | No | Unsure |
|-------------------------------------------------|-----|----|--------|

|                                                        |     |    |        |
|--------------------------------------------------------|-----|----|--------|
| Monitor employee access to sensitive systems and data? | Yes | No | Unsure |
|--------------------------------------------------------|-----|----|--------|

Review your responses to identify areas of confidence and those needing further investigation.

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