

Procedure Title  
**INVESTIGATION**

**1. GENERAL**

The investigation is the careful search for evidence or evidence to reconstruct a fact such as fraud, attempted fraud or any other incident prejudicial to the institution. Its purpose is to trace the chronological sequence of events, to identify and qualify the failures of the risk management system at the origin of the event and to establish individual responsibilities.

**2. MANAGEMENT RULES**

The fact-finding mission can be carried out at the request of the General Management, following an alert received from the Compliance and Permanent Control or Operations Department. Similarly, the initiative to organize an investigation mission can come from the Directorate of Audit and Inspection after analysis of suspicious facts.

Depending on the occurrence of the incident, the investigative mission may require the collaboration of clients and / or other partners of the CNCAS

**3. STEPS IN THE PROCEDURE**

- Riggering the mission;
- Preliminary investigations ;
- Interview with the responsible unit manager (on site)
- thorough investigations

**4. LIST OF WORKING DOCUMENTS**

- Engagement letter
- Accounting supports
- Requests for information
- Interview report

**5. ACTORS OF THE PROCEDURE**

- The Director of Audit and Inspection
- The chef de mission
- The listener
- The head of the unit concerned

**6. MAIN RISKS OF THE PROCESS**

- No identification of fraudsters
- Misjudgment of injury
- Incorrect assessment of the failures that led to the incident

## **7. PROCEDURE**

### **7.1.Triggering the Procedure**

- Upon receipt of a request for investigation by the General Management or any other entity, the Audit and Inspection Division first assesses the relevance of the intervention.
- If he deems it useless to organize an investigation mission, he will dismiss the case
- If it deems it appropriate to respond to this request for alert, it constitutes a team that will be responsible for carrying out this mission
- He convenes the members of the team of inspectors for a meeting of information and restitution of any available information on the case or the subject
- divide the tasks of the preliminary investigations and set a deadline for each member of the team

### **7.2.Preliminary investigations**

- inspectors in charge of investigations, collect useful information
- they make an initial analysis of the information received and place it in a folder open for this purpose
- On the occasion of a second meeting with the Audit and Inspection Division, the inspectors present to him the results of their researches as well as the analyzes made to harmonize the positions of the ones and the others before the displacement on the site
- After sharing the information collected at the preliminary investigation, the Audit and Inspection Division sets the date of the on-site trip

**NB:** If the mission is urgent, the choice of the date of the mission can be done just after the information session

### **7.3.Interview with the Unit Manager concerned**

- The continuation of this stage is left to the discretion of the Chef de Mission
- The head of mission presents to the Head of Unit the object and the scope of the mission

it also presents :

- a list of documents to exploit
- a list of agents to interview

The unit manager installs the inspectors, puts them at their disposal and provides them with all the requested information available

### **7.4.In-depth investigations**

- Upon receipt of the requested information, the team of inspectors divides the tasks and proceeds to the analysis of the documents
- defines the list of agents to be interviewed according to the results of the analysis and informs the unit manager

- Interview with pre-listed agents
- Establish a Minutes signed by all parties (Inspectors, Interviewed Agent and Head of Unit)
- If the responsibility of an agent is engaged, the head of mission transmits the information to the Audit and Inspection Division and requests the suspension of the authorizations of the agent
- the chef de mission sends a request for explanation to the offending agent and fixes a response time
- the mission analyzes and classifies the agent's response in the mission file
- Depending on the damage and with the authorization of the Director General, a complaint is lodged by the Audit and Inspection Division with the competent authorities
- the Audit and Inspection Division seizes the insurer of the bank for coverage of the damage suffered
- Audit and Inspection Division appeals to Bank Counsel for follow-up on court file

## **8. KEY CONTROLS**

- Authentication of the documents provided
- Verification of information