Red Flags for Fraud

Red flags are indicators that fraudulent activity could exist; they are not absolute, but should be investigated to ensure fraudulent activity is not present. This exhibit is only a guide and not to be construed as an all-encompassing list.

Red Flags for Corruption

- 1. An organization paying more than the best price available.
- 2. Very specific requirements that tend to favor one bidder.
- 3. Projects that are broken into two contracts to circumvent review limits or approval authority.
- 4. Very narrow time frame for companies to submit bids.
- 5. A too-successful bidder who is consistently winning bids.
- 6. Social contact between the bid solicitors and bidders.
- 7. Lower quality goods from a new vendor.
- 8. A procurement officer living beyond their means.

<u>Factors that detract from a Positive Work Environment and could provide motive to</u> commit Fraud

- 1. Executive management does not appear to care about or reward good behavior.
- 2. Negative feedback and lack of recognition for job performance.
- 3. Perceived inequities in the organization.
- 4. Autocratic rather than participative management.
- 5. Low organizational loyalty or feelings of ownership.
- 6. Unreasonable budget expectations or other financial targets.
- 7. Fear of delivering "bad news" to supervisors and/or management.
- 8. Less than competitive compensation.
- 9. Poor training and promotional opportunities.
- 10. Lack of clear organizational responsibilities.
- 11. Poor communication practices or methods within the organization.

Employee Red Flags

- 1. Employee lifestyle changes: expensive cars, jewelry, homes, clothes, etc.
- 2. Significant personal debt and credit problems.
- 3. Behavioral changes indicating possible drug, alcohol, gambling addiction, or fear of losing job.
- 4. High employee turnover, especially in areas vulnerable to fraud.
- 5. Refusal to take vacation or leave.
- 6. Lack of segregation of duties.

Management Red Flags

- 1. Reluctance to provide information to auditors.
- 2. Frequent disputes with auditors.

- 3. Decisions are dominated by an individual or small group.
- 4. Lack of clear organizational responsibilities.
- 5. Disrespect for regulatory bodies.
- 6. A weak internal control environment.
- 7. Accounting personnel are lax or inexperienced in their duties.
- 8. Decentralization without adequate monitoring.
- 9. Excessive number of checking accounts.
- 10. Frequent changes in banking accounts.
- 11. Frequent changes in external auditors.
- 12. Continuous rollover of loans.
- 13. Excessive number of year end transactions.
- 14. High employee turnover.
- 15. Rumors of conflicts of interest, nepotism, breach of duty, and/or favoritism.
- 16. Unexpected overdrafts or declines in cash balances.
- 17. Refusal by organization or division to use serial numbered documents.
- 18. Compensation program that is out of proportion.
- 19. Financial transactions that do not make sense.
- 20. Service contracts resulting in no product.
- 21. Photocopied or missing documents.

Red Flags in Cash/Accounts Receivable

- 1. Excessive number of voids, discounts, and returns.
- 2. Unauthorized bank accounts.
- 3. Sudden activity in dormant bank accounts.
- 4. Customer complaints they are receiving non-payment notices.
- 5. Discrepancies between bank deposits and postings.
- 6. Abnormal number of expense items, supplies, or reimbursement to an employee.
- 7. Presence of employee checks in the petty cash for the employee in charge of petty cash.
- 8. Excessive or unjustified cash transactions.
- 9. Large number of write-offs of accounts.
- 10. Bank accounts that are not reconciled on a timely basis.

Red Flags in Payroll

- 1. Inconsistent overtime hours.
- 2. Overtime charged during a slack period.
- 3. Overtime charged for employees who normally would not have overtime wages.
- 4. Budget variations for payroll.
- 5. Employees with duplicate social security numbers, names, and/or addresses.
- 6. Employees with few or no payroll deductions.

Red Flags in Purchasing/Inventory

- 1. Increasing number of complaints for products and services.
- 2. Abnormal inventory shrinkage.
- 3. Lack of physical security over assets/inventory.
- 4. Charges without shipping documents.
- 5. Payments to vendors who are not on the approved vendor list.
- 6. Payments to vendors using duplicate invoices.
- 7. High volume of purchases from new vendors.
- 8. Purchases that by-pass the normal procurement procedures.
- 9. Frequent use of sole-source procurement contracts.
- 10. Vendors without physical address.
- 11. Vendor addresses matching employee addresses.
- 12. Purchasing agents that pick up vendor payments rather than have them mailed

Reference: ©2003 Association of Certified Fraud Examiners; Executive Roadmap to Fraud Prevention and

Internal Control, Martin T. Biegelman and Joel T. Bartow; Statement on Auditing Standards No. 99, Consideration of Fraud in a Financial Statement Audit, Exhibit; Red Flags for Fraud, Steven J. Hanc