

ULOGA I ZNAČAJ INTERNE KONTROLE I INTERNE REVIZIJE U SPREČAVANJU I IDENTIFIKOVANJU PREVARNIH RADNJI U BANKAMA

Prof. dr Snežana Knežević, FON Univerzitet u Beogradu, vanredni profesor
email: snezana.knezevic@fon.bg.ac.rs

Prof. dr Aleksandar Živković, Ekonomski fakultet, Univerzitet u Beogradu, redovan profesor

email: aleksandar.zivkovic@ekof.bg.ac.rs

Stefan Milojević, Preduzeće za reviziju, računovodstvene, finansijske i konsalting usluge Moodys Standards doo Beograd, asistent na Fakultetu za finansije, bankarstvo i reviziju u Beogradu
email: info@moodys.rs

Rezime

Savremene banke imaju ulogu i niz funkcija od primordijalnog značaja, kao finansijske institucije namenjene odobravanju zajmova, stvaranju kredita, mobilizaciji štednje i ekonomskog razvoja. U finansijskom sektoru raste broj lica koja koriste sve inovativnije i kreativnije načine ciljanja uočenih slabosti u bankama i sistemima odobravanja kredita. Lica koja čine prevare postala su sve sofisticiranija, što znači da mere za sprečavanje prevara moraju stalno da se razvijaju, kako bi se osigurala njihova sposobnost da se nose sa pretnjom. Borba protiv prevara je od presudnog značaja za institucije finansijskih usluga. Ovaj članak ima za cilj ne samo da ukratko opiše ulogu interne kontrole i interne revizije u otkrivanju mogućih prevara u bankama, kao profitno orijentisanim organizacijama u današnjem kompleksnom i veoma promenljivom poslovnom okruženju, već i da ukaže na prednosti koje one imaju u efikasnijem upravljanju aktivnostima banke.

Ključne reči: banka, prevarna radnja, interna kontrola, interna revizija, efikasnost.

JEL klasifikacija: M42, G21.

Uvod

Prevara je globalno prepoznata kao značajan problem i ona negativno utiče na ekonomiju u celini, time što dovodi do ogromnih finansijskih gubitaka i do gubitka poverenja u ekonomski sistem. Prema Ghazali et. al. (2014, 437), glavni uzroci prevara su loša praksa upravljanja i ekonomski pritisak. Mohameda & Handley-Schachelorb (2014, 323) ističu da je upravni odbor verovatno najefikasniji mehanizam interne kontrole za praćenje aktivnosti top menadžmenta. Isti autori (2014, 321), skreću pažnju da, s druge strane gledajući, integritet menadžmenta i razvoj internih sistema za sprečavanje prevarnog izveštavanja mogu pomoći u smanjenju verovatnoće prevara sa finansijskim izveštajima.

Nezavisno od toga što su tehnologije koje su preventivne posebno efikasne u redukciji prevarnih radnji, lica koja se bave prevarama često uspevaju da pronađu način kako bi zaobišli takve mere, te se u tom kontekstu ističe da su metodologije za otkrivanje prevara ključni činilac u efikasnom upravljanju rizikom od prevara u okolnostima kada prevencija prevare ne uspe (Bolton & Hand, 2002, 235). Oni ističu značaj koji imaju statistika i mašinsko učenje zbog toga što pružaju efikasne tehnologije za otkrivanje prevara i efikasni su u identifikovanju aktivnosti kao što su pranje novca, prevara sa kreditnom karticom u e-trgovini, prevara u telekomunikacijama i upad u računar.

Primetno je da je u akademskoj literaturi prisutan mali broj istraživanja kada su u pitanju prevare u bankama iz perspektive forenzičkih računovođa. S jedne strane, softverska zaštita podataka smatra se efikasnijom u sprečavanju i detektovanju prevara, što se moglo zaključiti i po interesovanju i izlaganjima eksperata iz prakse na onlajn savetovanju BankInfo2020 pod nazivom „Transformacija u službi klijenta“ koju je organizovalo Udruženje banaka Srbije. S druge strane, poznato je da postoji tzv. „neprozirnost“ bankarskih aktivnosti, koja zapravo odražava „neprozirnost“ industrije kojoj pripada. „Bankarska industrija je relativno manje transparentna industrija, ali bez obzira na to što se ovo objašnjenje čini validnim, ovaj argument se kritikuje i izaziva ozbiljnu zabrinutost zbog doprinosa forenzičkog računovodstva (i prevara) istraživanju bankarske prakse, te je plodno polazište identifikovati i razgovarati o nekoliko faktora koji doprinose teškoćama prakse forenzičkog računovodstva među bankama i finansijskim institucijama“ (Ozli, 2020, 98-99).

Interna kontrola je proces koji sprovode upravni odbor, menadžment i drugo osoblje entiteta, osmišljen da pruži razumno uverenje u pogledu postizanja ciljeva koji se odnose na aktivnosti, izveštavanje i usaglašavanje (PwC/COSO, 2012, 1). Definicija COSO-a i model koji pokriva sve komponente sistema interne kontrole, smernica je za ostale propise širom sveta. Interna kontrola je važan deo upravljanja svakom profitno orijentisanom organizacijom, te tako i bankom, i kao takva, ona uključuje planove, metode i postupke koji se koriste za postizanje postavljenih ciljeva, čime se podržava upravljanje zasnovano na učinku. Ono što je posebno važno istaći jeste da je interna kontrola zapravo „sigurnosni ventil“ za zaštitu imovine i sprečavanje grešaka i falsifikovanja, i u tom kontekstu se ističe da se aktivnosti tima zaposlenih realizuju kroz sledeće principe (Al-Wardat, 2006, 143):

- a) Budući postupci zavise od finansijskih izveštaja.
- b) Postoji posvećenost primeni zakona i odredbi.
- c) Postoji efektivnost i efikasnost poslovnih postupaka.

Veoma koncizan pogled na internu kontrolu daje Alharbi (2017, 232), koji ističe da se interna kontrola smatra upravljačkim alatom za očuvanje imovine organizacija i da njen kontinuitet doprinosi postiza-

nju opštih ciljeva (najbolje moguće profitabilnosti i zaštite prava akcionara), tako što će biti primenjen sistem baziran na postupcima efikasne kontrole primenjene na administrativnim i finansijskim funkcijama radi verifikacije legitimiteta i zakonitosti. Prema Hevesi (2005, 33), dok je ukupna svrha interne kontrole da pomogne organizaciji da ostvari svoju misiju, ona takođe pomaže organizaciji da:

- a) Promoviše uredno, ekonomično, efektivno i efikasno poslovanje i kvalitetne proizvode i usluge u skladu s misijom organizacije.
- b) Zaštiti resurse od gubitka zbog rasipanja, zloupotrebe, lošeg upravljanja, grešaka i prevara.
- c) Promoviše poštovanje zakona, propisa, ugovora i direktiva o upravljanju, razvija i održava pouzdane finansijske i upravljačke podatke i tačno ih prikazuje u pravovremenim izveštajima.

AlSharif & Al-Slehat (2019, 91) u radu navode da internu kontrolu u bankama treba posmatrati kroz dinamiku promena u okruženju. Naime, oni naglašavaju da je bankarski sektor zabeležio veliki razvoj poslednjih decenija, posebno u obimu, kvalitetu i brzini pruženih usluga, što je dovelo do intenziviranja konkurencije, te su stoga banke morale uspostaviti zdravu internu kontrolu u skladu sa politikama i u skladu sa nekoliko međunarodnih standarda u oblasti sistema interne kontrole.

Istraživanje u ovom radu usredsredili smo na sistematizaciju literature napisane u ovoj oblasti, kao i na pravilima koja regulišu aktivnosti interne kontrole i interne revizije od posebnog značaja. Radi sprovođenja našeg istraživanja, primenjena je metoda analize sadržaja, kao i komparativni metod, kako bi se identifikovala analogija između interne kontrole i interne revizije (ponaosob) i prevarnih radnji u bankama. Cilj istraživanja je pružanje šireg pogleda na efikasno upravljanje rizikom od nastanka prevarnih radnji u bankama. Prvi deo rada posvećen je specifičnostima prevarnih radnji u bankama, sa fokusom na uzorke i vrste. Uloga i značaj interne kontrole kao instrumenta sprečavanja prevarnih radnji u bankama predmet su izlaganja u drugom delu rada. Treći deo rada se odnosi na odgovornosti interne revizije u sprečavanju prevara. Nakon toga slede zaključna razmatranja.

Specifičnosti prevarnih radnji u bankama: uzroci i vrste

Uzroci prevara su propusti ili nedostaci koji se manifestuju na različite načine. Nedostatak adekvatnog nadzora prevarantski nastrojani zaposleni vidi kao priliku za korist. S jedne strane, razvoj novih tehnologija olakšao je tempo prevarantskih aktivnosti (izraženijih u računarskoj i informacionoj tehnologiji), a s druge, srebro ljublje, nezasićen apetit za masovnim bogatstvom i društveno-ekonomsko stanje društva utiču na pojedince da se bave prevarama (Ojo, 2008, 103). Isti autor ističe da se uzroci prevara i falsifikovanja u bankarskim transakcijama mogu klasifikovati pod dva generička faktora: institucionalni ili endogeni faktori i sredinski ili egzogeni (socijalni) faktori. Institucionalni faktori, ili uzroci, jesu oni koji se mogu pratiti u internom okruženju banaka. Iako je lista institucionalnih faktora neiscrpna, po svom značaju se ističu sledeći: (1) slab sistem računovodstva i interne kontrole, (2) neadekvatan nadzor nad podređenima, (3) loše upravljanje informacionom tehnologijom i bazom podataka, (4) loše kadrovske politike, (5) loše plate i uslovi vezani za usluge, (6) opšte frustracije izazvane neispunjenim obećanjima uprave, (7) odbijanje zaposlenih da se pridržavaju propisanih procedura bez ikakvih kazni ili sankcija, (8) nevoljnost banaka da prijave prevare zbog opaženog negativnog publiciteta ili imidža (ovo može stvoriti još više uslova pogodnih za nastanak prevara), (9) bankarsko iskustvo osoblja: prevara u bankama se dešava sa većom stopom ponavljanja među osobljem sa malo iskustva i

znanja u finansijskoj praksi, (10) neadekvatna infrastruktura: loši komunikacijski sistemi rezultiraju nagomilavanjem neuravnoteženih knjiženja, prenatrpanog kancelarijskog prostora itd, podstiču činjenje prevara u bankama, (11) neadekvatna obuka i prekvalifikacija, (12) loše vođenje knjiga i (13) genetske osobine: to su transgeneracijski (ili nasleđeni) atributi koje poseduje pojedinac, a koji ga dovode u stanje da učestvuje u prevarama. Na primer, kleptomani koji patološki krade iz zabave, prirodno ne bi bio dobar kao profesionalni bankar.

Prema Idowu (2009, 632), kao faktori okruženja identifikuju se oni za koje je moguće vršiti monitoring do neposrednog i udaljenog okruženja banke. Posebno indikativnu listu aktivnosti, koje su vezane za faktore ili uzroke nastanka prevarnih radnji u bankama, daje Ogbunka (2002, 188), a to su: sklonost ka brzom bogaćenju, spor i krivudav pravni postupak, siromaštvo i sve veći jaz između bogatih i siromašnih, nesigurnost posla, pritisak grupe sličnih pojedinaca, društvena očekivanja, povećan finansijski teret za pojedince, jaka konkurencija u bankarskoj industriji zbog koje su se mnoge banke upuštale u prevare kako bi se zadovoljile u pogledu likvidnosti i profitabilnosti.

Ogunleye (2010, 111) polazi od klasifikacije tri vrste uzroka nastanka bankarskih prevara, i detaljno ih opisuje kao: institucionalni, društveni i individualni uzroci. Za institucionalne faktore ističe se da su uslovi koje nesvesno stvaraju institucije i koji omogućavaju procvat prevare, te je u takvim institucijama dozvoljeno da postoji puno rupa koje prevaranti lako identifikuju i iskoriste za vršenje svojih dela. U tom kontekstu, Olatunji & Adekola (2014, 92) i Olaoye, Dada and Adebayo (2014), napominju sledeće objedinjene (opšte) institucionalne uzroke prevara: neadekvatna interna kontrola, neiskustvo osoblja/neadekvatna obuka osoblja, nezadovoljstvo zaposlenjem, loše upravljanje, nespремnost banaka da prijave prevaru zbog uočenog negativnog publiciteta, neadekvatna obuka i prekvalifikacija, neuspeh u redovnom pozivu, odbijanje zaposlenih da se pridržavaju propisanih procedura bez ikakvih kazni ili sankcija, automatizacija i informatizacija, te zanemarivanje poznavanja pravila kupaca. Društveni faktori, kao druga grupa faktora, inkorporiraju negativne društvene vrednosti, promociju nepotizma, lošu ekonomiju i spor pravni proces, te svi oni mogu podsticati činjenje prevarnih radnji (Akindele, 2011; Adewumi, 1996). Najzad, treća grupa uzroka bi obuhvatila faktore koji su svojstveni pojedinim osobama, koji mogu da je podstaknu na činjenje prevara, kao što su, primera radi, biološka osnova (npr. loše moralno vaspitanje, kriminalno poreklo, nezasićen apetit za avanturama), pogrešan izbor prijatelja ili mentora itd.

„Prevare postoje u različitim vrstama i u različitom stepenu: od zanemarljivih do ogromnih i katastrofalnih; od onih koje su počinili članovi organizacija (čak i oni od kojih se očekuje da to otkriju i spreče), do onih koje su počinili pojedinci izvan organizacije; od skoro svakodnevnih i lako otkrivenih prevara do sofisticiranih prevara gotovo nemogućih za otkrivanje. Ali, nezavisno od prirode prevare, od banaka se očekuje da prevarom upravljaju tako da spreče njenu pojavu i upravljaju njenim ishodom tamo gde se već dogodila“ (Nzenwata, 2). Još jednu vrstu podele prevara u bankama ističe Atherton (2010): (1) falsifikovane informacije ili dokument koji pokazuje neistine ili lažne informacije, (2) manipulacija kolateralom (kompanije za procenu koje procenjuju kolateral obično se uključuju u ovu vrstu prevare), (3) krađa finansijske imovine, odnosno krađa novčanih sredstava koja pripadaju banci, poput gotovine, depozita, obveznica itd., (4) krađa nefinansijske imovine, tj. krađa nemonetarne imovine banke (osnovnih sredstava, npr. automobila itd.), (5) elektronska prevara, tj. neovlašćeni pristup, manipulacija ili poremećaj sistema, infrastrukture ili podataka, (6) prevara putem plastike (prevara karticom) uključuje: sve izgubljene i ukradene, falsifikovane, neprimljene poruke, prevare sa aplikacijama trećih lica, nevažeće kartice itd.

Prevare u bankarstvu se veoma razlikuju po prirodi, karakteru i načinu sprovođenja, a Olaoye, Dada & Adebayo (2014) počinioce svrstavaju u tri grupe: članovi upravljačkih odbora banaka (upravljačka prevara), insajderi (zaposleni banke), autsajderi (klijenti i ne-klijenti). „Upravljačku prevaru čine osobe na poverljivim položajima koje imaju ovlašćenje da nadjačaju interne kontrole“ (Ahmed et. al., 2014, 157). Isti autori naglašavaju i to da su kategorije žrtava upravljačkih prevara investitori i poverioci, a medijum za izvršenje prevare su finansijski izveštaji. Ukoliko je reč o prevarama koje vrše zaposleni u banci, one su poznate pod nazivom ne-upravljačke prevare i vrše se na štetu organizacije, i to uglavnom uz direktnu ili indirektnu korist zaposlenog (Olaoye, 2009). Boniface (1991) je izvršio identifikaciju prevarnih radnji koje su karakteristične za zaposlene u bankama, i u tom kontekstu je kao ključne prevare naveo sledeće: krađa novca sa šaltera od strane osoblja banke, falsifikovanje potpisa klijenata sa namerom da se nezakonito podigne novac sa računa u banci, upotreba falsifikovanih čekova za podizanje novca sa računa klijenata, otvaranje i upravljanje fiktivnim računom na koji se mogu vršiti nelegalni transferi i pripisati lažni saldo, pozajmljivanje fiktivnim zajmoprimcima izvršeno putem fiktivnog računa otvorenog u filijali, polaganje prava na prekovremeni rad satima, suzbijanje gotovine/čekova; preusmeravanje sredstava i IT prevare. Definisana je još jedna vrsta prevare poznata pod nazivom „prevara autsajdera“, a koja se odnosi na prevare koje vrše klijenti i ne-klijenti na štetu banaka.

Crosse & Hempel (1973) i Cahil et. al. (2002) načelno su identifikovali pet glavnih vrsta prevara koje nastaju u bankarskoj industriji, a oni uključuju: (1) pozajmljivanje od blagajne (uz vraćanje u nekoliko navrata), (2) prekovremeni rad, (3) falsifikovanje potpisa kupaca za povlačenje sa njegovog/njenog naloga, (4) prenos sa računa klijenata na račune saradnika, (5) davanje zajmova fiktivnim zajmoprimcima, (6) davanje kredita bez adekvatnih informacija i osiguranja od zajmoprimca. Ako se prevara gleda prema počiniocima, onda je reč o eksternoj prevari koju je izvršio kupac ili neko treće lice, ili internoj koju je počinilo osoblje ili uprava (a to je i saradnja internih i eksternih strana). Posmatrajući cilj i nameru, prevara se može posmatrati kao kreditna prevara (cilj je pribavljanje finansija; namera nije plaćanje) ili kao krađa (cilj je krađa; namera nikada nije plaćanje). Ako se kao kriterijum posmatra broj slučajeva prevare počinioca ili grupe počinilaca, onda se prevara posmatra kao pojedinačna (jedan počinilac prevare; nema veze sa ostalim prevarama) ili višestruka (organizovani napad; nekoliko prevara povezanih sa jednim počiniocem).

Posmatrajući iz vizure menadžera i profesionalaca u borbi protiv prevara, ističe se da je ključ za smanjenje rizika i gubitaka od prevare razvijanje i primena odgovarajućeg plana upravljanja rizikom. Prema ISA 240 (171) „menadžment prihvata odgovornost za internu kontrolu entiteta i za pripremu finansijskih izveštaja entiteta, tako da se čini prikladnim da revizor postavi upite menadžmentu u vezi sa procenom rizika od prevare i postojeće kontrole kako bi se to sprečilo i otkrilo“. Ukoliko se pođe od pretpostavke da će postojeće interne kontrole otkriti i odvratiti prevaru, to može da dovede do povećanih gubitaka, što potvrđuje gubitak *Société Générale* od 4,9 milijardi evra u trgovinskoj prevari (Peltier-Rivest & Lanoue, 2015, 295). Bergant (2020, 116) ističe da je „komplajans funkcija jedna od ključnih funkcija za interno upravljanje, pošto predstavlja deo sistema interne kontrole i drugu liniju odbrane od rizika, a potrebno je imati u vidu i mnoge druge oblasti komplajans rizika (kao što su sprečavanje pranja novca, prevare itd.)“.

Interna kontrola kao instrument sprečavanja prevarnih radnji u bankama

Bologna (1993) daje pregled opštih faktora okruženja koji u značajnoj meri mogu da dovedu do povećanja verovatnoće da će se prevara dogoditi, a taj set faktora je sledeći: neadekvatne nagrade, neadekvatne interne kontrole, nedostatak razdvajanja dužnosti ili tragova revizije, nejasnoće u ulogama na poslu, dužnostima, odgovornostima i oblastima odgovornosti, neuspeh u savetovanju i preduzimanju administrativnih mera kada nivo učinka ili lično ponašanje padnu ispod prihvatljivog nivoa, neadekvatan operativni pregled, nedostatak pravovremenih ili periodičnih pregleda, inspekcija i praćenja kako bi se osigurala usklađenost sa ciljevima kompanije, prioritetima, politikama, procedurama i vladinim propisima i propust da se nadgledaju i sprovode politike o poštenju i lojalnosti.

Posebno važno pitanje koje treba razmotriti je pitanje nastanka prevara u filijalama banaka. Ukoliko su interne kontrole u filijalama neefikasne, to svakako dovodi do rasta verovatnoće da prevara može nastati. Te neefikasne ili, drugim rečima, loše interne kontrole u filijalama banaka uobičajeno karakteriše izuzetno loše kontrolno okruženje, nedostatak podele dužnosti – nejasna podela dužnosti, nedostatak fizičkih zaštitnih mera, nedostatak nezavisnih provera, nedostatak odgovarajućih ovlašćenja, nedostatak odgovarajućih dokumenata i evidencija, i neadekvatni računovodstveni sistemi.

Za poslovne banke posmatrano u celini, tako i po profitnim centrima, važno je da postoji usklađenost internih kontrola sa korporativnim politikama i procedurama, kako bi se efikasno upravljalo rizikom od nastanka prevara, kao i da se svi zaposleni u banci pridržavaju svih procedura i politika koje se odnose na njihove dužnosti, bilo administrativnih, finansijskih ili operativnih. Da bi se sprečile prevarne radnje, a i moguće greške iz nehata, posebno važno pitanje je obavljanje redovne obuke koja se odnosi na etiku, sa fokusom na prevenciju prevara, a koja bi obuhvatila sve zaposlene i menadžere banke. Ovo bi doprinelo sprečavanju jednog broja prevarnih radnji u bankama, čime bi došlo i do smanjenja gubitaka za banku, kao i smanjenja rizika od pojave reputacionog rizika banke. Interna saznanja menadžera su izvor evaluacije i distorzije računovodstvenih podataka, dok je eksternim korisnicima finansijskih izveštaja teško da razlikuju prave od lažnih informacija (Knežević et. al., 2009, 31), a za njih je od primordijalnog značaja da imaju uvid u ekonomsku realnost posmatranog bankarskog subjekta. Da bi se donele kvalitetne finansijske odluke, neophodno je da se ima dobar uvid u finansijske performanse, a jedna od tehnika koja se često koristi je finansijska analiza pomoću racio brojeva (Knežević & Živković, 2019, 411), a koja je istovremeno i koristan alat u identifikovanju mogućih prevarnih radnji u finansijskim izveštajima. Obuka zaposlenih u bankama u okviru odeljenja interne kontrole i interne revizije bi, pored ostalog, trebalo i da se kreće u pravcu mogućnosti primene određenih alata za pravovremeno identifikovanje prevarnih radnji koje bi dovele do gubitaka za banku, te do narušavanja njene poslovne reputacije. Na osnovu uvida u obavljanje praktičnih obuka iz oblasti prevencije i detekcije prevarnih radnji za profitno orijentisane organizacije, trenutno se u tome ističe Fakultet organizacionih nauka u Beogradu, koji je inače šire prepoznat po svojoj interdisciplinarnosti, a koja je i te kako poželjna u upravljanju rizikom od prevarnih radnji u svim profitno orijentisanim organizacijama, pa i u bankama. Obuke realizuju eminentni profesori ovog i drugih fakulteta, uz saradnju eksperata iz prakse (posebno iz Ministarstva unutrašnjih poslova, tužioca, kao i eksperata iz Republičkog zavoda za sudsko veštačenje u Novom Sadu). Ističe se da je potrebna veća pažnja u obrazovanju studenata preduzeća o prevarnom finansijskom izveštavanju, posebno onih koji će biti usmereni na finansije i računovodstvo. Warrick & Riner (2004, 1) nude predložene sugestije za pomoć studentima biznisa da identifikuju prevarno izveštavanje, uključivanjem nalaza drugih. Ovi autori naglašavaju da ako

studenti saznaju više o lažnom izveštavanju tokom njihove fakultetske karijere, postupak finansijskog izveštavanja ponovo će steći poverenje javnosti i izbeći buduće vladine regulative. Posebno je važno implementirati studije slučaja u nastavne materijale čiji bi primarni cilj bio da se pomogne studentima iz oblasti korporativnih finansija i računovodstva da razumeju anatomiju i motivacije za manipulaciju zaradom (podvukao: Milojević, S.).

Istraživanje koje su sproveli AlSharif & Al-Slehat (2019) dovelo je do zaključka da je došlo do statistički značajnog pozitivnog efekta interne kontrole na konkurentsku prednost banke, što znači da je procenat promene konkurentске prednosti banke objašnjen promenom dimenzija interne kontrole (administrativne, finansijske i operativne). U radu koji se odnosi na procenu efikasnosti na proces prevencije prevarnih radnji u bankarskom sistemu, Yakubu et. al., (2017) su uočili da je sistem interne kontrole u ispitivanim bankama bio efikasan u procesu kontrole nastanka prevarnih radnji. U drugim akademskim radovima, koji se odnose na internu kontrolu u bankama, autori su se detaljno bavili svim komponentama interne kontrole, analizirano je kontrolno okruženje prema stepenu kvaliteta, adekvatnost strategija dizajniranih za upravljanje rizicima od nastanka prevarnih radnji, kao i kvalitet informacionih i komunikacionih sistema poslovnih banaka.

Odgovornosti interne revizije u sprečavanju prevara

Institut internih revizora (*The Institute of Internal Auditors*) definiše internu reviziju kao „nezavisnu, objektivnu aktivnost obezbeđenja i konsultantske usluge dizajnirane da doda vrednost i poboljša poslovanje organizacije, i ona pomaže organizaciji da postigne svoje ciljeve donošenjem sistematskog, disciplinovanog pristupa za procenu i poboljšanje efikasnosti procesa upravljanja rizikom, kontrole i upravljanja“. Ako se posmatraju uloga i položaj interne revizije u bankama kao finansijskim institucijama od posebne važnosti za funkcionisanje ekonomskog sistema, ističe se da su one veoma kompleksne ukoliko se sagledavaju iz vizure raznih interesnih grupa.

Potrebno je imati u vidu da su odgovornosti u vezi sa sprečavanjem prevara unutar profitno orijentisane organizacije podeljene između izvršnog odbora, odbora za reviziju i interne revizije. U tom smislu, prvo se ističe važna uloga koju ima izvršni odbor, a to je konačna odgovornost za rano sprovođenje mehanizama otkrivanja i sprečavanja prevara. Poznato je da je (a i u skladu je sa ISA 240) izvršni odbor taj koji je odgovoran za sprečavanje i otkrivanje prevara i grešaka primenom i održavanjem odgovarajućih sistema računovodstva i interne kontrole, a koji takođe mogu doprineti smanjenju mogućnosti pojave prevara i grešaka, ali ne i njihovom potpunom eliminisanju. Druga važna uloga pripada komisiji za reviziju u smislu nadzora nad upravljanjem rizicima od nastanka prevara, s jedne strane, kao i aktivnom nadgledanju napora izvršnog odbora protiv vršenja prevara. Kako ističe Stefanović (2013, 58), „komisija za reviziju je pomoćno telo nadzornog odbora i ima važnu ulogu u definisanju odgovornosti u postupku finansijskog izveštavanja, interne kontrole i upravljanja rizicima“. Najzad, još jedna značajna uloga pripada internoj reviziji koja se smatra efikasnom linijom odbrane od prevara koja ima ulogu kako u nadgledanju rizika, tako i u sprečavanju i otkrivanju prevara. Važno je istaći da interna revizija predstavlja sredstvo kojim raspolaže odbor za reviziju, od koga se očekuje da samostalno proceni rizike od nastanka prevara i preduzme adekvatne mere protiv prevara koje sprovodi izvršni odbor. Prema Članu 79, Zakona o bankama (*Sl. glasnik RS*, br. 107/2005, 91/2010 i 14/2015) „banka je dužna da obrazuje odbor za praćenje poslovanja banke (odbor za reviziju), a prema Članu 80, istog zakona, „kad oceni da banka posluje suprotno zakonu, drugom propisu, statutu ili drugom aktu banke, ili se

to može zaključiti na osnovu izveštaja o reviziji, odnosno kad utvrdi druge nepravilnosti u poslovanju banke, odbor za praćenje poslovanja banke obavezno predlaže upravnom odboru banke da otkloni uočene nepravilnosti, kao i da zakaže vanredno zasedanje skupštine banke u slučaju da ustanovljene nepravilnosti mogu imati teže posledice na poslovanje banke". Primera rada, tri linije odbrane od rizika u banci u praktičnom ambijentu su: sistem interne kontrole kao prva linija odbrane (kontrola zaposlenih [*back-up* prodaje] u smislu da li je ispoštovana procedura u radu sa klijentima u prodaji) – pridržavanje politike rukovodstva, održavanje integriteta sredstava i dr; druga linija odbrane je služba/ odeljenje komplajansa uključujući i službu/odeljenje za sprečavanje pranja novca i finansiranja terorizma (na odabranom uzorku se prati izloženost riziku u domenu rada sa zaposlenima i vrši kontrola mogućih prevarnih transakcija i u vezi sa pranjem novca) i, najzad, treća linije odbrane – interna revizija koja za svoj rad odgovara upravnom odboru (preporuke u vezi sa rizikom) i ona ocenjuje efikasnost sistema internih kontrola. Postupci sistema internih kontrola treba da se organizuju na način koji će obezbediti praćenje i merenje rizika koji mogu negativno uticati na ostvarivanje utvrđenih poslovnih ciljeva banke (kreditni rizik, rizik zemlje dužnika, devizni rizik, rizik tržišta, kamatni rizik, rizik likvidnosti, operativni i dr), (Ljubisavljević, 2013, 50).

U razmatranju istraživane problematike, potrebno je istaći i razliku koja postoji između internih revizora u bankama i eksperata za istragu prevara (prevarnih radnji) koji mogu da budu deo zaposlenih u banci ili povremeno eksterno angažovani (prema potrebi), kako sa stanovišta njihovih uloga i odgovornosti, tako i u slučaju njihove profesionalne obuke i specijalnosti. Uloga internog revizora u bankama zavisi, naravno, i od njegove profesionalne obuke i praktičnih sposobnosti. Potrebno je, pored ostalog, da interni revizor u dovoljnoj meri poznaje „finansijski krvotok banke“. U praksi, uloga interne revizije može uključivati različite skupove odgovornosti: pružanje podrške upravi u uspostavljanju mehanizama za borbu protiv prevara koji se mogu revidirati; olakšavanje procene rizika od prevare i reputacije na nivou organizacije i njenog poslovnog procesa; procena veza između rizika od prevara i internih kontrola; revizija prevara; pružanje podrške specijalistima u istrazi prevare; održavanje napora na otklanjanju nedostataka; i izveštavanje komisije za reviziju o problemima u vezi sa mehanizmima za borbu protiv prevara, procenom rizika od prevare i reputacije ili slučajevima sumnji u prevaru (Petraske, 2012). Pored navedenog, od internog revizora se očekuje da efikasno upravlja programom interne revizije banke, da u dovoljnoj meri poznaje primenu metodologije za objektivno merenje različitih oblika inherentnog rizika na kvantitativnoj i kvalitativnoj osnovi (i primenjuje je), kao i da pruža adekvatnu podršku radu eksterne revizije. Kako naglašava Knežević (2019, 379), „interna revizija je ključna u pružanju podrške za upravljanje rizikom“.

Na osnovu nalaza studije, koju su na uzorku banaka u Nigeriji 2017. godine sprovedli Olatunji & Adekola (2017, 3034), zaključeno je da uloge revizora u teoriji i praksi u kontroli prevara koje su integrisani skup aktivnosti za sprečavanje, otkrivanje, reagovanje na prevare i nadgledanje prevara u finansijskom svetu ne mogu biti prenaplašene čak i sa sveprisutnošću slučajeva prevara u savremenom dobu. Procena rizika, revizija sistema i verifikacija finansijskih izveštaja sprovode se kako bi se utvrdili efikasnost i uticaj revizora na kontrolu prevara, što otkriva da uloge revizora treba i dalje poboljšati kako bi se poboljšala kontrola prevara u bankarskoj industriji. Studija je preporučila revizorima da povećaju obim svojih aktivnosti na efikasnosti sistema interne kontrole banaka, procenu rizika i reviziju sistema, jer će to poboljšati otkrivanje prevara. Takođe, uprave banaka treba da obezbede striktno poštovanje svog sistema interne kontrole i efikasno funkcionisanje banke u celosti (Lukić et al., 2018).

Zaključak

Prevara je danas prepoznata kao značajna pretnja sa kojom se suočavaju preduzeća i pojedinci širom sveta, i mnoštvo je izveštaja o prevarama počinjenih u biznisu i prema pojedincima. Imajući u vidu činjenicu da lica koja čine prevare postaju sve sofisticiranija, neophodno je u kontinuitetu razvijati mehanizme za zaštitu od prevara, kako bi banke i ostale finansijske institucije mogle da se nose sa ovom vrstom pretnje. Interna revizija ne može u potpunosti sprečiti prevaru, ali može prilagoditi način rada i postupke tako da poveća šanse za prepoznavanje i pravilno tumačenje znakova prevare. Interni revizori moraju imati vrhunski nivo teorijskog znanja i praktičnog iskustva kako bi uspešno ostvarili svoju ulogu. Moraju da znaju moguće šeme prevara i scenarije koji su specifični za područje rada organizacije (na primer, osiguranje banke, maloprodaja, telekomunikacije itd.) i da budu u stanju da prepoznaju znakove moguće šeme prevara. Logično je zaključiti da što zaposleni u banci imaju više iskustva i znanja, manja je verovatnoća da će prevare proći neopaženo, a takvo osoblje proći neotkriveno. Za primenu svega navedenog, postoji velika potreba za ulaganjem u specijalizaciju internih revizora finansiranjem kurseva za određene oblasti u poslovnim bankama. Druge organizacije kontaktiraju eksterne eksperte (na osnovu ugovora o uslugama) kako bi izvršile zadatak revizije, misleći da na taj način dobijaju eksperte visokog nivoa po relativno umerenoj ceni. Ključni element snažnog sistema interne kontrole je shvatanje svakog zaposlenog o neophodnosti efikasnog ispunjavanja njegovih odgovornosti i prenošenju podataka menadžmentu o bilo kom problemu koji se mogao pojaviti tokom poslovanja, internim normama ili uočenih nezakonitih radnji.

Da bi se u kontinuitetu efikasno upravljalo prevarama u poslovnim bankama, bitno je da menadžment implementira snažan sistem interne kontrole, da se uspostavi odeljenje interne revizije sa opremljenim i kvalifikovanim osobljem, da se utvrde mehanizmi podsticajnih paketa radi sprečavanja zaposlenih da se uključe u prevarne aktivnosti, kao i da postoji adekvatan odnos između menadžmenta i personala banke na nižem nivou. Pored podrške eksperata iz prakse, neophodna je i snažna podrška akademske zajednice, a koji bi zajedničkim naporima radili na podizanju svesti, edukaciji i sticanju veština iz praktičnih obuka da se na prevarne radnje deluje preventivno u okviru sistema interne kontrole, ali i da se prevare, koje se već dogode, otkriju i spreči njihov dalji nastanak.

Kritičnu komponentu efikasnog upravljanja bankom čini efektivan i efikasan sistem internih kontrola, koji je od posebnog značaja u realizaciji ciljeva poslovne banke – profitabilnosti, solventnosti i likvidnosti. Sistem interne kontrole ima veliku ulogu u smanjenju rizika s kojima se suočava banka. Kada je ovaj sistem dobro uspostavljen u banci, onda on doprinosi povećanju kvaliteta pruženih usluga i održavanju imovine banke, a najzad i rastu profita. Pored toga, efikasan sistem interne kontrole i interne revizije doprinosi u širokoj meri održavanju pouzdanog finansijskog i menadžerskog izveštavanja. Takođe, takav sistem može da obezbedi da se banka pridržava zakona i propisa, politika, planova, internih pravila i procedura, kao i da smanji rizik od neočekivanih gubitaka ili smanjenja ugleda banke, te preventivno deluje na pojavu prevarnih radnji.

Nezavisno od toga što se rezultati istraživanja vezani za nebankarske institucije ne mogu generalizovati i za banke, ne sme se dozvoliti akademsko i stručno zanemarivanje banaka, samo zbog njihove jedinstvenosti u poslovnim transakcijama. Imajući u vidu značaj koji banke imaju u privrednom sistemu svake nacionalne ekonomije, treba da podstakne trend snažnog ohrabrivanja istraživanja koja se tiču forenzičkog računovodstva u segmentu prevarnih radnji za banke, jer bi to svakako moglo da predstavlja značajan doprinos bankarskoj literaturi i praksi.

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THE ROLE AND IMPORTANCE OF INTERNAL CONTROL AND INTERNAL AUDIT IN THE PREVENTION AND IDENTIFICATION OF FRAUDULENT ACTIONS IN BANKS

Snežana Knežević, PhD, Faculty of Organizational Sciences, University of Belgrade, professor, email: snezana.knezevic@fon.bg.ac.rs

Aleksandar Živković, Faculty of Economics, University of Belgrade, full professor, email: aleksandar.zivkovic@ekof.bg.ac.rs

Stefan Milojević, Audit, accounting and financial consulting company - Moodys Standards doo Belgrade, Assistant at the Faculty of Finances, Banking and Audit, Belgrade, email: info@moodys.rs

Summary

Modern banks have a specific role and a whole range of functions of paramount importance, as financial institutions for granting loans, creating loans, mobilizing savings and economic development. In the financial sector, there is a growing number of people who are using increasingly innovative and creative ways of targeting all perceived weaknesses in banks and credit approval systems. The persons committing fraud have become increasingly sophisticated, which means that measures to prevent fraud must be constantly developed to ensure that they are able to deal with the threat. The fight against fraud is crucial for financial services institutions. This article aims not only to briefly describe the role of internal control and internal audit in detecting possible fraud in banks, as profit-oriented organizations in today's complex and highly changing business environment, but also to point out the advantages they have in the more efficient management of bank activities.

Keywords: bank, fraudulent action, internal control, internal audit, efficiency

JEL Classification: M42, G21.

Introduction

Fraud is globally recognized as a significant problem, as it negatively affects the economy as a whole, leading to huge financial losses and a loss of confidence in the economic system. According to Ghazali et al. (2014, 437), the main causes of fraud are poor management practices and economic pressure. Mohameda & Handley-Schachelorb (2014, 323) point out that the board of directors is probably the most efficient internal control mechanism for monitoring the activities of top management. The same authors (2014, 321) point out that, on the other hand, the integrity of management and the development of internal systems to prevent fraudulent reporting can help reduce the likelihood of fraud with financial statements.

Regardless of the fact that preventive technologies are particularly effective in reducing fraud, fraudsters often find a way to circumvent such measures, and in this context, it is emphasized that fraud detection methodologies are a key factor in effective fraud risk management under circumstances when fraud prevention fails (Bolton & Hand, 2002, 235). They emphasize the importance of statistics and machine learning because they provide effective fraud detection technologies and are effective in identifying activities such as money laundering, e-commerce credit card fraud, telecommunications fraud, and computer intrusion.

It is noticeable that there is a small number of research in academic literature when it comes to fraud in banks from the perspective of forensic accountants. On the one hand, software data protection is considered more efficient in preventing and detecting fraud, which could be concluded from the interest and presentations of experts from practice at the online conference BankInfo2020 entitled "Transformation at the Service of the Client" organized by the Association of Serbian Banks (2020), and on the other hand, it is known that there is a so-called "opacity" of banking activities, which actually reflects the "opacity" of the industry to which it belongs. "The banking industry is a relatively less transparent industry, but although this explanation seems valid, this argument is criticized and raises serious concerns about the contribution of forensic accounting (and frauds) to banking practice research, and a fruitful starting point is to identify and discuss several factors that contribute to the difficulties of forensic accounting practice among banks and financial institutions" (Ozli, 2020, 98-99).

Internal control is a process conducted by the board of directors, management, and other personnel of the entity, designed to provide reasonable assurance as to the achievement of objectives related to activities, reporting and compliance (PwC/COSO, 2012, 1). The definition of COSO and the model covering all components of the internal control system is a guideline for other regulations around the world. Internal control is an important part of managing any profit-oriented organization, including the bank, and as such, it includes plans, methods and procedures used to achieve the set goals, thus supporting performance-based management. What is particularly important to point out is that internal control is actually a "safety valve" for protecting assets and preventing errors and falsifications, and in this context, it is emphasized that the activities of the personnel team are realized through the following principles (Al-Wardat, 2006,143):

- a) Future procedures depend on the financial statements.
- b) There is a commitment to the application of laws and regulations.

c) There are the effectiveness and efficiency of business procedures.

A very concise view of internal control is given by Alharbi (2017, 232), who points out that internal control is considered a management tool for preserving the assets of organizations and that its continuity contributes to achieving general goals (best possible profitability and protection of shareholders' rights) by implementing a system based on effective control procedures applied to administrative and financial functions to verify legitimacy and legality. According to Hevesi (2005, 33), while the overall purpose of internal control is to help an organization accomplish its mission, it also helps an organization to:

- a) promote orderly, economical, effective, and efficient business and quality products and services in accordance with the mission of the organization.
- b) protect resources from loss due to waste, abuse, mismanagement, errors, and fraud.
- c) promote compliance with laws, regulations, contracts, and management directives, develop and maintain reliable financial and management data, and accurately present them in timely reports.

AlSharif & Al-Slehat (2019, 91) in their paper state that internal control in banks should be observed through the dynamics of changes in the environment. Namely, they emphasize that the banking sector has seen great development in recent decades, especially in the size, quality and speed of services provided, which has led to intensified competition, and therefore banks had to establish sound internal control in accordance with policies and to comply with several international standards in the field of internal control systems.

The research in this paper was focused on the systematization of the literature written in this area, as well as on the rules governing the activities of internal control and internal audit of special importance. In order to conduct our research, a method of content analysis was applied, as well as a comparative method to identify the analogy between internal control and internal audit (individually) and fraudulent actions in banks. The aim of the research is to broaden the view on the effective management of the risk of fraud in banks. The first part of the paper is dedicated to the specifics of fraudulent activities in banks with a focus on samples and types. The role and importance of internal control as an instrument for preventing fraudulent actions in banks are the subject of the second part of the paper. The third part of the paper deals with the responsibilities of internal audit in fraud prevention. Then follow the concluding observations.

Specifics of Fraudulent Actions in Banks: Causes and Types

The causes of fraud are omissions or shortcomings that manifest in different ways. The fraud-oriented employee sees the lack of adequate supervision as an opportunity and uses it. On the one hand, the development of new technologies has facilitated the pace of fraudulent activities (more pronounced in computer and information technology), and on the other hand, avarice, insatiable appetite for mass wealth and socio-economic status of society influence individuals to engage in fraud (Ojo, 2008, 103). The same author points out that the causes of fraud and forgery in banking transactions can be classified under two generic factors: institutional or endogenous factors and environmental or exogenous

(social) factors. The institutional factors or causes are those that can be monitored in the internal environment of banks. Although the list of institutional factors is inexhaustible, the following stand out in terms of importance: (1) weak accounting and internal control system, (2) inadequate supervision of subordinates, (3) poor management of information technology and database, (4) poor personnel policy, (5) poor wages and service conditions, (6) general frustrations caused by unfulfilled promises of management, (7) refusal of employees to adhere to prescribed procedures without any penalties or sanctions, (8) reluctance of banks to report fraud due to perceived negative publicity or image (this can create even more conditions conducive to fraud), (9) the banking experience of personnel: fraud in banks occurs with a higher repetition rate among personnel with little experience and knowledge in financial practice, (10) inadequate infrastructure: poor communication systems result in the accumulation of unbalanced postings, overcrowded office space, etc., encourage committing bank fraud, (11) inadequate training and retraining, (12) poor bookkeeping, and (13) genetic traits: these are transgenerational (or inherited) attributes possessed by the individual, which bring them into a position to participate in fraud. For example, a kleptomaniac who pathologically steals for their own entertainment would not naturally be as good as a professional banker.

According to Idow (2009, 632), environmental factors are those for which it is actually possible to monitor the immediate and remote environment of the bank. Ogbunka (2002, 188) gives a particularly indicative list of activities related to the factors or causes of fraud in banks, which are - the tendency to get rich quickly, slow and crooked legal processes, poverty and the growing gap between the rich and the poor, job insecurity, pressure from a group of similar individuals, social expectations, the increased financial burden for individuals, strong competition in the banking industry that has led many banks to engage in fraud to meet their own needs in terms of liquidity and profitability.

Ogunleye (2010, 111) starts from the classification of three types of causes of banking fraud, and describes them in detail - institutional, social, and individual causes. For institutional factors, they point out the conditions unconsciously created by institutions and allow fraud to flourish, and in fact, such institutions are allowed to have a lot of gaps that fraudsters easily identify and use to perform their acts. In this context, Olatunji & Adekola (2014, 92) and Olaoye, Dada and Adebayo (2014), note the following unified (general) institutional causes of fraud: inadequate internal control, the inexperience of personnel/inadequate personnel training, dissatisfaction with employment, poor management, the unwillingness of banks to report fraud due to perceived negative publicity, inadequate training and retraining, failure in regular operations, refusal of employees to adhere to prescribed procedures without any penalties or sanctions, automation and informatization and neglect of knowledge of customer rules. The social factors, as the second group of factors, incorporate negative social values, promotion of nepotism, bad economy, and slow legal processes, and all of them can encourage fraudulent actions (Akindele, 2011, Adewumi, 1996). Finally, the third group of causes would include factors that are specific to individuals, and that may encourage them to commit fraud, such as, for example, biological basis (e.g., poor moral upbringing, criminal origin, insatiable appetite for adventure), wrong choosing a friend or mentor, etc.

"Frauds exist in different types and to different degrees: from negligible to huge and catastrophic; from those committed by members of organizations (even those expected to detect and prevent it), to those committed by individuals outside the organization; from almost every day and easily detected frauds to sophisticated and almost impossible to detect frauds, but regardless of the nature of the fraud, banks are expected to manage the fraud so as to prevent its occurrence and manage its outcome where it has already occurred" (Nzenwata, p. 2). Another type of fraud division in banks is high-

lighted by Atherton (2010): (1) falsified information or a document showing untrue or false information, (2) collateral manipulation (collateral valuation companies are usually involved in this type of fraud), (3) theft of financial assets, i.e. theft of funds belonging to the bank, such as cash, deposits, bonds, etc., (4) theft of non-financial assets, i.e. theft of non-monetary assets of a bank (fixed assets, e.g. cars, etc.), (5) electronic fraud, i.e. unauthorized access, manipulation or disruption of the system, infrastructure or data, (6), fraud through plastic (card fraud) includes: all lost and stolen, forged, unreceived messages, fraud with third-party applications, invalid cards, etc.

Banking frauds vary greatly in nature, character, and enforcement, and Olaoye, Dada, and Adebayo (2014) classify perpetrators into three groups: members of bank management boards (management fraud), insiders (bank employees), outsiders (clients and non-clients). "Management fraud is committed by persons in confidential positions who have the authority to override internal controls" (Ahmed et al., 2104, 157). The same authors emphasize that the categories of management fraud victims are investors and creditors, and the medium for committing fraud are financial reports. In the case of fraud committed by bank employees, they are known as non-management fraud, and they are committed to the detriment of the organization, mainly with the direct or indirect benefit of the employee (Olaoye, 2009). Boniface (1991) identified fraudulent activities that are characteristic of bank employees, and in this context, he listed the following as key frauds: theft of money from counters by bank personnel, forgery of clients' signatures with the intention of illegally withdrawing money from bank accounts, use of counterfeit checks to withdraw money from clients' accounts, opening and managing a fictitious account to which illegal transfers can be made and a false balance credited, lending to fictitious borrowers through a fictitious account opened in the branch, claiming the right to work overtime for hours, suppression of cash/checks; diversion of funds and IT fraud. Another type of fraud known as "outsider fraud" has been defined, which refers to fraud committed by clients and non-clients to the detriment of banks.

Crosse & Hempel (1973) and Cahil et al. (2002) identified in principle the five main types of fraud that occur in the banking industry, and they include: (1) "borrowing" from the cash register (with return on several occasions), (2) overtime work, (3) forgery of customer signatures for withdrawal from their account, (4) transfer from clients' accounts to associates' accounts, (5) giving loans to fictitious borrowers, (6) granting loans without adequate information and insurance from the borrower. If the fraud is viewed in terms of the perpetrators, then it can be an external one committed by the customer or a third party, or an internal one committed by the personnel or management (including also the cooperation of internal and external parties). Looking at the goal and intention, fraud can be classified as credit fraud (the goal is to obtain finance; there is no intention to make payments) or as theft (the goal is to steal; the intention is never to make payments). When considering the number of frauds a perpetrator commits, or the existence of a group of perpetrators, then fraud can be considered as either single (one perpetrator of fraud; has nothing to do with other frauds) or multiple (organized attack; several frauds related to one perpetrator).

From the point of view of managers and professionals in the fight against fraud, it is emphasized that the key to reducing the risk and losses from fraud is to develop and implement an appropriate risk management plan. According to ISA 240 (171), "management accepts responsibility for the entity's internal control and for the preparation of entity's financial statements, so it seems appropriate for the auditor to make inquiries to management regarding fraud risk assessment and existing controls to prevent and detect this". Assuming that existing internal controls will detect and deter fraud, this can lead to increased losses, confirming Société Générale's 4.9-billion-euro loss in trade fraud (Peltier-Rivest &

Lanoue, 2015, 295). Bergant (2020, 116) points out that “compliance function is one of the key functions for internal management, as it is part of the internal control system and the second line of risk protection, and many other areas of compliance risk need to be considered (such as prevention of money laundering, fraud, etc.).

Internal Control as an Instrument to Prevent Fraudulent Actions in Banks

Bologna (1993) provides an overview of general environmental factors that can significantly increase the likelihood that fraud will occur, and this set of factors is as follows: inadequate rewards, inadequate internal controls, lack of segregation of duties or traces of audit, ambiguities in job roles, duties, responsibilities and areas of responsibility, failure to advise and take administrative action when performance levels or personal conduct fall below acceptable levels, inadequate operational review, lack of timely or periodic reviews, inspections and monitoring to ensure compliance with company objectives, priorities, policies, procedures and government regulations and failure to monitor and enforce honesty and loyalty policies.

A particularly important issue to consider is the issue of fraud occurrence in bank branches. If the internal controls in the branches are ineffective, it certainly leads to an increase in the probability that fraud can occur. These inefficient or in other words, poor internal controls in bank branches are usually characterized by an extremely poorly controlled environment, lack of segregation of duties - unclear segregation of duties, lack of physical safeguards, lack of independent checks, lack of proper authority, lack of proper documents and records, and inadequate accounting systems.

For commercial banks as a whole, as well as in profit centers, it is important to have the the compliance of internal controls with corporate policies and procedures, in order to effectively manage the risk of fraud occurrence, and that all bank personnel adhere to all procedures and policies relating to their duties, whether administrative, financial or operational. In order to prevent fraudulent actions, as well as possible mistakes due to negligence, a particularly important issue is the conduct of regular training related to ethics, with a focus on fraud prevention, which would include all employees and managers of the bank. This would contribute to preventing the number of fraudulent actions in banks, which would reduce losses for the bank, as well as reduce possibility of reputational risk for the bank. Managers' internal knowledge is a source of evaluation and distortion of accounting data, while external users of financial statements find it difficult to distinguish true from false information (Knežević et al., 2009, 31), and for them, it is of paramount importance to have insight into the economic reality of the observed banking entity. In order to make quality financial decisions, it is necessary to have a good insight into financial performance, and one of the techniques that is often used is a financial analysis using ratio numbers (Knežević & Živković, 2019, 411), which is also a useful tool in identifying possible fraud in financial statements. The training of a bank's personnel within the internal control and internal audit department should, among other things, move towards the possibility of applying certain tools for timely identification of fraudulent actions that would lead to losses for the bank and damage its business reputation. Based on the insight into conducting practical training in the field of prevention and detection of fraud for profit-oriented organizations, the Faculty of Organizational Sciences in Belgrade currently stands out, as it is also otherwise widely recognized for its interdisciplinarity, something very desirable for managing the risk of fraudulent actions in all profit-oriented organizations, including banks. The training courses are led by eminent professors of this and other faculties with

the cooperation of experts from practice (especially from the Ministry of Internal Affairs, prosecutors, as well as experts from the Republic Institute for Forensic Expertise in Novi Sad). It is emphasized that greater attention is needed in educating students of companies on fraudulent financial reporting, especially those that will be focused on finance and accounting. Warrick & Riner (2004, 1), offer proposed suggestions to help business students identify fraudulent reporting and include the findings of others. These authors emphasize that, if students learn more about false reporting during their college career, the financial reporting process will regain the trust of the investing public and avoid future government regulations. It is especially important to implement case studies in teaching materials whose primary goal would be to help students in the field of corporate finance and accounting to understand the anatomy and motivations for manipulating earnings (underlined by Milojević, S.).

A survey conducted by AlSharif & Al-Slehat (2019) concluded that there was a statistically significant positive effect of internal control on the bank's competitive advantage, which means that the percentage change in the bank's competitive advantage was explained by changes in internal control dimensions (administrative, financial, and operational). In a paper related to the assessment of efficiency in the process of fraud prevention in the banking system, Yakubu et al. (2017) observed that the internal control system in the surveyed banks was effective in the process of controlling the occurrence of fraudulent actions. In other academic papers related to internal control in banks, the authors dealt in detail with all components of internal control, analyzed the control environment according to the degree of quality, adequacy of strategies designed to manage the risks of fraudulent actions occurrence and the quality of information and communication systems of commercial banks.

The Responsibilities of the Internal Audit in Fraud Prevention

The Institute of Internal Auditors defines an internal audit as "an independent, objective assurance activity and consulting service designed to add value and improve an organization's operations, and it helps an organization achieve its goals by adopting a systematic disciplined approach to assessing and improving process efficiency of risk management, control and management". If we look at the role and position of internal audit in banks as financial institutions of special importance for the functioning of the economic system, it is pointed out that they are very complex if viewed from the perspective of various interest groups.

It should be borne in mind that responsibilities related to fraud prevention within a profit-oriented organization are divided among the executive board, the audit committee, and the internal audit. In this regard, the important role played by the executive board is emphasized first, and that is the ultimate responsibility for the early implementation of fraud detection and prevention mechanisms. It is known that (and in accordance with ISA 240) the executive board is responsible for preventing and detecting fraud and error by implementing and maintaining appropriate accounting and internal control systems, which can also contribute to reducing the possibility of fraud and error, but not for their complete elimination. Another important role belongs to the audit committee in terms of overseeing the risk management of fraud occurrence, on the one hand, as well as actively monitoring the efforts of the executive board against committing fraud. As Stefanović (2013, 58) points out, "the audit committee is an auxiliary body of the supervisory board and has an important role in defining responsibilities in the

process of financial reporting, internal control and risks management." Finally, another important role belongs to an internal audit, which is considered an effective line of defense against fraud, which has a role both in monitoring risk and in preventing and detecting fraud. It is important to point out that an internal audit is a tool available to the audit committee, which is expected to independently assess the risks of fraud occurrence and take adequate measures against fraud carried out by the executive board. According to Article 79 of the Law on Banks ("Official Gazette of RS", No. 107/2005, 91/2010 and 14/2015), "a bank is obliged to form a committee for monitoring the bank's operations (audit committee), and according to Article 80 of the same law, "when it assesses that the bank operates contrary to the law, other regulation, statute or other act of the bank or it can be concluded on the basis of an audit report, or when it finds other irregularities in the bank's operations, the bank's monitoring committee must propose to eliminate the observed irregularities, as well as to schedule an extraordinary session of the bank's assembly in case the established irregularities may have more serious consequences on the bank's operations". For example, the three lines of risk protection in the bank in a practical environment are the internal control system as the first line of defense (control of employees [back-up of sales] in terms of whether the procedure is followed in working with customers in sales) - adherence to management policy, maintaining the integrity of assets, etc.; the second line of defense is the compliance service/department including the anti-money laundering and terrorist financing service/department (a sample is selected and monitored for risk in respect of working with employees, and it is controlled for possible fraudulent transactions related to money laundering) and finally, the third line of defense - an internal audit that is accountable to the management board for its work (risk recommendations) and it assesses the effectiveness of the internal control system. The procedures of the internal control system should be organized in a way that will ensure monitoring and measurement of risks that may adversely affect the achievement of the bank's established business objectives (credit risk, debtor country risk, foreign exchange risk, market risk, interest rate risk, liquidity risk, operational, etc.); (Ljubisavljević, 2013, 50).

In considering the researched issues, it seems necessary to point out the difference that exists between internal auditors in banks and experts for fraud (fraudulent actions) investigation who can be part of the bank's personnel or occasionally externally engaged (as needed), both from the point of view of their roles and responsibilities, as well as in terms of their professional training and specialty. The role of the internal auditor in banks depends, of course, on their professional training and practical skills. It is necessary, among other things, that the internal auditor has sufficient knowledge of the "financial blood flow of the bank". In practice, the role of internal audit may involve different sets of responsibilities: providing support to management in establishing auditable anti-fraud mechanisms; facilitating fraud and reputation risk assessment at the level of the organization and its business process; assessment of the links between fraud risk and internal controls; fraud audit; providing support to specialists in fraud investigation, supporting efforts to eliminate deficiencies; and reporting to the audit committee on problems related to anti-fraud mechanisms, fraud risk and reputation assessments, or suspected fraud cases (Petrascu, 2012). In addition, the internal auditor is expected to effectively manage the bank's internal audit program, to sufficiently know the application of the methodology for objective measurement of various forms of inherent risk on a quantitative and qualitative basis (and applies it), and to provide adequate support to external audit. As Knežević emphasizes (2019, 379), "internal audit is key in providing support for risk management."

Based on the findings of a study conducted on a sample of banks in Nigeria in 2017 by Olatunji, &

Adekola (2017, 3034) it was concluded that the roles of auditors in theory and practice in fraud control are an integrated set of activities to prevent, detect, respond to and monitor fraud in the financial world cannot be overemphasized even with the ubiquity of cases of fraud in the modern age. Risk assessment, system audits and verification of financial statements are conducted to determine the effectiveness and impact of auditors on fraud control, which reveals that auditors' roles need to be further improved to improve fraud control in the banking industry. The study recommended that auditors increase the scope of their activities on the efficiency of banks' internal control systems, risk assessment and system audits, as this will improve fraud detection. Also, bank managements need to ensure strict compliance with their internal control system and the efficient functioning of the bank as a whole (Lukić et al., 2018).

Conclusion

Fraud is recognized today as a significant threat faced by businesses and individuals around the world, and there are numerous reports of fraud committed in business and against individuals. Having this in mind, as well as the fact that fraud perpetrators have become increasingly sophisticated, it is necessary to continuously develop fraud protection mechanisms so that banks and other financial institutions can deal with this type of threat. Internal audit cannot completely prevent fraud, but it can adjust the manner of its work and procedures so as to increase the chances of recognizing and correctly interpreting the signs of fraud. Internal auditors must have a top level of theoretical knowledge and practical experience in order to successfully accomplish their role. They need to know possible fraud schemes and scenarios that are specific to the area of work of the organization (for example, insurance, banks, retail, telecommunications, etc.) and be able to recognize the signs of a possible fraud scheme. It is logical to conclude that the more experienced and knowledgeable the bank's personnel is, the less likely it is that fraud will go unnoticed and such personnel will go undetected. To implement all of the above, there is a great need to invest in the specialization of internal auditors by financing courses in certain areas in commercial banks. Other organizations contact external experts (based on service contracts) to perform the audit task, thinking that in this way they get high-level experts at a relatively reasonable price. The key element of a strong internal control system is each employee's understanding of the need to effectively fulfill their responsibilities and communicate data to management about any problem that may have arisen during business, internal standards, or detected illegal actions.

In order to continue effectively managing fraud in commercial banks, it is important that the management implements a strong internal control system, to establish an internal audit department with equipped and qualified personnel, to establish incentive mechanisms to prevent employees from engaging in fraudulent activities, as well as that there is an adequate relationship between the management and personnel of the bank at a lower level. In addition to the support of experts from practice, strong support from the academic community is needed, who would work together to raise awareness, educate, and acquire skills from practical training to act preventively to fraudulent actions within the internal control system, but also to discover ongoing frauds and prevent their further occurrence.

The critical component of efficient bank management is an effective and efficient system of internal controls, which is of special importance in the realization of the goals of a commercial bank - profitability, solvency, and liquidity. The internal control system plays a major role in reducing the risks faced by the bank. When this system is well established in the bank, then it contributes to increasing the quality of services provided and maintaining the bank's assets, and ultimately to the growth of profits.

In addition, an effective system of internal control and internal audit contributes extensively to the maintenance of reliable financial and managerial reporting. In addition, such a system can also ensure that the bank complies with laws and regulations, policies, plans, internal rules and procedures, reduces the risk of unexpected losses or damage to the bank's reputation, and acts preventively to the occurrence of fraudulent actions.

Regardless of the fact that the results of research related to non-banking institutions cannot be generalized for banks, we must not allow academic and professional neglect of banks, just because of their uniqueness in business transactions. Given the importance that banks have in the economic system of any national economy, the trend of strongly encouraging research should be encouraged related to forensic accounting in the segment of fraudulent actions for banks, because it could certainly be a significant contribution to the banking literature and practice.

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