



FINANCIAL WRONGDOING MANAGEMENT

INTRODUCTION

Marist Mission Centre (MMC) is the international development arm of the Marist Fathers for the Province of Australia. Our motto is 'sustaining hope'. Our primary focus is to promote sustainable change for the most vulnerable and disadvantaged especially women and children. A core value of MMC is promoting the dignity of the human person as affirmed by internationally recognised human rights conventions.

Not-for-profit organisations, like their commercial counterparts, may be subject to fraudulent activity, corruption and money laundering and must therefore implement effective prevention strategies to minimise legal and financial exposure.

Please note that the first version of this policy was titled 'Fraud Risk Management Policy'. Its current title reflects an expansion to address other forms of financial wrongdoing.

PURPOSE

The purpose of this policy is to:

- Provide all MMC stakeholders with information on what constitutes financial wrongdoing, with explicit reference to fraud, corruption and money laundering,
- Set out the responsibilities that are incumbent on staff members and project partners for the management and reporting of issues that may constitute financial wrongdoing,
- Express a clear statement to MMC stakeholders forbidding financial wrongdoing for individual or organisational benefit.

SCOPE

This policy applies to Trustees, MMC committee members, employees, volunteers, partners and other stakeholders who operate under the auspices of MMC.

DEFINITIONS

MMC accepts the definitions provided by the Australian Council for International Development (ACFID) and borrows from them in the development of this list of definitions.

Financial wrongdoing is illegal or immoral behaviour that divert resources from their intended goals. This is often related to financial resources, but could also include actions to gain non-monetary benefits such as status, control or power. There are various forms of financial wrongdoing, but this policy applies in particular to fraud, corruption (including bribery) and money-laundering.

Fraud is use of one's occupation for personal enrichment through deception or the deliberate misuse or misapplication of an organisation's resources or assets.

Corruption is the abuse of entrusted power for private gain.

Bribery is the offering, promising, giving, accepting or soliciting of an advantage as an inducement for an action which is illegal, unethical or a breach of trust. Inducements can take the form of gifts, loans, fees, rewards or other advantages.

Money Laundering is the process of concealing the origin, ownership or destination of illegally or dishonestly obtained money and hiding it within legitimate economic activities to make them appear legal.



FINANCIAL WRONGDOING MANAGEMENT

Whistleblower is a member of staff, volunteer, contractor, partner or director who reports suspected wrongdoing, including suspicion of fraud, misuse of resources, neglect of duties or a risk to health and safety.

Financial wrongdoing includes, but is not limited to the following:

- Any dishonest or fraudulent act;
- Misappropriation of funds, securities, supplies or other assets;
- Impropriety in the handling or reporting of money or financial transactions;
- Disclosing confidential and proprietary information to outside parties;
- Accepting or seeking anything of material value from contractors or persons providing services or materials to MMC;
- Destruction, removal or inappropriate use of records, furniture, fixtures or equipment;
- Any similar or related irregularity;
- Providing false or misleading information;
- False accounting;
- Wrongfully using information or intellectual property;
- Bribery, corruption or abuse of office.

POLICY

MMC promotes a culture of honesty, integrity and trust. It is committed to responsible stewardship of the resources that it holds on behalf of the communities it services. MMC commits itself to minimising the risk of financial wrongdoing and to promoting transparency within its operations according to the following guidelines.

1. MMC prohibits illegal activity, including fraud, corruption, bribery and money laundering by all who operate under the auspices of or in partnership with MMC.
2. MMC will ensure that all stakeholders are aware of their obligation to act in an honest manner; to assist in the control and mitigation of financial wrongdoing; and to report any suspicious behaviour to the appropriate authority.
3. MMC maintains effective prevention, control, detection and reporting measures to avoid and respond appropriately to financial wrongdoing hazards.
4. Any suspected financial wrongdoing activity or irregularity will be fully investigated objectively, as deemed necessary, regardless of the position, title, length of service or relationship with the organisation of any party who might be the subject of such investigation.
5. Report any serious case of financial wrongdoing to the police or other relevant authorities.



FINANCIAL WRONGDOING MANAGEMENT

MONITORING & REVIEW OF POLICY

MMC will undertake a review of this policy every three years or sooner if required. Reviews will initially be undertaken by the Executive Officer and MMC staff, with oversight by the MMC Advisory Committee and final approval by the Trustees of the Marist Fathers for the Province of Australia.

RELATED DOCUMENTS

MMC Transparency Policy

MMC Counter-Terrorism Policy

MMC Fundraising and Donations Policy

MMC Complaints Handling Policy

MMC Whistleblower Policy