



Policy Title: **Prevention of Financial Wrongdoing**

Definitions¹:

Fraud is an intentional distortion, deceit, trickery, and perversion of truth or breach of confidence, relating to an organization's financial, material, or human resources, assets, services and/or transactions, generally for the purpose of personal gain or benefit. **Fraud** is a criminal deception or the use of false representations to gain an unjust advantage.

Corruption is the "offering, giving, soliciting or acceptance of an inducement or reward which may improperly influence the action of any person".

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 and may take the form of gifts, loans, fees, rewards or other advantages

Financial Wrongdoing is behaviour that is illegal or immoral with regards to financial transactions and includes bribery, corruption, fraud, money-laundering, terrorism financing and violation of sanctions imposed by the Australian government.

Money Laundering – 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.

Terrorism Financing – intentionally providing or collecting funds and being reckless as to whether those funds would be used to facilitate or engage in a terrorist act.

Policy

- GMP Extend has a zero-tolerance approach to financial wrong-doing.
- GMP Extend staff shall never take advantage of their position when working with communities, partners or other stakeholders.
- GMP Extend will publicise this policy to all staff.
- GMP Extend will protect the safety and confidentiality of whistle-blowers (those who make complaints disclosing the unacceptable behaviour of staff or external contacts)
- GMP Extend staff, board and volunteers will be required to commit to honesty and openness and these anti-financial wrong doing requirements will be included in the board staff code of conduct.

¹ The definitions are taken from the Transparency International Anti-Corruption Glossary and the ACFID Code of Conduct.

- GMP Extend Partners will be required to maintain a policy that includes the content of the Partner Policy Template on the prevention of Financial Wrongdoing.
- GMP Extend will maintain processes that empower our partners (in Australia and overseas) to develop robust financial systems and will ensure that donations received by GMP Extend are for approved GMP Extend activities.

In the event of financial wrongdoing taking place

- Instances of fraud will be reported to any relevant funding body within 5 days or according to the agreement with the funding body, whichever is the least, and may include the involvement of the relevant police.
- Where GMP Extend staff are suspected of fraud or corruption the GMP Extend Board will be informed within 5 days and a review process according to the GMP Extend Complaints Policy will be implemented and may include the involvement of the relevant police.
- In the event of other forms of Financial Wrongdoing, relevant funding partners and the GMP Extend Board will be advised within 5 days of the matter coming to light. Steps to be taken in relation to such matters will be determined by either or both the funding body and/or the GMP Extend Board.
- Actions may include the appointment of an independent forensic auditor to examine the particular matter and make recommendations in regard to actions needing to be taken.