

Policy Name	Financial Misconduct and Crime Policy			Strategic Strand: Commitment 1: Principled decision-making
Policy Ref	DIR/POL/005	Owner	Director of Finance	
Review cycle	Every THREE years	Responsibility	AFRC	Version: 8, Q1 2025
Policy Statement	<b>Acts of financial misconduct and crime threaten funds and assets required for MAG's activities to keep communities safe from harm. MAG is committed to preventing financial misconduct and crime and investigating plausible allegations of such actions.</b>			
Scope and limitation	This Policy applies to all MAG personnel and associates (trustees, international, national and HQ employees and consultants, organisations working in partnership with MAG).			
Implementation	<p>MAG personnel and associates shall:</p> <ul style="list-style-type: none"> <li>protect MAG's and its donors' funds and assets, acting appropriately to ensure that they are not misappropriated, misdirected, lost, misused or damaged;</li> <li>ensure that all financial transactions are properly authorised, recorded and reported as required by MAG's financial framework and relevant laws, regulations and donor requirements;</li> <li>abide by all relevant international and local laws governing financial crime, bribery and corruption.</li> </ul>			
Reporting concerns	MAG personnel and associates shall report immediately any suspicion of financial misconduct, crime or non-compliance with this Policy, following the guidelines in MAG's Whistleblowing Policy and Procedure.			
Investigating concerns	<p>MAG's management shall</p> <ul style="list-style-type: none"> <li>investigate plausible allegations of financial misconduct and financial crime;</li> <li>reserve the right to search all MAG property and review all data stored on MAG systems and hardware if there are reasonable suspicions of financial misconduct or crime;</li> <li>where proportionate to the nature of the concern, inform and work collaboratively with local and / or international law enforcement bodies in relation to any related investigations and prosecutions;</li> <li>seek to recover any losses wherever viable.</li> </ul>			
Non-Compliance	Any failure to comply with this policy will be investigated and may lead to disciplinary action being taken in accordance with MAG's Disciplinary Policy and relevant Disciplinary Procedure, or to termination of contracts.			
Glossary of terms	<p><b>Financial misconduct:</b> Non-conformance with MAG's ethical standards and internal financial policies, controls and procedures, whereby such behaviour would risk the loss, misappropriation or misreporting of MAG's and donors' assets and funds.</p> <p><b>Financial crime:</b> Intentional illegal and dishonest actions to defraud MAG, misappropriate, misuse, redirect and / or wrongfully gain assets and funds, including acts of bribery and corruption.</p>			
Ethics, Values and Mission	Integrity: We strive to do the right thing.			
Delegations of Authority	The responsible member of the Leadership Team is the Director of Finance. The Director of Finance will be informed by the Head of Financial Compliance on matters relevant to this policy.			
Mandatory Reporting	All investigations of financial crime and misconduct will be reported to MAG's Audit and Finance Committee and if contract, regulation or law requires, to donors, the UK Charity Commission and relevant local authorities.			
Risk management	Risks are managed through the MAG Risk Framework.			
Legislation and codes of conduct	<ul style="list-style-type: none"> <li>All financial crime, anti -bribery and -corruption laws relevant to MAG's donor countries and countries of operation</li> <li>MAG Code of Conduct / Policy on Personal Conduct</li> <li>MAG Finance Framework and procedures</li> <li>MAG Procurement Policy</li> <li>MAG Whistleblowing Policy and Procedure</li> <li>MAG Investigations Handbook</li> <li>MAG Financial Misconduct and Crime Handbook</li> </ul>			

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