

Financial Wrongdoing Policy

Functional Area: Management

Date approved: 24 March 2026

Board Resolution: UWB20260324-5

1 Context

UnitingWorld operates in a complex and changing international environment and relies on the trust of communities, donors, governments and partners to deliver international programs in accordance with our mandate and charitable purpose.

UnitingWorld is a registered charity with the Australian Charities and Not-for-profits Commission (ACNC) and undertakes fundraising activities in accordance with applicable Australian charity and fundraising regulation. UnitingWorld also receives institutional funding, including from the Australian Department of Foreign Affairs and Trade (DFAT), and is contractually required to meet relevant donor fraud, corruption and financial control requirements and standards.

As an agency of the Uniting Church in Australia, UnitingWorld aligns its approach to the prevention and management of financial wrongdoing with relevant National Assembly policies and requirements, while maintaining its own policies and procedures appropriate to its operations and donor obligations.

This policy outlines UnitingWorld's approach to preventing, detecting and responding to all forms of financial wrongdoing, including fraud, corruption, bribery, money laundering and terrorism financing, and to meeting its obligations under Australian law, including the oversight functions of the National Anti-Corruption Commission (NACC), where applicable, as well as relevant laws in the countries where our partners operate.

UnitingWorld aligns its approach to the prevention and management of financial wrongdoing with relevant sector and alliance standards, including the Australian Council for International Development (ACFID) Code of Conduct and the ACT Alliance Anti-Fraud and Corruption Policy.

Risks of financial wrongdoing vary across countries, sectors, partners and projects. The level of risk is influenced by the strength of governance processes and the prevalence of corruption in the broader operating context and within local systems. We work with communities and people who experience significant financial stress due to poverty. We recognise the risks associated with international funds transfers, including money laundering and terrorism funding.

Therefore, UnitingWorld's risk management approach to financial wrongdoing is contextualised, with management actions being based on and proportionate to the assessed contextual risk, while still meeting applicable donor, regulatory and legal requirements.

2 Scope

This policy applies to all UnitingWorld Representatives, defined as any personnel undertaking tasks on behalf of UnitingWorld, as described in the Governance Framework. It applies to activities in Australia as well as overseas.

Financial wrongdoing includes:

- Fraud
- Corruption
- Bribery
- Facilitation payments, whether paid directly or indirectly, regardless of local custom or practice
- Foreign bribery, including conduct that may expose UnitingWorld to liability for failure to prevent foreign bribery by associated persons
- Money laundering
- Terrorism financing
- Breach of sanctions imposed by the Australian Government
- Theft or misappropriation of funds, assets or property
- False accounting, forgery, or unauthorised alteration of financial or official documents
- Creating unauthorised liabilities or financial commitments on behalf of UnitingWorld
- Wrongful or unauthorised use of UnitingWorld funds, assets, information or intellectual property
- Failure to declare or appropriately manage a conflict of interest in relation to financial or program decisions
- Actions intended to obtain improper personal or organisational advantage, including non-monetary benefits such as influence, status or access to information
- Serious negligence, or failure to follow required financial controls or reporting obligations, where this results in misuse, loss or diversion of UnitingWorld resources
- Any other unlawful or criminal activity involving the misuse of UnitingWorld funds, assets or resources

3 Policy Commitments

Principle 1: We will promote a culture of honesty, integrity and trust; cultivating an ethical and transparent environment where everyone is responsible for the stewardship of the organisation's resources and reputation.

Principle 2: We will use policies, procedures and audit mechanisms, including adherence to recognised standards, to manage our finances and identify financial wrongdoing.

Principle 3: We will use risk assessment and management methodology to tailor the way in which we manage financial wrongdoing risks in all of our operations and programs, with more stringent controls for more risky environments.

Principle 4: We will make all reasonable efforts to ensure that our funds are used only for their intended purpose and are not directed to terrorist activities, individuals or organisations linked with terrorism, or other unlawful or criminal activities.

Principle 5: We will act immediately on discovery of any instance of financial wrongdoing, including terrorism financing, in any part of our operations and programs, to stop the wrongdoing, hold perpetrators to account through appropriate corrective or disciplinary action, identify root causes and risks, and implement systemic change to reduce the likelihood of repetition.

4 Policy implementation

4.1 Establishing and maintaining a culture to minimise financial wrongdoing

- UnitingWorld Representatives will be trained to understand and recognise financial wrongdoing, and will sign the UnitingWorld Code of Conduct (Code) under the Professional Conduct Policy to acknowledge their personal responsibilities in preventing, detecting, reporting and responding to it.
- We will support our partners to understand their organisational responsibilities by documenting them in the Memorandum of Understanding (MOU) and Letters of Agreement (LOAs). We will support them by strengthening their capacity to meet their undertakings, including supporting partners to cascade relevant training within their organisations to promote consistent awareness of financial wrongdoing risks and reporting obligations.
- Financial wrongdoing risks, prevention and reporting training will be provided at induction and in regular updates thereafter to ensure Representatives are aware of risks and minimise opportunities for financial wrongdoing. Representatives are expected to be continually aware of the risks of financial wrongdoing and to minimise the opportunities and situations where such wrongdoing can occur.

4.2 Policies and Processes

- UnitingWorld will maintain a Fraud and Corruption Control Framework, which sets out organisational and project-level controls for the prevention, detection and response to financial wrongdoing. The framework is reviewed at minimum every two years.
- The above framework will include a suite of policies and procedures that act together to prevent and address financial wrongdoing. Relevant policies are listed below in Related Resources.
- UnitingWorld will maintain procedures to review project expenditure by partners at regular intervals, and require partners to maintain appropriate record keeping, reporting and audit practices.
- Obligations in the prevention of financial wrongdoing will be covered in all agreements with UnitingWorld Representatives and partner agreements such as MOUs or LOAs.

- Management will complete an annual Fraud and Corruption Control Checklist, which will be submitted to the FAR Committee for review. The FAR Committee will report to the Board regarding findings.
- UnitingWorld will implement practices (informed by DFAT, ACNC and ACFID standards) for financial management and identifying and addressing financial wrongdoing. Our processes for finance and resource management will include (but are not limited to):
 - Application of value for money principles in procurement and expenditure decisions, having regard to cost, quality, risk and fitness for purpose
 - Identification, disclosure and appropriate management of actual, potential or perceived conflicts of interest in financial and programming decisions
 - Application of appropriate segregation of duties and approval controls in financial and resource management processes, proportionate to the level of risk
 - Conduct of financial transactions, where possible, through regulated financial institutions
 - Maintenance of oversight of the whole program and records of assistance provided to program partners and any third parties
 - Conduct of follow-up checks (including internal and external audits) to ensure assistance is delivered as intended and financial records are accurate
 - Undertaking of regular, independent organisational reviews of program partners, including assessment of financial management and controls, to support early identification of risks and proportionate corrective action
 - Provision of periodic counter-terrorism financing and anti-money laundering awareness-raising and training to Representatives, including program partners, based on the level of risk
 - Escalation of suspected fraud or financial wrongdoing promptly in accordance with UnitingWorld's reporting and incident management arrangements
 - Reporting of suspicious activity to relevant funding bodies and/or law enforcement authorities, including the Australian Federal Police, as required
- UnitingWorld will implement practices that support the detection of financial wrongdoing such as routine operational oversight, financial controls, audits, monitoring activities, and reports or complaints. Our processes to identify financial wrongdoing at agency and project levels will include:
 - Internal reviews and office audits
 - Program evaluation and monitoring awareness during reviews
 - Internal audits
 - External audits
 - Robust grievance and investigation procedures

4.3 Risk Management, Mitigation, and Control Measures

- In line with UnitingWorld's Risk Management Policy and Framework, financial wrongdoing risks are identified, monitored and managed through the Agency Risk Register and Project Risk Registers. These risks are reviewed quarterly as part of regular management, committee and

Board oversight, and considered on an ongoing basis through management discussions where changes in risk profile, incidents or emerging issues arise.

- At the project level, financial wrongdoing risks are identified through partner-led risk assessments and documented in Project Risk Registers. These risks are reviewed at least quarterly and updated as required, with oversight by the International Program Manager, supported by the Head of Programs, and escalation to the Agency Risk Register where appropriate.
- UnitingWorld will conduct financial risk assessments as part of establishing new partnerships, new projects or new phases of projects. These processes are supported by regular, independent organisational reviews of partners, including assessment of financial management, to support ongoing due diligence.
- UnitingWorld will have procedures to review expenditure items, including but not limited to credit card use, travel, employee reimbursements, and asset audits.
- UnitingWorld will conduct pre-employment screening in accordance with the Counter Terrorism Screening Procedure.

4.4 Terrorism Financing Prevention

- We will apply terrorism financing prevention measures on a risk-based and proportionate basis, having regard to the nature of activities, operating context and donor requirements.
- We will undertake counter-terrorism screening of Representatives and external organisations who receive funding or other material support from UnitingWorld. This includes, where applicable, staff, Board members, volunteers, contractors, suppliers, and partner staff and organisations.
- We will undertake terrorism checks against:
 - Australian Government Listing of Terrorist Organisations (published via the Attorney-General's Department / Australian National Security listed terrorist organisations list)
 - DFAT Consolidated List
 - Asian Development Bank Sanctions List
 - World Banks Listing of Ineligible Firms and Individuals
 - other relevant lists, as warranted by our risk assessments
- We will take necessary measures to comply with relevant Commonwealth, State and Territory anti-terrorism laws, including Part 5.3 of the Criminal Code Act 1995 (Cth); and Part 4 of the Charter of the United Nations Act 1945 (Cth).
- The frequency with which we screen Representatives against the above-mentioned lists will be determined based on risk, with higher frequency set for higher risk contexts.
- We will maintain a Counter-Terrorism Procedure that details the methodology used to put this policy into practice.
- For UnitingWorld Representatives who are partner staff who access UnitingWorld funds, we will:
 - Use our best endeavours to confirm their identity, credentials and good standing, including, where appropriate, obtaining police and reference checks
 - Require assurances from the program partner that it will not provide funding or make assets available, directly or indirectly, to a terrorist organisation

- Use our best endeavours to ensure the program partner is aware of, and complies with, all applicable laws (whether in Australia or overseas) in respect of counter-terrorism and anti-money laundering, as well as relevant UnitingWorld policies

4.5 Reporting Financial Wrongdoing

- UnitingWorld Representatives will be trained on how to promptly report suspected acts of financial wrongdoing, including any known or suspected links with organisations or individuals associated with terrorism or money laundering. The appropriate parties to report to are one of the following:
 - UnitingWorld National Director
 - Sureka Goringe
 - Phone: +61 (0)2 8267 4267
 - Email: Surekag@unitingworld.org.au
 - Physical address: Level 3, 262 Pitt Street, Sydney, NSW Australia 2000
 - Postal address: PO Box A2266, Sydney South, NSW Australia 1235
 - UnitingWorld Head of Operations
 - Katherine Lynch
 - Phone: +61 (0)2 8267 4267
 - Email: Katherinel@unitingworld.org.au
 - Physical address: Level 3, 262 Pitt Street, Sydney, NSW Australia 2000
 - Postal address: PO Box A2266, Sydney South, NSW Australia 1235
 - Assembly National Director – Strategic Finance and Administration
 - Leo Iosifidis
 - Phone: +61 (0)2 8026 9728
 - Email: Leoi@nat.uca.org.au
 - Physical address: Level 4, 262 Pitt Street, Sydney, NSW Australia 2000
 - Postal address: PO Box A2266, Sydney South, NSW Australia 1235
 - Assembly General Secretary
 - Andrew Johnson
 - Phone: +61 424 373 713
 - Email: gensec@nat.uca.org.au
 - Physical address: Level 3, 42 Macquarie Street, Barton ACT 2600
 - Postal address: PO Box 4097, Kingston ACT 2604
- We will make it clear to Representatives and the public that reporting suspected or substantiated financial wrongdoing relating to UnitingWorld may be done confidentially or anonymously in accordance with UnitingWorld's Whistleblower Policy and Complaints and Incident Handling Policy.

- We will report any suspected or substantiated incident of financial wrongdoing relating to institutional donor funding in accordance with the relevant grant agreement and donor reporting requirements. This includes the reporting of suspected or substantiated fraud and corruption relating to DFAT-funded activities to DFAT, in accordance with grant agreement requirements.
- We will make all mandatory reports to the Australian Charities and Not-for Profits Commission (ACNC) and other statutory bodies as required.

4.6 Investigating Financial Wrongdoing

- Investigations will be prompt and conducted by appropriately skilled and experienced personnel who are suitably at arm's length/independent. They may be UnitingWorld staff if sufficient independence is possible, and may involve external expertise where required by the nature or complexity of the matter, including investigators with qualifications or experience consistent with the Australian Government Investigation Standards (AGIS) or equivalent.
- Investigations will follow UnitingWorld's Complaints and Incident Handling Policy, Whistleblowing Policy and any other relevant procedures.
- We will maintain confidentiality, as appropriate, in accordance with UnitingWorld's Privacy Policy and Whistleblowing Policy.

4.7 Addressing Financial Wrongdoing

- Any substantiated cases of financial wrongdoing by UnitingWorld staff will result in disciplinary action including possible dismissal.
- Actions taken in response to financial wrongdoing will be proportionate to the nature and seriousness of the matter and will include addressing underlying causes and weaknesses in control systems, to prevent recurrence.
- In the case of financial wrongdoing by partner staff working on UnitingWorld funded activities, UnitingWorld will use its strongest influence with the partner organisation to require prompt and appropriate action, including disciplinary action where relevant, and to address underlying management and governance gaps to mitigate future exposure. UnitingWorld may withhold funding until risks are adequately mitigated.

4.8 Action on Discovery of Terrorism Financing

- UnitingWorld will immediately withdraw all support, including funding, if we discover that any partner organisation or contractor is on, or is added to, the Australian Government Listing of Terrorist Organisations or the DFAT Consolidated List.
- UnitingWorld will report to the Australian Federal Police or the National Security Hotline as appropriate any suspicious activity including diversion of funds or resources, or if any link is discovered between funds provided by us and a terrorist organisation or individual terrorist.

5 Roles and Responsibilities

A culture of prevention of Financial Wrongdoing starts with strong leadership and role clarity. At UnitingWorld, the Board, Finance Audit and Risk Committee, National Director, Head of Operations, Management, and staff all have roles in the organisation's risk control.

5.1 Board

- Ensure they conduct themselves ethically.
- Establish policies to support the prevention, detection and response to financial wrongdoing.
- Promote a culture that ensures that prevention of financial wrongdoing is integral to how things are done.
- Monitor and provide oversight of the internal control environment for the prevention of financial wrongdoing.
- Delegate to the National Director the task of implementing policy.

5.2 Finance Audit and Risk Committee

- Work with management to ensure that the policy is effectively implemented.
- Provide advice to the Board on the internal control environment for the prevention of financial wrongdoing.

5.3 National Director

- Provide overall leadership and accountability for the prevention, detection and response to financial wrongdoing.
- Ensure appropriate systems, policies and controls are in place to manage financial wrongdoing risks.
- Model a culture of honesty, integrity and accountability across the organisation.
- Support the Board and Finance, Audit and Risk Committee in discharging their oversight responsibilities.
- Lead the organisational response to significant or systemic incidents of financial wrongdoing, including appropriate escalation, reporting to donors and regulators, implementation of corrective actions, and notification to the Board, in accordance with this policy.

5.4 Head of Operations supported by Head of Finance

- Maintain oversight of areas of higher financial wrongdoing risk across the organisation and ensuring these are identified and managed through risk and compliance processes.
- Oversee regular (including quarterly) risk and compliance reporting relating to the prevention and management of financial wrongdoing and ensuring appropriate staff involvement.
- Manage and coordinate the operational response to incidents of financial wrongdoing, including supporting investigations, implementing corrective actions, and ensuring reporting and escalation occur in accordance with this policy.
- Support the National Director and the Board in discharging their responsibilities.
- Maintain and monitor completion of induction requirements and training relating to financial wrongdoing prevention and response.

5.5 People Managers

- Ensure appropriate screening of potential staff during recruitment for financial wrongdoing risks within their teams, including undertaking verbal referee checks.
- Ensure staff within their teams are aware of, and comply with, financial wrongdoing policies and procedures.
- Identify and manage financial wrongdoing risks relevant to their areas of responsibility.
- Contribute to the identification, management and reporting of financial wrongdoing risks through established risk and compliance reporting processes.
- Model a culture of honesty, integrity and trust within their teams.
- Ensure that responsibilities of partner staff and contractors are documented in relevant agreements and that training is provided where necessary.
- Support induction, awareness and ongoing training of staff within their teams.

5.6 All Staff

- Be familiar with, and comply with, UnitingWorld's financial wrongdoing policies and procedures.
- Act with honesty and integrity in all financial and operational activities.
- Promptly identify and report suspected or actual financial wrongdoing, risks or incidents through established reporting channels.
- Complete induction, training and awareness activities relating to financial wrongdoing prevention and response.

6 Related Resources

- [ACFID Code of Conduct](#)
- [ACT Alliance Anti-Fraud and Corruption Policy](#)
- Conflict of Interest Policy (Adopted-Assembly)
- Complaints and Incident Handling Policy
- Finance Policy
- Procurement Policy
- Risk Management Policy
- Safeguarding and Protection Policy (including Child Protection)
- Whistleblower Policy
- DFAT/Australian Government policies and guidance including but not limited to:
 - Fraud and Corruption Control guidance and toolkit: <https://www.dfat.gov.au/about-us/corporate/fraud-corruption-control>
 - Value for Money Principles: <https://www.dfat.gov.au/aid/who-we-work-with/value-for-money-principles/Pages/value-for-money-principles>

- Bribery and Facilitation Payment guidance: <https://www.ag.gov.au/crime/foreign-bribery>
- Counter Terrorism information and guidance: <https://www.dfat.gov.au/international-relations/security/counter-terrorism/Pages/counter-terrorism>
- Attorney General's Department – Australian National Security, including the Australian Government's listed terrorist organisations: <https://www.ag.gov.au/national-security>

7 Glossary of Terms

All reasonable efforts: The need for positive action and a common-sense approach, based on the level of risk, to meet legal obligations and avoid inadvertently funding terrorist activity or other forms of financial wrongdoing. In the case of anti-money laundering, it refers to a set of laws, regulations and procedures intended to prevent criminals from disguising illegally obtained funds so they appear to have been legitimately obtained.

Associated Person: An associated person is an individual or organisation that performs services for or on behalf of UnitingWorld, including employees, contractors, consultants, volunteers, partners, suppliers or other third parties (see Attorney-General's Department guidance on foreign bribery and "associated persons" - <https://www.ag.gov.au/crime/foreign-bribery/foreign-bribery-resources>).

Australian Government Investigation Standards (AGIS): The Australian Government Investigation Standards (AGIS) are principles issued by the Commonwealth to guide the conduct of investigations, including standards relating to governance, planning, evidence handling and procedural fairness (see Attorney-General's Department – Australian Government Investigation Standards, <https://www.ag.gov.au/legal-system/publications/australian-government-investigation-standards>).

Breach of Sanctions: Violation of sanctions imposed by the Australian Government.

Bribery: 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 Transparency International Anti-Corruption Glossary (<https://www.transparency.org/glossary/term/bribery>).

Conflict of Interest: A situation in which a person's personal, financial, relational or other interests, roles or loyalties could improperly influence, or be perceived to influence, their duties, decisions or actions in connection with UnitingWorld. Conflicts of interest may be real, potential or perceived, and may be direct or indirect. They can include financial interests, personal relationships, influence or loyalty considerations, related-party transactions, or situations where a person holds multiple roles with competing responsibilities or expectations. (adapted from Assembly Conflict of Interest Policy).

Corruption: Any conduct that does or could compromise the integrity, accountability and probity of public administration (Commonwealth Fraud and Corruption Control Framework 2024).

Counter Terrorism: Measures, practices and controls to prevent, detect and respond to terrorism resourcing risks, including ensuring that assets, funds or other resources are not used directly or indirectly to support individuals, groups or activities associated with terrorism (see <https://www.dfat.gov.au/international-relations/security/counter-terrorism/managing-the-risk-of-terrorism-resourcing>).

Facilitation Payments: Facilitation payments are payments of minor value made to secure or expedite a routine government action that should be provided without such payment. (see *Criminal Code Act 1995 (Cth)*, section 70.4; DFAT Fraud and Corruption Control guidance).

Foreign Bribery: Foreign bribery refers to the offering, promising, giving or authorising of a benefit to a foreign public official, directly or indirectly, in order to improperly influence the official in the performance of their duties, including conduct that may expose an organisation to liability for failure to prevent foreign bribery by associated persons under Australian law (see *Criminal Code Act 1995 (Cth)*, Part 7.4; Attorney-General's Department foreign bribery guidance).

Financial Misconduct: Financial misconduct is a form of financial wrongdoing involving dishonest, deceptive or improper behaviour in relation to financial or resource management. It undermines accountability, transparency and trust, and may include, but is not limited to:

- Theft or misappropriation of funds or assets
- False accounting, reporting or documentation
- Bribery or attempted bribery of any person, including foreign public officials
- Facilitation payments
- Kickbacks, collusion or bid-rigging
- Improprieties in procurement or contracting
- Manipulation or misrepresentation of financial information
- Unauthorised use of UnitingWorld funds or resources
- Diversion of funds intended for program beneficiaries
- Any other dishonest or unapproved financial practice intended to benefit a person or entity

(from standard anti-fraud frameworks and the ACT Alliance Anti-Fraud and Corruption Policy: <https://actalliance.org/documents/anti-fraud-and-corruption-policy/>).

Fraud: Dishonestly obtaining (including attempting to obtain) a gain or benefit, or causing a loss, by deception or other means. (Commonwealth Fraud and Corruption Control Framework 2024).

Intellectual Property: The expressions “industrial property” and “intellectual property” are used to describe the rights affording protection to creative and intellectual effort and include copyright, designs, patents, trademarks, circuit layouts, plant varieties and confidential information. (<https://colemangreig.com.au/plain-english-guide-to-intellectual-property/>).

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 (Transparency International Anti-Corruption Glossary).

Proscribed Terrorist Lists: Refers to the lists of suspected terrorists or supporters of terrorists.

Terrorism Financing: refers to the provision, collection or making available of funds, assets or other resources, directly or indirectly, to support terrorist acts or terrorist organisations (see Criminal Code Act 1995 (Cth), Part 5.3; DFAT counter-terrorism guidance).

UnitingWorld Representative: Anyone undertaking tasks on behalf of UnitingWorld.

Whistleblower: A person who reports suspected wrongdoing, including suspicion of fraud, misuse of resources, neglect of duties or a risk to health and safety (ACFID Code of Conduct definition).

8 Review Schedule

Date of next review: March 2031