



MOSES WELFARE FOUNDATION

"Bring Back The Smiles"

Anti-Fraud & Anti-Corruption Policy

Policy Number: MWF-AFAC-001

Version: 1.0

Effective Date: 28 July 2026

Review Date: 28 July 2027

Approved By: Board of Directors, Moses Welfare Foundation

Anti-Fraud & Anti-Corruption Policy

1. Policy Statement

Moses Welfare Foundation (MWF) is committed to conducting all its activities with the highest standards of integrity, honesty, transparency, and accountability. We believe that every donation, grant, and resource entrusted to our organization must be used solely for its intended charitable purpose and managed responsibly for the benefit of the communities we serve.

MWF maintains **zero tolerance** for fraud, bribery, corruption, embezzlement, theft, money laundering, financial misconduct, conflicts of interest, or any unethical behavior that compromises the integrity or reputation of the Foundation.

All Board Members, employees, volunteers, consultants, contractors, partners, and representatives acting on behalf of MWF are required to comply with this policy.

2. Purpose

The purpose of this policy is to:

- Prevent fraud, bribery, and corruption.
- Promote ethical behavior and good governance.
- Protect donor funds and organizational assets.
- Establish responsibilities for preventing and reporting misconduct.
- Ensure all allegations are investigated fairly and confidentially.
- Maintain the confidence of beneficiaries, donors, partners, regulators, and the public.

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*Head Office: Office No: ff49, 1st floor New Liberty Tower, Model Link Road, Lahore
Sub Branch: Bahar Colony No. Kot Lakhapt LHR*





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3. Scope

This policy applies to:

- Board of Directors
- Chairman and Executive Leadership
- Employees
- Volunteers
- Consultants
- Interns
- Contractors
- Suppliers and Vendors
- Partner Organizations
- Temporary Staff
- Agents acting on behalf of MWF

This policy applies to all MWF operations, including:

- Fundraising
- Procurement
- Programmer implementation
- Financial management
- Human resources
- Asset management
- Travel and expense claims
- Grants and sub-grants
- Banking and cash handling
- Partnerships
- Digital and online transactions

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4. Guiding Principles

MWF is committed to the following principles:

- Integrity in every decision.
- Transparency in financial and operational activities.
- Accountability for all resources entrusted to the organization.
- Fairness in procurement and recruitment.
- Compliance with applicable laws and donor requirements.
- Responsible stewardship of charitable funds.
- Prompt reporting and investigation of suspected misconduct.

5. Definitions

Fraud

Any intentional act of deception designed to obtain an unauthorized financial or personal benefit.

Examples include:

- Theft of cash or assets.
- False expense claims.
- Payroll fraud.
- Forged documents.
- Misuse of donor funds.
- Falsified financial reports.
- Procurement fraud.
- Identity fraud.

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Corruption

The abuse of entrusted power for private gain.

Examples include:

- Accepting or offering bribes.
- Kickbacks.
- Nepotism.
- Abuse of authority.
- Undisclosed conflicts of interest.
- Improper influence over procurement or recruitment.

Bribery

Offering, promising, giving, requesting, or accepting anything of value to improperly influence a decision or obtain an unfair advantage.

6. Prohibited Conduct

The following actions are strictly prohibited:

- Theft or misappropriation of organizational assets.
- Bribery in any form.
- Corruption or abuse of authority.
- Embezzlement of funds.
- Falsification of records or reports.
- Forgery.
- Money laundering.
- Bid rigging or procurement manipulation.
- Undisclosed conflicts of interest.
- Favoritism or nepotism in recruitment or contracting.
- Acceptance of inappropriate gifts or hospitality.
- Unauthorized personal use of organizational property.
- Concealing fraudulent activity.
- Retaliation against whistleblowers.

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7. Gifts, Hospitality and Benefits

Personnel must not solicit or accept gifts, hospitality, favors, or other benefits that could influence, or appear to influence, professional judgement.

Modest, culturally appropriate tokens of appreciation may be accepted only where permitted by organizational procedures and where they do not create a conflict of interest.

Cash gifts or cash equivalents must never be accepted.

8. Conflict of Interest

All personnel must avoid situations where personal, financial, family, political, or business interests could conflict with the interests of MWF.

Employees and Board Members must promptly disclose any actual, potential, or perceived conflict of interest.

Where a conflict exists, the individual must remove themselves from the relevant decision-making process.

9. Financial Controls

MWF shall maintain strong internal financial controls, including:

- Segregation of duties.
- Dual authorization for significant payments.
- Accurate accounting records.
- Secure banking procedures.
- Regular reconciliations.
- Supporting documentation for all transactions.
- Budget monitoring.
- Independent financial audits.
- Asset registers.
- Secure cash handling procedures.

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10. Procurement Integrity

Procurement activities shall be conducted fairly, competitively, and transparently.

MWF will:

- Obtain competitive quotations where appropriate.
- Select suppliers objectively.
- Document procurement decisions.
- Avoid conflicts of interest.
- Maintain procurement records for audit purposes.

11. Responsibilities

Board of Directors

The Board shall:

- Approve this policy.
- Promote ethical leadership.
- Monitor organizational compliance.
- Review investigation outcomes where appropriate.

Chairman / Executive Director

The Executive Director shall:

- Ensure effective implementation.
- Promote an ethical organizational culture.
- Allocate adequate resources for internal controls.
- Respond promptly to allegations.

Finance Department

The Finance Team shall:

- Maintain accurate financial records.
- Monitor transactions.
- Conduct reconciliations.
- Report suspicious financial activity.
- Support audits and investigations.

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Employees and Volunteers

Every representative of MWF shall:

- Act honestly and ethically.
- Protect organizational assets.
- Follow financial procedures.
- Report suspected fraud or corruption immediately.
- Cooperate fully with investigations.

12. Reporting Concerns

Anyone who suspects fraud, corruption, bribery, theft, or financial misconduct has a duty to report it immediately.

Reports may be submitted by:

- Employees
- Volunteers
- Beneficiaries
- Donors
- Suppliers
- Contractors
- Community Members
- Partner Organizations

Reports may be made confidentially and, where permitted by law, anonymously.

13. Investigation Procedures

All allegations shall be handled promptly, fairly, and confidentially.

Investigations will:

- Protect evidence.
- Respect confidentiality.
- Ensure procedural fairness.
- Avoid conflicts of interest.
- Be conducted by authorized personnel.
- Recommend corrective actions where necessary.

Where criminal conduct is suspected, MWF may refer the matter to the appropriate law enforcement or regulatory authorities.

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14. Protection of Whistleblowers

MWF encourages the reporting of concerns made honestly and in good faith.

No individual shall suffer retaliation, intimidation, harassment, discrimination, or adverse treatment for reporting suspected misconduct.

Any retaliation against a whistleblower will itself be treated as a serious disciplinary matter.

15. Disciplinary Measures

Violations of this policy may result in:

- Verbal or written warning.
- Mandatory training.
- Suspension.
- Dismissal or termination of employment.
- Termination of contracts or partnerships.
- Recovery of financial losses where legally permissible.
- Referral to law enforcement or regulatory authorities.

16. Record Keeping

MWF shall maintain complete and accurate records relating to:

- Financial transactions.
- Procurement.
- Asset management.
- Investigations.
- Audit findings.
- Conflict of interest disclosures.
- Corrective actions.

Records shall be retained in accordance with applicable legal, donor, and organizational requirements.

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17. Training and Awareness

MWF shall provide regular training on:

- Fraud prevention.
- Anti-corruption standards.
- Ethical conduct.
- Financial accountability.
- Conflict of interest.
- Procurement integrity.
- Reporting procedures.

All new personnel shall receive this training during induction.

18. Monitoring and Compliance

MWF will monitor compliance through:

- Internal controls.
- Financial reviews.
- Management oversight.
- Internal and external audits.
- Risk assessments.
- Periodic policy reviews.

Any weaknesses identified shall be addressed through corrective action plans.

19. Policy Review

This policy shall be reviewed at least annually or sooner if required by changes in legislation, donor requirements, organizational structure, or identified risks.

20. Commitment

Moses Welfare Foundation is committed to ensuring that every donation, grant, and resource entrusted to the Foundation is managed responsibly, ethically, and transparently. We recognize that public trust is essential to our mission, and we will take all reasonable steps to prevent, detect, investigate, and address fraud and corruption.

Through this policy, MWF reaffirms its commitment to integrity, accountability, responsible stewardship, and ethical leadership in every aspect of its work.

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Approval

This Anti-Fraud & Anti-Corruption Policy has been approved by the Board of Directors of Moses Welfare Foundation and is binding on all Board Members, employees, volunteers, consultants, contractors, suppliers, partner organizations, and representatives acting on behalf of the Foundation.

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