

Anti-Fraud, Anti-Corruption and Anti-Money Laundering Policy

Marine Habitat Preservation of the Philippines Inc. (Marine Conservation Philippines)

Version	1.1
Approved by the Board	22 October 2026
Next scheduled review	October 2027, or after any confirmed case
Policy owner	Kiri Simons, General Manager

1. Purpose and Scope

This policy explains how Marine Conservation Philippines (MCP) prevents, detects and responds to fraud, corruption, money laundering and terrorist financing.

It applies to the members of the Board, staff, interns, volunteers, contractors, partners and subgrantees whenever they handle MCP funds or act on MCP's behalf. It covers all funds, including programme fees, donations and grants.

2. Our Commitment

MCP has zero tolerance for fraud, bribery, corruption, money laundering and terrorist financing.

We comply with Philippine law, including the Anti-Money Laundering Act (RA 9160, as amended), the Terrorism Financing Prevention and Suppression Act (RA 10168) and the SEC's guidelines for protecting non-profit organisations from money laundering and terrorist financing (SEC Memorandum Circular No. 15, s. 2018). We also meet the requirements of our donors and grant agreements.

3. What This Policy Prohibits

- **Fraud:** deceiving MCP or others for personal or third-party gain, including false claims, invoices, receipts or timesheets.
- Theft or misuse of MCP funds or property.
- **Bribery:** offering, giving, requesting or accepting anything of value to influence a decision, whether it involves public officials or private parties.
- **Facilitation payments:** small unofficial payments to speed up routine government services such as permits.
- **Money laundering:** hiding the source of money from crime, including by passing it through MCP.
- **Terrorist financing:** providing funds, directly or indirectly, to terrorists or terrorist organisations.
- Splitting purchases or payments to avoid approval limits.

4. How We Prevent It

4.1 We Know Our Donors

Most of our income comes from programme fees paid by identified volunteers and interns. Donations reach us through PayPal, Wise or bank transfer, where regulated payment providers identify the payer, so we do not receive anonymous funds. We issue receipts for cash donations in the donor's name. Before accepting an unusually large donation (above PHP 100,000), we confirm who the donor is. We refuse funds if we cannot confirm their source or if they come from anyone on a sanctions list.

4.2 We Know Our Partners and Suppliers

Before contracting a partner, a subgrantee or a supplier above PHP 200,000, we confirm their identity and check them against the UN Security Council Consolidated Sanctions List. We keep a record of the check.

4.3 Spending and Payments

- A General Manager approves all spending before any money is committed.
- Expenditures above PHP 40,000 also need written approval from a director (four-eyes principle). An email or chat message is enough.
- No single person approves, pays and records the same transaction, except for amounts under PHP 20,000.
- Payments are made online or by bank transfer wherever possible. Cash is limited to small local purchases, always with a receipt or a signed self-issued receipt.
- If a grant agreement sets stricter limits or rules, those apply to that grant's funds.

4.4 Records and Audit

- Every transaction is recorded in Manager.io with its supporting documents attached.
- The bookkeeper reconciles bank accounts monthly. A director reviews the reconciliation and spot-checks a sample of smaller transactions each month.
- Our accounts are audited every year by an independent CPA, and the audited statements are reviewed by the Board.
- We keep records for at least ten years, or longer if a grant agreement requires it.

4.5 Gifts and Hospitality

- We do not give gifts to public officials beyond token value, and never cash.
- Staff dealing with suppliers, contractors, partners or officials on MCP's behalf declare any gift they receive from them worth more than PHP 2,500 to a General Manager, who records it in a gift log.
- Thank-you gifts and tips from volunteers, interns and guests are a private matter and are not covered by this section.

4.6 Conflicts of Interest

Anyone with a personal interest in a decision, such as a family member's business bidding for a contract, must declare that interest and take no part in the decision.

5. Reporting Concerns

Anyone who suspects fraud, bribery, money laundering or other misconduct involving MCP funds should report it to a General Manager, or directly to a director if the concern involves management. Reports can be made by email, in person, or anonymously in writing.

No one will face retaliation for raising a concern in good faith, even if it turns out to be unfounded. Knowingly making a false report is a disciplinary matter.

6. Investigation and Response

- A director will appoint someone independent of the matter to investigate every report promptly and confidentially.
- Confirmed cases result in disciplinary action, up to dismissal, termination of contracts and recovery of funds. They are referred to the police where appropriate.
- Suspected money laundering or terrorist financing is reported to the SEC and, where appropriate, the Anti-Money Laundering Council.
- We inform donors of any suspected misuse of their funds as required by their grant agreements.

7. Responsibilities

- The Board approves this policy and oversees its application.
- The General Managers are responsible for putting it into practice and maintaining the gift log and screening records.
- Everyone covered by this policy must follow it. Staff and long-term interns are introduced to it when they start.

8. Review

The Board reviews this policy every year and after any confirmed case.

How to Reach Us

Email team@mcp.email, or magnus@mcp.email for concerns about management. You can also speak in person to a General Manager or a director, or write to us at Siit Arboretum, Barangay Lutoban, 6218 Zamboanguita, Negros Oriental, Philippines. Written reports do not need to be signed.