
Edge Worldwide Limited

Overseas Compliance Policy

1. Purpose

This Overseas Compliance Policy outlines the procedures and responsibilities of EDGE Worldwide Limited to ensure that all overseas activities align with our charitable purposes and maintain our status as an Australian-registered not-for-profit organization under the Australian Charities and Not-for-profits Commission (ACNC).

2. Governance & Compliance

2.1 Charitable Purpose Alignment

All overseas activities must align with the mission and objectives set out in EDGE Worldwide Limited's constitution.

Activities must contribute directly to the charity's purpose of advancing educational outcomes, social welfare and community development.

2.2 ACNC Compliance

EDGE Worldwide Limited will adhere to the ACNC's "External Conduct Standards (ECS)" for overseas operations.

Annual financial reports and statements will include details of all international activities.

2.3 Board Oversight

The Board of Directors will review and approve all overseas programs, partnerships, and funding allocations.

A formal risk assessment and compliance review will be conducted annually.

3. Financial Management & Fund Transfers

3.1 Control Over Funds

All funds allocated to overseas projects must be used exclusively for charitable purposes.

Financial records will be maintained for every disbursement, including receipts, invoices, and reports.

3.2 Banking & Transparency

Funds will be transferred through secure banking channels, avoiding cash payments whenever possible.

Financial records will be audited annually by an independent auditor.

3.3 Fraud Prevention

Due diligence will be conducted on all overseas partners and staff handling funds.

A whistleblower policy will be implemented to report financial misconduct.

4. Monitoring & Reporting

4.1 Regular Reporting

All overseas programs must submit quarterly progress reports, including financial updates and impact assessments.

EDGE Worldwide Limited will collect photographic, video, and written evidence to verify activities.

4.2 Site Visits & Audits

Representatives from EDGE Worldwide Limited will conduct at a minimum annual site visits to ensure compliance and operational integrity.

Third-party audits may be conducted to confirm financial transparency.

4.3 ACNC & ATO Reporting

Overseas activities will be disclosed in the Annual Information Statement (AIS) submitted to the ACNC.

Compliance with Australian Taxation Office (ATO) requirements will be maintained for any Deductible Gift Recipient (DGR) status activities.

5. Partner & Beneficiary Compliance

5.1 Written Agreements

EDGE Worldwide Limited will enter into formal agreements with all overseas partners outlining funding terms, project objectives, and reporting obligations.

5.2 Legal Compliance in Cambodia

Activities must comply with all relevant Cambodian laws and regulations, including NGO registration and financial reporting obligations.

5.3 Ethical Practices

All activities will adhere to EDGE Worldwide Limited's Child Protection Policy, Fraud and Corruption Control Policy, and Human Rights Guidelines.

Staff and volunteers must complete training on ethical engagement and safeguarding practices.

6. Risk Management

6.1 Risk Assessments

A risk assessment will be conducted for all overseas programs to identify and mitigate financial, legal, and operational risks.

Risk assessments will be reviewed annually by the Board.

6.2 Insurance & Protection

EDGE Worldwide Limited will maintain adequate insurance coverage for personnel and operations in Cambodia.

Protective measures will be in place to safeguard vulnerable beneficiaries from exploitation or harm.

7. Reporting & Supervision of Overseas Activities

7.1 Monitoring Process

EDGE Worldwide Limited will establish clear performance indicators for each overseas project.

Project coordinators will conduct quarterly check-ins with local partners to assess progress and resolve issues.

A designated Compliance Officer will oversee adherence to policies and regulations.

7.2 Frequency of Reporting

Overseas programs must provide quarterly progress reports detailing financial expenditures, project milestones, and community impact.

Annual impact assessments will be conducted to measure project effectiveness.

7.3 Information Reported

Reports must include financial records, receipts, invoices, narrative summaries, and photographic evidence.

Any deviations from planned activities or budget discrepancies must be immediately reported to the Board.

8. Monitoring & Security of Bank Transactions

8.1 Transaction Oversight

All overseas transactions will be reviewed by the Secretary before approval.

A dual-authorisation system will be in place for fund transfers to prevent unauthorised transactions.

8.2 Fraud Detection & Reporting

Bank transactions will be monitored monthly to identify any suspicious activities.

An internal Fraud and Corruption Control Policy will outline steps for investigating and reporting financial irregularities.

Any unauthorised transactions will be reported to the Board within 24 hours and corrective action will be taken.

9. Compliance with Australian Laws on Funding & Resources

EDGE Worldwide Limited is committed to ensuring that all funds, equipment, supplies, and other resources provided to third parties outside Australia (or within Australia for use overseas) comply with Australian laws, including:

- Money laundering prevention: Funds will only be transferred through secure and verifiable financial institutions with anti-money laundering protocols.
- Terrorism financing: EDGE Worldwide Limited will conduct due diligence on all partners to ensure no involvement with terrorist organisations.
- Sexual offences against children: All personnel and partners must comply with EDGE Worldwide Limited's Child Protection Policy, and all funding recipients must provide child safeguarding assurances.
- Slavery & slavery-like conditions: The organisation strictly prohibits the use of forced labour in any funded project and requires transparency in partner employment practices.
- Trafficking in individuals & debt bondage: All partners must comply with anti-trafficking laws and demonstrate ethical labor practices.
- People smuggling: No funds or resources will be used to support or facilitate illegal migration activities.
- International sanctions: EDGE Worldwide Limited will ensure compliance with Australian Government sanctions and will not engage in transactions with sanctioned entities.
- Taxation compliance: All funds transferred abroad will be accounted for in accordance with Australian taxation laws.
- Bribery & corruption prevention: EDGE Worldwide Limited maintains a zero-tolerance policy on bribery and requires all partners to adhere to anti-corruption laws.

10. Policy Review & Amendments

This Overseas Compliance Policy will be reviewed annually by the Board of Directors.

Any amendments must be approved by the Board and aligned with Australian regulatory requirements.

11. Approval & Adoption

This policy was approved by the Board of Directors on 17th March 2025

Signed: _____

Position: Treasurer

Date: 17/03/2025