



## Ethics, Compliance, and Audit Services Charter

### ***PURPOSE AND MISSION***

The objective of the Office of Ethics, Compliance, and Audit Services (ECAS) is to assist the Board of Curators, executive leadership, and management in the effective performance of their responsibilities by reviewing and advising them on financial and operational internal controls, information technology controls, and compliance with university policies, procedures, and applicable laws and regulations. ECAS includes three primary functions: Internal Audit, Compliance, and Privacy. Additional functions include central investigations and custodian of records. The Internal Audit team serves as the University of Missouri's (University) internal auditor.

**Internal Audit:** The mission of the Internal Audit team is to provide independent, objective assurance and advisory services designed to add value and improve the University's operations. It helps the University accomplish its objectives by bringing a systematic, disciplined approach to evaluate and improve the efficiency and effectiveness of risk management, control, and governance processes by providing internal audits and reviews, management consulting and advisory services, investigations of fraud and abuse, and follow-up of audit recommendations.

**Compliance:** The University of Missouri compliance team is dedicated to ensuring the University meets its legal, regulatory, and institutional obligations while upholding the highest standards of ethics and integrity. The compliance team proactively promotes ethical conduct through comprehensive education, training, guidance, and oversight of University of Missouri compliance programs with the goal of fostering an organizational culture that encourages ethical conduct and a commitment to compliance with the law.

**Privacy:** The privacy team is a valued partner and advisor to the University community on privacy compliance matters. They help develop privacy policies, notices, standards, and processes, provide guidance and training on privacy laws, policies, and best practices, and assist with investigations and responses to campus privacy breaches or incidents.

### ***PROFESSIONAL STANDARDS***

The Internal Audit team adheres to the mandatory elements of the *International Professional Practices Framework Global Internal Audit Standards* and *Topical Requirements* and additional mandatory guidance as required, published by The Institute of Internal Auditors (The IIA). These Standards guide the worldwide professional practice of internal auditing.

Compliance is charged with implementing guidance provided by the Federal Guidelines on Effective Compliance and Ethics Programs (USSG §8B2.1), the Department of Justice, and the Office of Inspector General and ensuring these elements are in place system wide.

The Privacy team adheres to the Fair Information Practice Principles (FIPPs), developed by the



U.S. Department of Health, Education, and Welfare in 1973 and incorporated into the Privacy Act of 1974. The team also complies with other state and federal laws and privacy laws in many nations and international organizations.

### ***INDEPENDENCE***

All ECAS activities shall remain free of influence by any element in the organization, including matters of audit selection, scope, procedures, frequency, timing, or report content to permit maintenance of an independent and objective mental attitude necessary in rendering reports. ECAS personnel shall have no direct operational responsibility or authority over any of the activities they review. Accordingly, they shall not develop or install systems or procedures, prepare records, perform management functions, or engage in any other activity that would normally be audited or reviewed.

### ***AUTHORITY***

ECAS personnel report to the Chief Audit and Compliance Officer (CACO), who reports functionally to the Board of Curators through the Audit, Compliance and Ethics Committee and administratively to the Executive Vice President of Finance and Operations and Chief Financial Officer (CFO). Direct accountability to the Board promotes independence, objectivity, and full consideration of audit recommendations and management action plans.

Under direction of the CACO, ECAS:

- Has authority to review, audit, or investigate all areas of the University, except the teams which reside in the same ECAS office. When needed, these teams will be reviewed, audited, or investigated using alternative processes such as engaging with an objective, competent external assurance provider.
- Has unrestricted access to all functions, records, data, personnel, and physical property relevant to performing audits, reviews, investigations, and consulting services.
- Has authorization to allocate resources, set frequencies, select subjects, determine scopes of work, and apply the techniques required to accomplish audit, consulting, review, and investigation objectives.
- Has authorization to obtain the necessary assistance of personnel in units of the organization where they perform audits, reviews, investigations and other specialized services from within or outside the University.

### ***RESPONSIBILITY***

The CACO and ECAS have the responsibility to:

- Develop flexible annual plans using appropriate risk-based methodology, including risks or control concerns identified by management, and submit that plan to the President, CFO, the Audit, Compliance and Ethics Committee, and Board of Curators.
- Implement the annual plans, as approved, including, and as appropriate, any



special tasks or projects requested by management, the Audit, Compliance and Ethics Committee and/or the University Board of Curators.

- Support the President, senior management, and the University Board of Curators, as requested.
- Maintain a professional staff with sufficient knowledge, skills, experience, and professional certifications.
- Maintain confidentiality. Documents and information given to ECAS staff will be handled in the same prudent and confidential manner as by those employees normally accountable for those records.

Internal Audit specific responsibilities:

- Follow-up on management's progress in implementing internal audit recommendations.
- Perform consulting and advisory services, beyond internal auditing assurance services, to assist management in meeting its objectives.
- Investigate allegations of fraud, waste, abuse, and other wrongdoing.
- Establish and implement a quality assurance improvement program of internal auditing activities.
- Maintain an anonymous reporting hotline. Reports any findings of wrongdoing for follow-up at appropriate administrative level. CACO maintains full independence to investigate all reports.

Approved by the Board of Curators on September 12, 2024.