

## MiFID II and MiFID IV statement

It's crucial to understand that MiFID II (Markets in Financial Instruments Directive II) and its related regulations like MiFIR (Markets in Financial Instruments Regulation) are primarily designed for investment firms and those providing financial services. Therefore, a standard "MiFID II/MiFIR policy" isn't generally applicable to a non-profit organization like The Goodwill Revolution, which focuses on providing charitable support.

However, it's important to understand the core principles of those regulations, and how they could be very loosely related to how TGR operates, in regards to best practices.

Here's a breakdown of why a direct MiFID II/MiFIR policy is likely unnecessary, and how to approach related principles:

### Why MiFID II/MiFIR Primarily Doesn't Apply:

- **Scope:**
  - MiFID II/MiFIR regulates firms that provide investment services, such as:
    - Investment advice
    - Portfolio management
    - Execution of trades
  - TGR's activities, which focus on providing support to individuals in need through referrals and distribution of goods/services, do not fall within this scope.
- **Financial Instruments:**
  - MiFID II/MiFIR deals with the trading of financial instruments (stocks, bonds, derivatives, etc.).
  - TGR does not engage in the trading of these instruments.

### Relevant Principles and Best Practices:

Although a formal MiFID II/MiFIR policy isn't needed, TGR can adopt related principles to ensure ethical and transparent operations:

- **Transparency:**
  - Maintain clear records of all financial transactions.
  - Provide clear information to donors and referrers about how funds are used.
  - Publish annual reports or financial statements.
- **Investor Protection (in a Broad Sense):**
  - Ensure that donated funds are used responsibly and for the intended purposes.
  - Implement robust safeguarding procedures to protect beneficiaries.
  - Maintain clear communication with referrers and beneficiaries.
- **Record Keeping:**
  - Maintain accurate and secure records of all donations, expenditures, and referrals.
  - Comply with GDPR and other data protection regulations.

- **Conflicts of Interest:**

- Establish clear policies to prevent and manage conflicts of interest among trustees, staff, and volunteers.
- Although TGR does not deal with financial instruments, it is important to insure that no one inside of the organisation is using their position for financial gain.

**Recommendation:**

Instead of a MiFID II/MiFIR policy, TGR should focus on:

- A strong financial governance policy.
- A robust safeguarding policy.
- A comprehensive GDPR and data protection policy.
- Clear and transparent operational procedures.

By focusing on these core areas, TGR can ensure that it operates ethically, responsibly, and in the best interests of its beneficiaries.