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## Board Policy – Preventing Fraud, Bribery and Corruption

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<b>Purpose</b>	To outline the commitment, approach and principles for preventing, detecting, investigating and responding to fraud, bribery and corruption.
<b>Applies to</b>	All employees and any person undertaking work for our Organisation, including contractors working under our operational control and their agents or employees.
<b>Introduction</b>	<p>Fraud is defined as dishonest activity causing actual or potential gain or loss to any person or organisation.</p> <p>General examples of fraud (that can occur internally or externally):</p> <ul style="list-style-type: none"><li>• financial theft or misappropriation of cash or assets;</li><li>• improper or unauthorised expenditure;</li><li>• conduct that adversely affects, or that could adversely affect, the honest or impartial exercise or performance of duties. This includes our dealings with public officials;</li><li>• offering or accepting payment or another reward as an inducement to act (or refrain to act) for benefit (examples include promises, gifts, awarding a contract);</li><li>• unauthorised or inappropriate access to or release of information;</li><li>• forgery and alteration of documents;</li><li>• inappropriate use of insider knowledge;</li><li>• misappropriation or misallocation of organisational resources, such as computer or telecoms equipment;</li><li>• inappropriate or favourable treatment of associated parties;</li><li>• disclosure of competitor information in tender process;</li><li>• failure to disclose a conflict of interest;</li><li>• falsification of records and data, such as payment, timesheet or payroll records or skills and qualifications at the time of onboarding; and</li><li>• fraudulent financial reporting.</li></ul>
<b>Policy</b>	<p>The organisation is committed to compliance with anti-bribery laws as set out in division 141 of the Criminal Act 1995 (Cth), which prohibits bribery of Commonwealth or foreign public officials.</p> <p>Moreover, we expect our employees and service providers to conduct themselves in line with the highest ethical standards. We are committed to preventing fraud, bribery and corruption efforts so that fraud risks are understood, effectively managed and reported.</p> <p>Where instances of fraud, bribery or corrupt behaviour are identified, these will be investigated, and appropriate action taken. Where appropriate, matters will be reported to the relevant law enforcement agency and/or regulator.</p>
<b>Key Principles</b>	<p>The principles for fraud, bribery and corruption prevention aim to:</p> <ul style="list-style-type: none"><li>• set the “tone at the top” by promoting a culture that supports our values and behaviours;</li><li>• encourage openness, integrity and accountability to promote the disclosure of fraud, bribery and corruption matters in accordance with our Code of Conduct and Whistleblower policies;</li></ul>

- identify potential areas of fraud, bribery and corruption and evaluate, on a risk basis, the effectiveness of the associated preventive and detective controls;
- place a high value on maintaining probity in all our activities and dealings with others including execution of the External Partner Code of Conduct;
- continue to improve our performance including acting on process failures where non-compliance is identified or where fraud controls have failed;
- identify and assess potential conflicts of interest and manage or avoid as appropriate; and
- monitor and report on high fraud and corruption risk areas.

**Key Requirements**

The organisation will implement robust systems and processes to prevent, detect and manage fraudulent or corrupt behaviour, including inappropriate payments to and relationships with public officials (e.g.: regulators or government agencies).

These systems and processes include establishing and maintaining:

- a fraud, bribery and corruption risk assessment;
- an independent whistleblower hotline;
- strong financial delegations;
- controls including documenting policies and procedures to prevent and detect fraud, bribery and corruption;
- centralised and consistent controls with transparency to senior management, where possible; and
- best practice standards and protocols for system administration access controls over operational and financial systems.

**Governance & Responsibility**

The Chief Executive Officer (**CEO**), and the Executive Leadership Team (**ELT**) are responsible for allocating adequate resources to prioritise the development, implementation maintenance, and ongoing compliance monitoring of fraud, bribery and corruption prevention requirements across the business, and across the three lines of defence as appropriate.

**Management** and **Every Employee** have responsibility for understanding potential exposure to fraud, bribery and corruption, and ensuring adequate internal controls are in place for the management of fraud risks within their area of responsibility, including processes for monitoring their effectiveness. Every employee needs to apply the principles of this policy to make good decisions as part of their day-to-day activities and take accountability of the outcomes relating to their own actions.

**1<sup>st</sup> line of defence (1LOD)** – Performs the day-to-day activities in accordance with the principle of this policy. The business identifies, analyses, evaluates, treats, monitors, potential areas of fraud, bribery or corruption.

**2<sup>nd</sup> line of defence (2LOD)** –The 2LOD sets the policy and facilitates the fraud risk assessment. Where appropriate, it tests controls and provides assurance to the ELT through risk and control effectiveness oversight. The 2LOD is led by the Group Executive – Legal, Governance & Property (**GE-LGP**) supported by the Audit, Risk & Compliance Team.

**3<sup>rd</sup> line of defence (3LOD)** – Internal Audit provides independent and objective assurance on the effectiveness of fraud controls and governance processes. Along with the management of the whistleblower hotline and investigation of

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potential cases of fraud, bribery or corruption, they challenge the risk assessments, analyse and report the aggregate position to the ELT and the Board and identify improvement opportunities.

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