

# **ANTI-BRIBERY, CORRUPTION AND FRAUD CONTROL POLICY**

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Approved November 2022

## Document Control

Version #	Reviewed By	Date	Endorsed By	Date	Approved By	Date	Summary of Change
01	GM BOP	June 2020	ARMC	June 2020	Board	July 2020	New Document. Created an Anti – Bribery, Corruption and Fraud Control Policy
02	Risk and Compliance Manager	Oct 2022	ARMC	Nov 2022	Board	Nov 2022	Change in roles and responsibilities and alignment to the procedure document.
<b>Document Owner</b>							<b>Risk and Compliance Manager</b>
<b>Document Classification</b>							<b>Governance</b>
<b>Related Documents</b>							
Anti – Bribery, Corruption and Fraud Control Procedure							
Code of Conduct							
Credit Card Policy							
Delegations of Authority							
Procurement Policy							
Procurement Procedures							
Risk Management Policy							
Risk Management Procedures							
Compliance Management Policy							
Compliance Management Procedure							
Escalation Procedure							
Whistleblower Policy							
<b>Review Requirements</b>							
This document is due for review in June 2024 by the Risk and Compliance Manager							
<b>Controlled Document Location</b>							

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# ANTI-BRIBERY, CORRUPTION AND FRAUD CONTROL POLICY

## 1 Purpose

The purpose of this policy is to outline the minimum requirements and responsibilities for the governance, prevention, detection, and the response to suspected bribery, corruption and fraud within Dairy Australia.

## 2 Scope

This policy applies to all Dairy Australia employees including fixed term, casual, Dairy Australia directors and contractors. This policy must be read in conjunction with the *Anti - Bribery, Corruption and Fraud Control procedure, Code of Conduct, Whistleblower Policy, Procurement Policy and Conflict of Interest Policy*.

## 3 Policy Statement

Fraud, corruption, and bribery have the potential to cause significant financial, reputational and service delivery harm to Dairy Australia. These forms of wrongdoing also have a potential to diminish or destroy community confidence in Dairy Australia. Accordingly, Dairy Australia has a zero tolerance towards bribery, fraud and corruption and is committed to effectively preventing, detecting and responding to incidents of bribery, fraud and corruption.

## 4 Policy Principles

- Dairy Australia personnel must not engage in, assist in or cover up fraudulent or corrupt behaviour
- Dairy Australia will not approve or be party to any irregular or illegal payments or benefits in kind where a Third Party could reasonably perceive that their purpose is to win or retain business, to influence a business decision, or in connection with the improper performance of a recipient's duties
- employees and management are aware of their responsibilities for identifying corrupt or fraudulent activities and establishing controls and procedures for preventing such activities and/or detecting such activities when they occur
- all staff are actively encouraged to report suspected incidents of bribery, fraud and corruption
- allegations of bribery, fraud and corruption are promptly dealt with and adequate investigation standards are followed
- clearly communicated and understood policies and procedures that give guidance to employees.

## 5 Roles and Responsibilities

The table below documents relevant roles and responsibilities:

Role	Responsibilities
Employees and Contractors	<ul style="list-style-type: none"> <li>• play an active role in the prevention and detection of fraud as part of their normal responsibilities, supported by the Anti - Bribery, Corruption and Fraud Controls Procedures, the Anti - Bribery, Corruption and Fraud Control Plan, the Code of Conduct and other Dairy Australia policies and procedures documents</li> <li>• are encouraged to direct any questions, concerns or suggestions regarding this policy to their Managers, members of the Leadership Team and/or the Managing Director and/or the Board</li> <li>• are prohibited from:               <ul style="list-style-type: none"> <li>○ offering, promising, giving or authorising, directly or indirectly, anything of value to or for the benefit of any person (whether in the public or private sector) in order to obtain any business or other advantage for Dairy Australia, themselves, or their family, friends, associates or acquaintances</li> <li>○ soliciting, accepting, agreeing to accept or receiving (whether for the benefit of Dairy Australia, their own benefit or that of their family, friends, associates or acquaintances) anything of value from any person (whether in the public or private sector) in return for providing any business or other advantage</li> <li>○ otherwise using illegal or improper means (including Bribes, favours, blackmail, financial payments, inducements, secret commissions or other rewards) to influence the actions of others</li> <li>○ acting as an intermediary for a Third Party in furtherance of any of the foregoing acts by the Third Party</li> </ul> </li> <li>• paying any Facilitation Payments, whether legal or not in a country</li> </ul>
Managers	<ul style="list-style-type: none"> <li>• responsible for the effectiveness of the internal control environment including fraud control prevention and detection</li> <li>• promote the importance of personal and professional ethics among their staff</li> <li>• prompt and appropriate action on all disclosures of suspected fraud</li> <li>• conduct Fraud Risk Assessments when required</li> <li>• develop strategies to combat identified risks for inclusion in an Anti - Bribery, Corruption and Fraud Control Plan and implementation of that Plan</li> <li>• ensure Procurement Policy and financial processes are known and understood by reporting staff and followed</li> </ul>
General Managers	<ul style="list-style-type: none"> <li>• strategy adoption, coordination and implementation (including Fraud Risk Assessments and development and implementation of an Anti - Bribery, Corruption and Fraud Control Plan)</li> </ul>
Board of Directors	<ul style="list-style-type: none"> <li>• ensure there is a robust risk management process in place, including areas relating to bribery, fraud and corruption control</li> </ul>

Role	Responsibilities
Audit and Risk Management Committee	<ul style="list-style-type: none"> <li>ensure an appropriate Anti - Bribery, Corruption and Fraud Control Plan exists</li> <li>discuss with the external auditor the auditing procedures adopted to ensure that the financial statements are not materially misstated as a result of fraud</li> </ul>
General Manager Human Resources	<ul style="list-style-type: none"> <li>coordinate internal disciplinary action processes</li> <li>responsible for personnel issues arising from an investigation</li> <li>ensure that new employees are aware of critical policies including the Code of Conduct and the Whistleblower Policy</li> </ul>
Legal Manager	<ul style="list-style-type: none"> <li>manage recoveries and/or legal action</li> </ul>
General Manager - Business and Organisational Performance	<ul style="list-style-type: none"> <li>coordinate the implementation of all anti - bribery, corruption and fraud control strategies</li> <li>follow up on actions required as part of the Anti - Bribery, Corruption and Fraud Control Plan</li> <li>coordinate an annual Fraud Risk Assessment</li> </ul>

## 6 Compliance and Assurance

- The Risk and Compliance Manager must ensure appropriate monitoring compliance processes are in place for this Policy
- Significant breaches of this Policy should be recorded and reported under the Escalation Procedure

## 7 Review

In line with Dairy Australia's Policy Governance Policy, this policy is scheduled for review every two years or more frequently if appropriate.