

1. Anti-Bribery, Fraud & Corruption Policy

2. Values Statement

Bribery, Fraud and Corruption hurt the very communities we seek to support. The impact goes beyond those responsible, the communities impacted, and the organisations involved, including RedR Australia ("RedR"). It is in everyone's interests to report, bribery, fraud, and corruption.

3. Purpose

The purpose of this policy is to:

- Set out RedR's responsibilities, and the responsibilities of those working for RedR or associated with RedR, in observing and upholding RedR's zero tolerance for bribery, fraud and corruption; and
- Provide information and guidance on how to recognise and respond to bribery, fraud, and corruption issues.

4. Scope

This policy applies to:

- Board members
- All employees, volunteers, contractors, and interns/work placements of RedR
- Associate trainers
- RedR deployees
- Roster members

In this policy "third party" means any individual or organisation RedR members may come into contact with during the course of their work for RedR. This applies to actual and potential customers, suppliers, distributors, business contacts, agents, advisers, government and public bodies, including their advisors, representatives and officials, politicians and political parties.

The policy does not address all possible situations that may arise within the wide range of activities carried out by and through RedR but provides a process that can be applied in most situations.

This policy should be read in conjunction with RedR's Fraud Control Strategy, the RedR Australia Code of Conduct and extended to other policies where appropriate, as these documents set out the expectations of RedR members and provide support to this policy.

5. Policy Statement and Principles

RedR takes a zero-tolerance approach to bribery, fraud and corruption and is committed to conducting business in an honest and ethical manner. RedR has adopted this policy to communicate this message to RedR members and to assist those working for RedR in upholding it.

Bribery, fraud and corruption threats can affect every aspect of RedR's operations. Therefore, the management of these threats is an integral part of good governance. RedR recognises

the importance of managing these threats and has implemented this policy to define the system of processes and procedures in place to manage bribery, fraud and corruption.

It is RedR's expectation that those with whom we do business take a similar zero-tolerance approach to bribery, fraud and corruption.

What is bribery, fraud, and corruption?

The **Australian Standard AS8001-2021: Fraud and Corruption Control** (AS 8001:2021) defines **corruption** as "dishonest activity in which a person associated with an organisation (e.g. director, executive, manager, employee or contractor) acts contrary to the interests of the organisation and abuses their position of trust in order to achieve personal advantage or advantage for another person or organisation. This can also involve corrupt conduct by the organisation, or a person purporting to act on behalf of and in the interests of the organisation, in order to secure some form of improper advantage for the organisation either directly or indirectly."

The **AS8001-2021** defines **fraud** as "dishonest activity causing actual or potential gain or loss to any person or organisation including theft of moneys or other property by persons internal and/or external to the organisation and/or where deception is used at the time, immediately before or immediately following the activity."

AS8001-2021 defines **bribery** as "offering, promising, giving, accepting or soliciting of an undue advantage of any value (which could be financial or non-financial), directly or indirectly, and irrespective of location(s), in violation of applicable law, as an inducement or reward for a person acting or refraining from acting in relation to the performance of that person's duties."

6. Procedures

6.1 RedR's Approach to bribery, Fraud and Corruption

- a) RedR has a zero-tolerance approach to bribery, fraud and corruption. In line with this approach RedR has implemented mechanisms to minimise the occurrence of bribery, fraud or corruption occurring. This includes a range of preventative, detective and responsive measures, which are detailed within the Fraud Control Strategy.
- b) RedR conducts a Bribery, Fraud and Corruption Risk Assessment at least every two years. RedR also updates their Fraud Risk Register quarterly, in preparation for the Audit and Risk Committee.
- c) RedR provides awareness training in relation to bribery, fraud and corruption to all RedR members on an annual basis.
- d) RedR encourages RedR members to report incidents of suspected bribery, fraud and corruption. RedR members may report incidents to:
 - o Internal Channels: CFO, or line managers (Note: line managers will be required to refer the incident to the CFO).
 - o External Channels: Whistleblowing Stoptline1, or Public Interest Disclosures ("PID").
- e) RedR will seek prosecution against those that commit bribery, fraud or corruption against RedR.
- f) The flow chart in Section 8 of this policy is the "Bribery, Fraud and Corruption Reporting Process". This flow chart is intended to guide RedR members on how to report suspected incidents of bribery, fraud and corruption.
- g) RedR identifies the roles and responsibilities in regard to bribery, fraud and corruption preventative, detective and responsive measures.
- h) RedR's approach to bribery, fraud and corruption takes into consideration contractual and other obligations. This includes the contractual obligation it has with its donors, for example, the Australian Department of Foreign Affairs and Trade ("DFAT").

- i) RedR's Anti-Bribery, Fraud and Corruption Policy is supported by a Fraud Control Strategy, which further articulates RedR's approach to bribery, fraud and corruption.

6.2 RedR Members Responsibilities

- a) All RedR members must ensure that they read, understand and comply with this policy at all times.
- b) All RedR members must be open about Gifts and Benefits given or received and must disclose these to their line manager in advance (where it is possible to do so, or as soon as possible afterwards).
- c) All RedR members must remain alert to indicators of possible bribery, fraud or corruption.
- d) The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for RedR or under RedR's control. All RedR members are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- e) All RedR members must notify their manager or the CFO as soon as possible if they believe or suspect that a conflict with this policy has occurred or may occur in the future. For example, if a customer or potential customer offers a RedR member something to gain a business advantage with RedR or indicates to the RedR member that a gift or payment is required to secure their business.
- f) Any RedR members who breaches this policy may face disciplinary action, which could result in dismissal for gross misconduct.
- g) RedR reserves the right to terminate the contractual relationship with an individual or organisation if they breach this policy.

7. Roles and Responsibilities

RedR's roles and responsibilities in regard to bribery, fraud and corruption are identified in the Fraud Control Strategy. Specific roles and responsibilities in regard to this policy are detailed below:

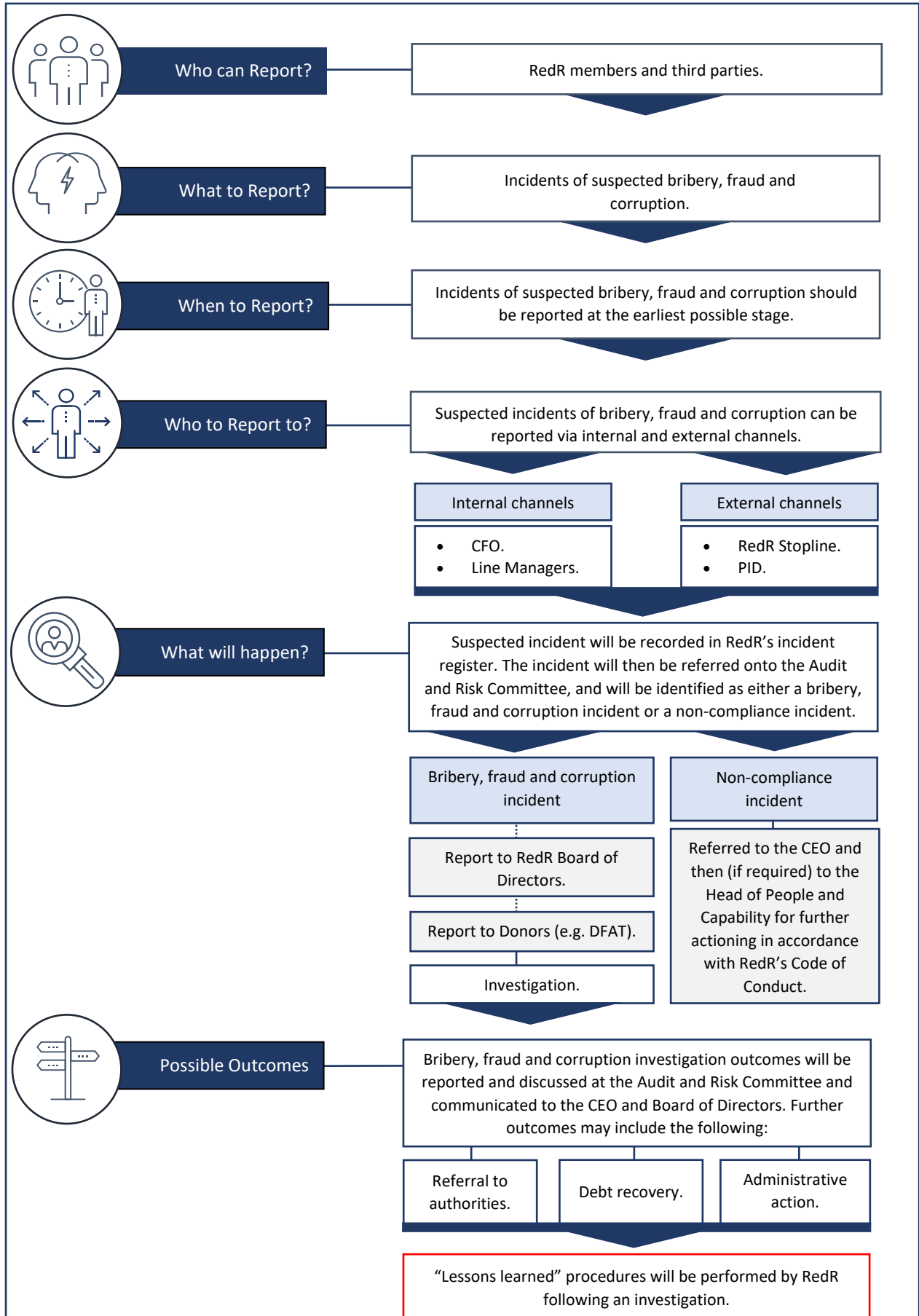
7.1 Responsibility for the Policy?

- a) RedR's Board of Directors has overall responsibility for ensuring this policy complies with all relevant legal and ethical obligations, and that all those under RedR's control comply with it.
- b) This policy is endorsed by the CEO.
- c) This policy is endorsed by the RedR Board.
- d) This policy is implemented by the CFO.
- e) It is the responsibility of the CFO and their delegates to implement this policy, and to monitor its use and effectiveness. The CFO can be contacted about this policy.

7.2 Monitoring and review

- a) The CFO and their delegates will monitor the effectiveness and review the implementation of this policy, considering its suitability, adequacy and effectiveness. Improvements identified will be made as soon as possible.
- b) All RedR members are responsible for the success of this policy and should ensure they use it to disclose any suspected danger or wrongdoing.
- c) RedR members are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to the CFO
- d) RedR reserves the right to vary and/or amend the terms of this policy periodically and at its absolute discretion.

8. Flow Chart



9. Definitions

Bribery	Is offering, promising, giving, accepting or soliciting of an undue advantage of any value (which could be financial or non-financial), directly or indirectly, and irrespective of location(s), in violation of applicable law, as an inducement or reward for a person acting or refraining from acting relation to the performance of that persons duties.
Corruption	Corruption is behaviour that may involve fraud, theft, misuse of position or authority or other acts that are unacceptable to an organisation and which may cause loss to the organisation, its clients or the general community. It may also include such elements as breaches of trust and confidentiality. The behaviour need not necessarily be criminal. The Standard on Fraud and Corruption Control defines corruption as dishonest activity in which a director, executive, manager, employee or contractor of an entity acts contrary to the interests of the entity and abuses their position of trust in order to achieve some personal gain or advantage or for another person or entity.
Corrupt Conduct	includes the performance of a dishonest (not impartial) act, breach of trust or misuse of information or material acquired. Further, where proved, it can be a criminal offence or treated as a disciplinary breach providing reasonable grounds for termination of employment / services.
Fraud	is dishonest activity in which a director, executive, manager, employee or contractor of an entity acts contrary to the interests of the entity and abuses their position of trust in order to achieve some personal gain or advantage for themselves or for another person or entity.
Investigation	a search or collation of evidence connecting or tending to connect a person with conduct that infringes criminal law or the policies of RedR.
Public Interest Disclosures	includes conduct which, in the view of a whistle-blower, incorporates activity that is: <ul style="list-style-type: none"> • Dishonest • Corrupt • Fraudulent • Illegal • In breach of Commonwealth or state legislation or local by-laws • Unethical, either representing a breach of the RedR's Code of Conduct, or generally • Unsafe work practices • Conduct which may cause financial or other loss to RedR • Negligent or improper management of resources resulting in a substantial waste of public funds • Substantial and specific dangers to public health or safety, or to the environment
Third Party	means any individual or organisation engaged with during employment and includes actual and potential customers, suppliers, distributors, business contacts, agents, advisers, government and public bodies, including their advisors, representatives and officials, politicians and political parties.
Whistle-blower	is a person who makes, attempts to make, or wishes to make a report in connection with Public Interest Disclosures, as defined, and where the whistle-blower wishes to avail themselves of protection against reprisal for

Anti-Bribery, Fraud & Corruption Policy

having made the report. A whistle-blower may or may not wish to remain anonymous.

10. Related Policies and Documents

RedR Staff Terms and Conditions
Ethics (Whistleblowers) Policy
Code of Conduct
RedR Fraud Control Strategy
RedR Conflict of Interest Policy

11. Document Control

Reviewed by:	P&C Manager
Approved by:	CFO
Review date:	September 2023
Next review:	September 2026
Distribution:	Internal only
Version number	2.0

Statement to be signed by all personnel

I declare that I have received, read, understood and agree to abide by the Anti-Bribery Fraud and Corruption Policy.

I understand that this policy is an integral part of my employment contract and conditions of service with RedR Australia. I understand that any breach of this policy could result in disciplinary procedures, including formal warning, suspension from duties and/or summary dismissal from my role with RedR Australia.

Name: _____

Signature: _____

Date: _____