

# IOTDC-NT1

ABN: 64 647 630 779

1/3 Fisher Street, Maidstone VIC 3012

Ph: +61 487 936 984

## POLICY STATEMENT

IOTDC-NT1 is committed to ensuring compliance with ABC Obligations in the countries in which it operates. This means that IOTDC-NT1 is committed to conducting its business with honesty and integrity and to ensure high ethical standards are demonstrated in our actions and business relationships.

## POLICY PURPOSE

This ABC policy sets the minimum standards of conduct expected for the IOTDC-NT1 to ensure that it complies with its ABC Obligations.

Failure by the IOTDC-NT1 to comply with relevant ABC Obligations exposes the organisation to significant legal and regulatory action, reputational damage and financial loss (including serious criminal and civil penalties). In addition, IOTDC-NT1 People who are involved in or have facilitated Bribery and/or Corruption activities or failed to take reasonable steps to prevent and/or report those activities, could face personal criminal action, civil action and/or dismissal.

## POLICY

### 1. SCOPE

1.1. This policy applies:

- (a) to all IOTDC-NT1 People which is defined in this policy to include all employees, contractors, contingent workers, directors, office bearers, governance committee members and anyone else who represents IOTDC-NT1.
- (b) to all jurisdictions where IOTDC-NT1 operates

### 2. KEY PRINCIPLES AND STANDARDS

2.1. The following key principles and standards govern the IOTDC-NT1 's approach to meeting its ABC Obligations:

- (a) IOTDC-NT1 is committed to ensuring compliance with all applicable laws that relate to Anti-Bribery and Corruption in the jurisdiction in which it operates.
- (b) IOTDC-NT1 is committed to international best practice and does not tolerate any form of Bribery or Corruption, regardless of local customs or any different or typical business practices in countries where it has operations.
- (c) IOTDC-NT1 will forego business opportunities that breach or may breach ABC Obligations or the standards in this policy.
- (d) IOTDC-NT1 People are not permitted, either directly or indirectly, to give, offer, accept, promise, request or authorise a Bribe, or engage in or facilitate Corruption or corrupt practices.
- (e) IOTDC-NT1 People are prohibited from making or supporting Facilitation Payments made directly or on behalf of IOTDC-NT1.
- (f) IOTDC-NT1 People may not accept sponsored travel or accommodation without the prior approval of the Director, or in the case of the Director, the approval of the Operations Manager

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- (g) IOTDC-NT1 People are prohibited from offering or receiving gifts, hospitality or entertainment where these are unreasonable, excessive (whether in frequency and/or in value), disproportionate and not offered or accepted in good faith and without the expectation of receiving a commercial advantage. IOTDC-NT1 People will not accept any gift, hospitality or entertainment that exceeds the Monetary Limit without the prior approval of their people manager. IOTDC-NT1 People must also promptly declare any gifts, hospitality or entertainment which exceed the Monetary Limit by communicating this with the Director or in the case of the director, the Operations. If there is any doubt as to the Monetary Value, IOTDC-NT1 People should seek approval and declare any gifts, hospitality or entertainment.
- (h) IOTDC-NT1 People are prohibited from making political donations and contributions on behalf of the IOTDC-NT1 without the prior approval of the Director of the IOTDC-NT1. IOTDC-NT1 may engage in the political process, provided it is in a manner that is open, transparent and in accordance with its role as an advocate for public good. IOTDC-NT1 People may exercise their personal right to participate in the political process by making political donations, provided that such donations are made strictly in their private capacity.
- (i) IOTDC-NT1 People may only make charitable donations on behalf of the IOTDC-NT1 where they have received prior approval from the Director. IOTDC-NT1 People must take care to ensure that charitable donations are not used to disguise corrupt payments or Bribes. IOTDC-NT1 People who wish to make charitable donations on their own behalf must make clear that they are doing so in a private capacity.
- (j) IOTDC-NT1 requires that Third Parties that act on its behalf do not engage in, or facilitate, any conduct that breaches ABC Obligations. When conducting business with Third Parties, IOTDC-NT1 People must perform a reasonable risk-based due diligence assessment of Third Party ABC risk and must ensure that contracts with Third Parties are properly documented and contain appropriate clauses to manage Third Party ABC risk. Due diligence must be updated where there are changes in business relationships or other material changes. When engaging a Third Party, IOTDC-NT1 People must also comply with IOTDC-NT1's procurement policies and have regard to the conflict of interest requirements contained in the IOTDC-NT1 Code of Conduct.
- (k) IOTDC-NT1 requires that Third Parties that act on its behalf disclose the use of subcontractors or suppliers that may pose or appear to pose ABC risk. IOTDC-NT1 requires Third Parties that act on its behalf to maintain transparency of subcontractors and suppliers used to deliver products and services to IOTDC-NT1.
- (l) IOTDC-NT1 will maintain accurate records relating to its dealings with Third Parties (including due diligence records). No accounts may be kept "off the books" to facilitate or conceal improper payments.
- (m) The Operations Manager is appointed as the ABC Officer and is authorised to investigate and take action where Bribery or Corruption is identified and to report matters through appropriate internal and external channels. IOTDC-NT1 People must promptly report any suspected breaches of this policy or associated issues with the Director

### **3. COMMUNICATION, TRAINING AND IMPLEMENTATION**

- 3.1. IOTDC-NT1 People will receive training on this policy as part of their induction to IOTDC-NT1. Training sessions will also be provided when there is a material change to the policy.
- 3.2. The Director and Operations Manager are responsible for ensuring that the minimum standards contained in this policy are communicated to IOTDC-NT1 People and embedded operationally

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across the IOTDC-NT1 . Members of the Executive Team are responsible for implementing any additional policies, processes or guidelines that they consider appropriate to ensure the minimum standards in this policy are met given the nature and type of transactions undertaken by their division.

- 3.3. IOTDC-NT1 People are responsible for understanding and complying with the minimum standards in this policy. This includes:
  - (a) attending and participating in relevant training sessions;
  - (b) locating and reading policy communications that are issued;
  - (c) promptly reporting suspected or actual incidences of Bribery, Corruption or Facilitation Payments; and
  - (d) co-operating and assisting with any investigation.

## **4. CONSEQUENCE OF BREACH**

- 4.1. IOTDC-NT1 has zero tolerance for conduct in breach of this policy.
- 4.2. Failure to comply with the minimum standards set by this policy will be regarded as serious misconduct and may lead to disciplinary action up to and including dismissal, termination of employment or legal action. IOTDC-NT1 People must cooperate fully and openly with any investigation by IOTDC-NT1 in relation to alleged or suspected Bribery or Corruption. Failure to cooperate or to provide truthful information will be regarded as serious misconduct and may lead to disciplinary action, including dismissal or termination.

## **5. APPROVAL OF POLICY**

- 5.1. This ABC Policy and any material changes to it will be approved by the IOTDC-NT1 Director and formally adopted by the entire organisation. It will be reviewed at least annually.