



# Anti-Bribery, Fraud, Corruption and Money Laundering Policy

APM Human Services International Limited (ACN 639 621 766)

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## 1. What is this about?

This policy explains how **we** Advanced Personnel Management ('APM') and all APM group companies prevent fraud, corruption (including bribery) and money laundering.

Fraud, corruption and money laundering can harm our business, the communities we work in and the balance of commercial competition. All of these are criminal acts with potentially severe penalties for both you and APM.

## 2. Who is this for?

This policy is for you if you work for us as an employee (permanent, temporary or casual) or on contract in any of our divisions or business units and for everyone who does work directed by or connected with us (including contractors, subcontractors, agents, consultants and temporary staff) or if you supply us with goods or services.

## 3. What you need to know

**Fraud**, corruption and money laundering are illegal, unethical and extreme types of misconduct.

### Fraud

**Fraud** happens when people intentionally lie, steal or manipulate processes for financial or personal gain.

Fraud:

- is common
- is not necessarily committed by a particular type of person or someone who has a criminal history.
- may be committed by workers in the business
- can be complex, imaginative and changes based on opportunity or developments in technology or current events
- can happen using physical or electronic access
- may involve money, records, physical assets or inventory or a combination of these
- can be done by one person, a group of people or an organisation (including organised criminal groups).
- often results in losses for the business including direct losses from theft as well as losses in trust and reputation.

### False Claims

**False claims** are where an employee claims for work they have not done, or deliberately manipulates performance criteria or evidence to claim money from a customer or to avoid a penalty. It is a type of fraud.

Our contracts with our government customers globally often require us to submit evidence to verify that any amounts we charge them are legitimate and comply with audit requirements. Manipulation of evidence to cut corners or to justify a claim is a form of fraud **even if we have done the work or achieved the outcome**. We must never do this and must always take the time to ensure that all claims are valid and based on legitimate evidence.

## Corruption

**Corruption** is where someone misuses their position for personal gain, often involving bribery.

**Bribery** happens when someone tries to improperly influence a decision maker's behaviour to get a business or personal advantage.

Bribery and corruption often involve public officials, but it also applies equally to bribing employees of companies to gain an improper advantage.

Money, influence, information, decisions, employment or goods/services may be used for bribery and corruption.

Our business can be held accountable (legally and in other ways) for bribery and corruption activity by any of our businesses, team members, representatives, sub-contractors or anyone else acting for our business anywhere in the world and for failing to put in place reasonable measures to prevent bribery. Being involved in bribery and corruption would severely damage our business and our reputation. At its worst, being involved in bribery can lead to APM being prevented from tendering for government contracts and jail time for those involved.

## Donations, gifts, promotions and hospitality

Charitable or political donations, paying for hospitality or expenses, providing job opportunities for relatives, promotional activities and gifts can in certain circumstances be considered bribery and corruption. All of these should have specific authorisation criteria and should be reviewed carefully to make sure they are reasonable expenses in the context of our business.

## Facilitation payments

Facilitation payments are small payments to officials to do something they must do (such as issue a permit or allow bags through customs).

In the UK, and for UK nationals, facilitation payments are illegal bribes. In other countries such as the USA and Australia, there may be exceptions.

Only make facilitation payments if you or your family or another employee are in immediate danger. Make sure these payments are clearly recorded (do not try to hide the payment), including the reason why the payment was made. Tell the legal team for your area what happened as soon as possible.

## Money laundering

**Money laundering** happens when money associated with crime is moved, hidden, disguised or falsely recorded to seem legitimate and to hide its true history. Dealing with laundered money is a crime in some countries.

Money laundering is done in many creative ways. Detecting it can be difficult. Check money that has been moved for no obvious reason, transactions that are broken up into smaller amounts and other financial actions that seem unnecessary or unusual. If you suspect money laundering, do not use the money or pass it over to a third party. This can be considered as dealing with the proceeds of crime, which may be an offence.

## 4. What we do

We are an ethical business that does not take part in fraud, corruption and money laundering and we:

- have senior leaders who promote a culture where wrongdoing is not acceptable

- regularly review risks and develop effective controls
- carefully check people and businesses before agreeing to work with them (called due diligence) and incorporate anti-bribery and corruption clauses in our contracts with them
- make sure anyone who works with us (individuals or businesses) understands how to apply our standards
- communicate issues including training people to recognise and avoid wrongdoing
- ask outside experts to review and recommend improvements to our approach if needed.

We perform the following checks:

- payments are for the right amount and to the correct recipient
- records are accurate and have not been changed
- access to systems, money and assets/goods are authorised and only for valid business uses
- actions are approved and reasonable for the business
- transactions (including fees and charges) are legitimate and reasonable
- appropriate delegations and sign offs are in place for any payments made to third parties.

Review transactions and interactions and investigate anything that seems unusual or improper.

Use approved decision-making criteria and protect decision-making processes from improper influence.

Have transparent recruitment, tendering and bid processes that are applied equally to all applicants.

Make ethical behaviour a requirement of the way we act and do business.

Be appreciative when someone points out weaknesses in our system or reports incidents of wrongdoing. It means they want to protect the business.

## What you can do

We rely on you to help protect our business from harm.

We need you to:

- report known or suspected wrongdoing either to your manager or using our whistleblowing system
- follow our policies, guides, processes and other instructions and do not try to override system controls
- pay attention to information provided in training and other communications
- record accurate reasons and amounts for transactions
- report processes and systems that have weaknesses. Tell your manager or supervisor, the compliance or training team or submit an improvement suggestion
- when reviewing processes ask, 'How could this be misused?'
- have good relationships, do what is right and respect others. People are less likely to harm a business that treats them well
- think about your actions. If you feel the need to hide what you are doing from others, it may not be okay
- behave ethically and for the good of our business whenever you represent us.

## **5. Need more information**

We do not expect you to know everything about this topic or be able to resolve every situation. Some things require special knowledge and support to investigate and resolve.

If there is an issue that is outside the requirements and limits of your role or you are not sure what to do, speak to your leader, report the issue in an accepted way or ask for help from a specialist team within the business.

Email the Legal team at [Legal@apm.net.au](mailto:Legal@apm.net.au) to ask questions or give feedback about this policy.

## **6. How should business areas apply this policy**

Provide enough training, support and supervision for people to follow requirements.

Base guides and processes on this policy and check that people understand the global and local requirements.

Have effective measures and controls to manage the risks related to this topic for your area of the business.

Have clear misconduct reporting processes and act on reports of misconduct.

## **7. Document details**

Update this document whenever requirements change and review at least every 2 years.