

# Anti-Bribery and Anti-Corruption Policy

Version 1.2

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# 1. Purpose

The purpose of this policy is to establish controls to ensure compliance with all applicable antibribery and corruption regulations, and to ensure that the Mining and Automotive Skills Alliance (AUSMASA) business is conducted in a socially responsible manner.

#### 2. Overview

AUSMASA is committed to conducting all of our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption. We are committed to acting professionally, fairly and with integrity in all business dealings and relationships by implementing and enforcing effective systems to counter bribery.

#### 3. Audience

This policy applies to AUSMASA's:

- Board
- Committees and sub-committees
- Advisory Committees or Panels
- Chief Executive Officer (CEO)
- Employees
- Contractors and sub-contractors

# 4. Policy

AUSMASA will uphold all laws relevant to countering bribery and corruption in Australia.

# 4.1. Scope

#### **BRIBES**

Personnel must not engage in any form of bribery, either directly or indirectly.

# **GIFTS AND HOSPITALITY**

Personnel must not offer or give any gift or hospitality:

- that could be regarded as illegal or improper, or which violates the recipient's policies or
- to any public employee or government officials or representatives.

Personnel must not accept any gift or hospitality from any business associates with a value over \$50 unless previously authorised by your manager and recorded in the <u>Gifts, Hospitality and Benefits</u> Register.

#### **CHARITABLE CONTRIBUTIONS**

Charitable support and donations are acceptable (and indeed are encouraged), whether of knowledge, time, or direct financial contributions. However, personnel must be careful to ensure that charitable contributions are not used as a scheme to conceal bribery.

# 4.2. Personnel's responsibility

Personnel must ensure that they read, understand, and comply with this policy. All Personnel are responsible for the prevention, detection and reporting of bribery and other forms of corruption.

Personnel must avoid any activity that might lead to, or suggest, a breach of this policy.

Employees of AUSMASA who breach this policy will face disciplinary action, which could result in dismissal for gross misconduct. AUSMASA reserves its right to terminate its contractual relationship with agents or contractors of AUSMASA who breach this policy.

# 4.3. How to raise a query or concern

If any Personnel:

- have queries or concerns about what constitutes bribery or corruption or a breach of this
  policy
- are offered a bribe by a Third Party, or asked to make one to a Third Party, or believe that they are a target of such activity
- become aware of or witness prohibited activity involving other Personnel, or
- become aware of an event that may lead to a breach of this policy in the future,

the Personnel must notify their manager or their AUSMASA Contract Manager (as appropriate) as soon as possible.

#### 4.4. Protection

AUSMASA acknowledges that refusing to accept or offer a bribe, raising concerns about improper activity or reporting another's wrongdoing can cause concerns about possible repercussions. AUSMASA will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

AUSMASA is committed to ensuring that no one suffers any detriment or prejudicial treatment as a result of refusing to take part in bribery or corruption, or because they make a report in good faith about a suspected, actual or anticipated bribery or other corruption offence.

#### 4.5. Training and communication

AUSMASA will support this policy by delivering training to its personnel as required and relevant in relation to its activities.

AUSMASA's zero-tolerance approach to bribery and corruption must be communicated by Personnel to all suppliers, contractors, and business partners at the outset of our business relationship with them and as required.

# 4.6. Monitoring and Review

The effectiveness of this policy will be reviewed by AUSMASA's CEO no less than once per year to determine the effectiveness of AUSMASA's internal control systems and procedures in detecting and preventing bribery and corruption activity, to identify opportunities to improve their efficacy.

AUSMASA's Board of Directors must make all improvements and updates that are identified as soon as possible.

All Personnel are responsible for the success of this policy. AUSMASA invites Personnel to comment on this policy and suggest ways in which it might be improved. Comments, suggestions, and queries should be addressed to AUSMASA's CEO.

# 5. Definitions

A **BRIBE** is an inducement or reward offered, promised, or provided in order to gain any commercial, contractual, regulatory, or personal advantage.

Bribery includes (without limitation):

- Bribes
- Gifts and hospitality
- Charitable contributions.

**PERSONNEL** means each employee, officer, contractor, subcontractor, supplier, and agent of AUSMASA or all of them as a group, as the context requires.

**THIRD PARTY** means any individual or organisation that Personnel come into contact with during the course of working for or being engaged by AUSMASA and includes AUSMASA's actual and potential clients, business contacts, contractors, agents and government and public bodies.

# 6. Document History and Contact Details

#### Version

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Version	1.2
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Next Review date	20 June 2024

#### **Revision History**

Revision date	Summary of amendments	Prepared by	Version
January 2023	Amended Section 4.1, Gifts and Hospitality approver and noted Gifts, Hospitality and Benefits Register	Manager, Organisational Development	1.1
May 2023	Name and Branding update Audience amendment	Manager, Organisational Development	1.2

#### Contact details

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