

## Anti-Fraud and Anti-Corruption

1 Purpose	<p>This policy is designed to clearly articulate:</p> <ul style="list-style-type: none"><li>• IOH’s opposition to all forms of corruption and fraud;</li><li>• Measures taken to prevent fraud and corruption within the organisation;</li><li>• Processes for reporting suspicions or accusations of corruption or fraud by IOH staff, representatives or associates;</li></ul>
2 Statement	<p>IOH Injury &amp; Occupational Health (IOH) is strongly committed to principles of accountability and transparency to all stakeholders. Included in this commitment is “zero-tolerance” for all forms of corruption and fraud.</p> <p>Any person employed by or representing IOH or its associates must not directly or indirectly offer, solicit or accept payments, or give or receive personal rewards or inducements in exchange for making business decisions, nor accept gifts or entertainment where to do so might influence, or be perceived to influence, objective business judgement.</p>
3 References	<p>The Australian Criminal Code Act 1995</p>
4 Definitions	<p><u>Fraud</u> is dishonestly obtaining a benefit, or causing a loss, by deception or other means. This may include theft of funds from IOH, a partner or client. Of special consideration is the appropriate recommendation of work as not to over-service a client.</p> <p><u>Corruption</u> refers to “the misuse of entrusted power for private gain”. Commonly this includes bribery or blackmail through the withholding or providing of services in return for personal gain.</p>
5 Procedure	<p><b>Prevention</b></p> <p>IOH staff should take all appropriate efforts to prevent and avoid corruption or fraud, or the appearance of such, in their work. This includes prevention of the misuse of funds or other property of IOH, including intellectual property and stakeholder information protected under the <a href="#">Privacy Policy</a>.</p> <p>The opportunities for fraud are limited by the policies and procedures as outlined in the Financial Management Policy, and governance of the General Manager and Board of Directors.</p> <p>If a staff member suspects a contact of corrupt behaviour, they should immediately seek advice from the Executive Management Team on an</p>

appropriate course of action.

All new policies should be written with consideration of risks associated with the potential for financial wrongdoing or impropriety.

### **Reporting**

Any individual with suspicions of corruption or fraud by a member of IOH's staff, a representative or associate, should immediately raise their concerns with the General Manager or Director. Such contact shall be handled confidentially and the reporting party will be contacted immediately so that the concerns may be properly understood and contextualised. The reporting party shall not be identified to the accused staff member during or after the investigation without their consent, unless required by law.

### **Response to accusations of fraud**

The General Manager or Directors will investigate the truth of any accusation immediately, taking steps where appropriate to prevent future or ongoing fraud or corruption.

Where an IOH staff, representative or associate has been accused of fraud, IOH may take legal action to recover all losses, including legal fees. If appropriate a case may be referred to law enforcement agencies. Such action will be at the discretion of the Board of Directors.

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## 6 Operation

### **Gifts, Entertainment and Hospitality**

#### ***Acceptable Use and Limits***

An officer must be authorised prior to any expenditure on gifts, entertainment or hospitality on behalf of IOH, and must ensure:

- the expenditure is an acceptable use of IOH funds
  - Maximises IOH's commercial opportunities by strengthening links with existing and potential key customers and stakeholders
  - Supports and increases IOH's standing as a responsible corporate citizen in the wider general community
  - Recognises employees' contributions to the achievement of corporate goals and improves employee relations
- the level of expenditure is within reasonable limits

#### ***Disclosure***

The provision or receipt of gifts, entertainment and hospitality should be transparent and officers should provide information as to:

- i) the nature



- ii) the purpose
- iii) the expected outcomes for IOH

Appropriate documentation must be submitted to the finance department.