

1. Purpose

The purpose of this policy is to set out NCI's expectations in relation to Fraud, Bribery and Corruption, and to outline the reporting process and consequences of breaching this policy.

NCI is committed to supporting the development and transparency of professional relationships, but in doing so NCI must ensure that a high standard of business ethics and integrity is maintained.

2. Scope

This policy applies to all NCI employees in Australia, New Zealand, Fiji and Papua New Guinea.

3. Responsibility

3.1. Managers are responsible for:

- ensuring they have appropriate knowledge and understanding of the policy and procedures to manage compliance;
- ensuring they lead by example by complying with the policy and procedures;
- ensuring their teams comply with the policy and procedures;
- reporting any perceived and actual breach(es) immediately to the People and Culture representative; and
- seeking advice from People and Culture when required.

3.2. Employees are responsible for:

- ensuring they have knowledge and understanding of this policy and any procedures;
- abiding and upholding these behaviours;
- reporting any perceived and actual breach(es) immediately to your People and Culture representative; and
- seeking advice from their Team Leader, Manager, or People and Culture team if they have questions about this policy.

4. Policy

4.1 Definitions

Fraud, bribery and corruption include the misappropriation of assets, secret commissions, the manipulation of reporting and the abuse of positions, of power and money laundering.

For the purposes of this policy:

- Fraud is a dishonest and intentional activity committed to secure an unfair or unlawful gain, regardless of whether or not deception is used.
- Bribery and corruption include activities which could be considered dishonest or fraudulent with the intent to encourage personal gain ahead of the interests of the business.
- Supplier and business partner include any existing or potential supplier of goods or services to NCI and includes contractors and third-party labour providers.

Examples include:

- Bribes, secret commissions or other improper payments or benefits;
- The deliberate falsification, concealment, destruction or use of falsified documentation;
- The improper use of information or position;
- Theft of cash;
- Accounting fraud (for example, false invoicing);
- Giving or taking bribes or secret commissions or improperly accepting gifts;
- Using NCI's intellectual property, information or resources (including computers and company phones) for personal gain;
- Theft or misuse of NCI's assets, equipment or facilities;
- Deliberate use of NCI's credit card for personal expenses;
- Not disclosing conflicts of interest; or
- Improper conduct in procurement and/or contract management processes.

4.2 Fraud, Bribery and Corruption

It is expected that employees do not engage in fraud, bribery or other persuasion tactics that attempt to influence behaviour to benefit NCI, nor for the benefit of a third party (which includes family and friends).

Employees may engage with governments, regulators, and non-governmental organisations across the world during their regular duties. Employees are expected to behave in accordance with NCI's Gift Acceptance Policy when receiving/giving gifts or entertainment, to and from any governmental employee or public official.

Organisations who engage with NCI in a professional capacity (including third parties) should never attempt to offer a bribe, payment or inappropriate gift to employees or anyone engaged on behalf of NCI.

4.3 Reporting

Individuals who become aware of potential fraudulent and/or corrupt behaviours should report these inappropriate behaviours as soon as possible to their manager and/or People and Culture. These matters are taken seriously by NCI and will be appropriately investigated.

If an employee does not feel able to use the existing reporting channels due to the nature and/or seriousness of the inappropriate behaviour, then please refer NCI's Whistleblower Policy for further information on the reporting process.

5. Compliance

Compliance with this policy is mandatory. Employees dealing with suppliers and business partners, are to emphasize and reinforce these requirements as a condition of our continued sustainable relationship with them.

Any breach of this policy by an employee will result in disciplinary action, may lead to their termination and may have serious consequences for the supplier or business partner concerned. Where appropriate, these matters may be reported to relevant local or international authorities.

6. Policy Owner, Administration and Approval


Changes and amendments to this policy will be the responsibility of the People and Culture team and approved by the Managing Director / CEO.

The People and Culture team has overall responsibility for implementation of the policy with the operational responsibility delegated to Managers.

7. Time Period for Which the Policy Applies

This policy will be reviewed 2 years after its approval subject to any event that necessitates an earlier review.

8. History

Version	Date	Author	Change Description	Approval Status	Signature (final versions only)
1.0	9 Oct 2023	D. Veselinovski	New policy	Draft	N/A
1.1	14 Nov 2023	P&C Team ANZ	Minor change, word "deliberate" added	Final version post consultation	 Frauke Tyrrell MD / CEO