

## FRAUD POLICY

---

### **Purpose**

The purpose and objective of this policy is to:

- provide high level guidance for the prevention and detection of fraud, and the Company's response to fraud;
- identify who is responsible for taking action in cases of actual or suspected fraud; and
- set out the Company's reporting and investigation procedures in relation to fraud.

### **Response to fraud**

The Company has a zero tolerance approach to fraud. All instances of suspected fraud or corruption must be reported and investigated as set out in this policy.

Any proven incidents of fraud will be considered to be serious misconduct, and may be reported to the appropriate authorities.

### **Scope of Policy**

This policy applies to any fraud, or suspected fraud, involving directors, employees, shareholders, consultants, vendors, contractors, outside agencies doing business with the Company, and/or any other parties with an actual or potential business relationship with the Company.

### **What is Fraud?**

Fraud means a dishonest act or omission committed in order to obtain or potentially obtain an unfair, unjustified or unlawful gain for any person. Fraud can include, but is not limited to:

- Knowingly providing false, incomplete or misleading information to the Company for unfair, unjustified or unlawful gain.
- Theft of cash or property (including intellectual property).
- Forgery or alteration of documentation, computer files, or data, intentional misrepresentation of financial or personal information, and failing to update records or documentation to maintain their accuracy.
- Misappropriation of funds, securities, supplies, or other property.
- Impropriety in the handling or reporting of money or financial transactions.
- Misuse of insider knowledge of Company activities.
- Disclosing confidential and proprietary information to outside parties.
- Disclosing to other persons share trading activities engaged in or contemplated by the Company.
- Accepting or seeking anything of material value from contractors, vendors or persons providing services/materials to the Company otherwise than in accordance with the 'Giving or receiving of gifts' section of the Code of Conduct and Ethics.
- Destruction, removal or inappropriate use of records, furniture, fixtures, and equipment; and/or
- Any similar or related dishonest conduct.

Other examples of immoral or unethical behaviour or dishonest conduct are set out in the Company's Code of Conduct and Ethics and should

also be reported using the appropriate reporting channels (see “**Reporting Procedures**”).

## **Responsibility**

All members of the management team are responsible for facilitating the detection and prevention of fraud.

Each member of management will ensure they are:

- familiar with the types of fraud that might occur within their area of responsibility;
- alive to the risks and indications of fraud; and
- familiar with the procedures to follow if fraud is suspected or detected.

Everyone within the Company is responsible for maintaining the highest level of ethical behaviour and must report any actual or suspected fraud using the appropriate reporting channels (see “**Reporting Procedures**” below).

## **Reporting Procedures**

Employees are not to take steps to investigate actual or suspected fraud themselves (unless they are the individuals identified as having that responsibility in this policy). Anyone who is aware or who suspects fraud must promptly report such activity to any of the following:

- General Counsel
- Chief Financial Officer
- Chairperson of the Audit and Risk Committee, or
- via the Whistleblower toll-free number (FairCall - 0800 100 526) or email address (faircall@kpmg.com.au).

Reports relating to the General Counsel or the Chief Financial Officer should be referred to the Chief Executive Officer and the Chairperson of the Audit and Risk Committee.

All reports of suspected or actual fraud must be treated seriously and with great care, and forwarded to the General Counsel for investigation (see “**Investigations**” below). If the General Counsel is the subject of the report, the Chief Executive Officer will appoint an appropriate person to conduct the investigation.

The person who reports actual or suspected fraud may remain anonymous, and can be protected by the Protected Disclosures Act 2000.

All reported and investigated allegations are to be reported to the Audit and Risk Committee as described further below.

## **Investigations**

The General Counsel has the primary responsibility for the investigation of all actual or suspected fraud (unless, as noted above, the General Counsel is potentially implicated).

The General Counsel will maintain a record of all reports of actual or suspected fraud, including a summary of the process and outcome of each fraud investigation.

Depending on the nature and seriousness of the actual or suspected fraud, an investigation may require consultation or engagement with other persons, such as technical experts or forensic accountants, auditors, and external agencies.

Any data, record, or property belonging to the Company may be examined as part of any investigation process, in a manner that is consistent with the Privacy Act 2020.

Employees must cooperate with and not impede any investigation of actual or suspected fraud.

Any investigations will be conducted without regard to the relevant individuals' length of service, position/title, or relationship to the Company.

In the event that fraud is substantiated, every effort must be made to preserve and protect all relevant evidence that may be required to support internal disciplinary action and, where appropriate, criminal prosecution. The General Counsel will report substantiated reports to the Board of Directors through the Audit and Risk Committee.

The decision whether to report actual or suspected fraud to the appropriate law enforcement and/or regulatory agencies will be made by the General Counsel and the Chief Executive Officer. If one or both of those individuals is implicated, the decision will be made by the Chairperson of the Audit and Risk Committee.

## **Confidentiality**

All information collected or received through a report or during an investigation into fraud must be treated in confidence, except as necessary for the thorough investigation and resolution of the complaint, to meet the requirements of natural justice or by law.

The existence, contents, and results of reports or investigations will not be disclosed or discussed with anyone other than those who have a legitimate need to know.

## **Amendments**

The Company reviews its policies from time to time to ensure compliance with applicable law and conformity with industry practice. Therefore, this policy may be amended, modified or waived at the discretion of the Company in accordance with applicable law and regulation.

**Updated April 2022**