

Fraud and Corruption Prevention Policy

October 2024

Purpose

As a Government Owned Corporation, CleanCo has an obligation to observe the highest ethical standards and act in the interest of our stakeholders. Without this, our reputation could be compromised, and we could lose public trust and confidence. The purpose of this policy is to support high standards of professional conduct and honest and ethical business practices within CleanCo. This policy:

- sets out the responsibilities of CleanCo Staff in preventing and detecting fraud and corruption, and the actions to be taken when fraud and corruption is suspected; and
- ensures that the Board and Management promote a culture of disclosure and protection of the disclosers

Scope

This policy applies to all persons working for or on behalf of CleanCo. This includes employees, directors, officers, consultants, contractors and any other third-party representatives (**CleanCo Staff, you or your**).

Policy Statement

CleanCo is committed to:

- creating and supporting a workplace culture that promotes fair and ethical standards;
- complying with Anti-Corruption Legislation; and
- preventing, identifying and addressing all acts of corruption, and of fraud against CleanCo.

CleanCo Staff must comply with this policy and the Fraud and Corruption Prevention Procedure, in accordance with the Responsibilities detailed below.

Responsibilities

ROLE	KEY RESPONSIBILITIES
Board	Accountable for ensuring an appropriate framework exists governing the prevention of fraud and corruption.
Chief Executive Officer (CEO)	• Ensuring this policy is in place, employee training and awareness initiatives. • Implementing control systems to prevent, detect and effectively manage incidents of fraud and corruption. • Promoting and communicating, within CleanCo and externally, CleanCo's high standards of professional conduct. • Promoting honest and ethical business practices.

	• Encouraging the reporting of suspected wrongdoing. • Notifying actual or suspected Corrupt Conduct to the CCC (as advised by the Company Secretary, see below). • Ensuring appropriate action is taken for proven incidents of fraud and corruption.
General Manager Legal & Governance and Company Secretary	• Promoting and communicating the requirements of this policy. • Encouraging the reporting of suspected wrongdoing. • Managing incidents of fraud and corruption which may constitute suspected Corrupt Conduct or a Public Interest Disclosure in accordance with policy and regulatory requirements. • Working with the Chief Financial Officer to ensure that fraud risk management is integrated into risk management processes. • Employee training and awareness initiatives. • Implementing control systems to prevent, detect and effectively manage incidents. • Ensuring appropriate action is taken for proven incidents of fraud or corruption. • Maintaining official records and reporting suspected wrongdoing to appropriate authorities.
Company Secretary	• Managing Corrupt Conduct, including: ○ attending CCC briefings and information sessions and acting as a contact officer for the CCC; ○ assisting the CEO to form a view whether Corrupt Conduct could be reasonably suspected; ○ liaising with the CCC in relation to notifications of Corrupt Conduct; ○ maintaining official files and records reporting suspected Corrupt Conduct to the CCC; and ○ periodic review of this policy in consultation with the CEO.
Internal Audit	• Assessing the adequacy of internal controls within service areas as part of routine auditing activity. • Making recommendations to improve the effectiveness of key controls. • Providing advice to service areas in relation to preventing and detecting fraud and corruption.
CleanCo Staff	• Complying with this policy and related procedures in the performance of your Official Duties.

References

This policy is to be read with:

- Code of Conduct
- Gifts and Benefits Policy
- Conflict of Interest Policy
- Whistleblower and Public Interest Disclosure and Protection Policy
- Fraud and Corruption Prevention Procedure.

The following legislation is applicable to this policy:

- *Crime and Corruption Act 2001* (Qld)
- *Criminal Code Act 1899* (Qld)
- *Government Owned Corporations Act 1993* (Qld)
- *Corporations Act 2001* (Cth).

Definitions

The following definitions apply to this policy:

Anti-Corruption Legislation	Applicable State and federal Criminal Codes, the <i>Corporations Act 2001</i> (Cth) and the <i>Crime and Corruption Act 2001</i> (Qld), can include other legislation in other jurisdictions where CleanCo conducts business such as the <i>Foreign Corrupt Practices Act 1977</i> (USA) and the <i>Bribery Act 2010</i> (UK)
Board	The Board of Directors of CleanCo
CCC	The Crime and Corruption Commission Queensland
CEO	The Chief Executive Officer
CleanCo	CleanCo Queensland Limited ACN 628 008 159
CleanCo Staff (you, your)	All CleanCo employees, directors, officers, consultants, contractors and any other third-party representatives
GOC	Government Owned Corporation
Official Duties	Refers to the day-to-day activities performed by CleanCo Staff as part of their role accountabilities

Document governance

Title:	Fraud and Corruption Prevention Policy
Approved by:	CleanCo Queensland Limited Board
Periodicity of review:	2 years
Approved:	October 2024

Version control

Version	Date	Description	Approved By
1	June 2019	Initial document	Board
2	April 2020	Change in assignment of responsibilities	Board
3	April 2021	Inclusion of details for confidential reporting and removal of unnecessary provisions	Board
4	November 2022	Minor procedural amendments following biennial review	Board
5	October 2024	Updated and merged with Anti-bribery and Corruption Policy; Procedural material moved to Fraud and Corruption Prevention Procedure	Board