

What do we need to do?

The following 11 principles are elaborated in the Group Fraud and Corruption policy. We:

1. have zero tolerance for fraud and corruption
2. do not make, and will not accept, facilitation payments or “kickbacks”
3. require employees to not engage in conduct that may be seen or deemed as fraudulent, unconscionable, dishonest or corrupt; designed to create or maintain artificial prices, or entering or engaging in fictitious transactions
4. are committed to deterring, preventing, detecting, and responding to fraudulent or corrupt behaviour
5. require that all employees act honestly and with integrity, in line with Behavioural Guidelines and Delegations of Authority
6. have Behavioural Guidelines which help to prevent fraud and corruption and require employees to endorse their compliance annually
7. ensure all alleged incidents whether they be against AP or by AP staff members or representatives against another person (consumer) or organisation/s will be confidentially investigated
8. will securely manage credit and payment card data wherever used
9. will maintain appropriate security controls to protect e-commerce information being stored or transmitted by electronic means
10. will require fraud risk assessments be completed for all major business initiatives, projects, business as usual activities or significant change, and
11. will identify requirements to meet legal, statutory, regulatory, risk management or contractual obligations with regard to fraud and corruption management, and monitor compliance of those requirements.

Our goal

We must all act in an ethical and lawful behaviour in all business practices and in a manner consistent with community and corporate standards and report suspected or witnessed instances of fraud or corrupt conduct.

Did you see something that was fraudulent?

Any person covered by the policy who suspects fraudulent or corrupt activity can report the matter through a range of options. These are detailed further in the policy.

What do you need to do?

You must not behave in a corrupt or fraudulent manner. If you do, there may be consequences.

There are consequences for fraud.

We will follow a formal consequence management process for those who commit a fraudulent or corrupt act.

Consequences for breaching this policy will be as appropriate, and may include termination and/or possible criminal and/or civil charges.

