Anti-Bribery, Fraud and Corruption Policy

Contents

1. Introduction

ABV Limited (ABV) is committed to conducting business in an ethical and transparent manner, and we have a zero-tolerance approach towards bribery, fraud and corruption. This Anti-Bribery, Fraud and Corruption Policy outlines ABV's commitment to prevent bribery, fraud and corruption and provides guidance to all key stakeholders on their responsibilities in this regard.

2. Purpose

The purpose of this policy is to prevent, detect, and respond to bribery**,** fraud and corruption by establishing clear standards of conduct and ensuring compliance with applicable laws and ethical business practices.

3. Scope

This policy applies to all but not limited to all ABV personnel, including employees, directors, volunteers, interns, contractors, consultants, and representatives of ABV ('Applicable Persons').

4. Definitions

Bribery means the (actual or attempted) offering, promising, giving, accepting, or soliciting of a benefit or advantage (financial or otherwise) as an inducement or reward for an individual or entity to act improperly or to secure an improper advantage. Acts of bribery are designed to influence individuals to act dishonestly in the performance or discharge of their duty (irrespective of whether the individuals are ultimately influenced or not). This includes the offering or acceptance of any kickback, loan, fee, reward, benefit, or other advantage intended to secure an improper benefit, exert undue influence, or facilitate or participate in a dishonest, unethical, or unlawful arrangement.

Corruption means the abuse of entrusted power for private gain, which includes bribery and other forms of unethical or unlawful conduct. Examples of corruption include, but are not limited to:

(i) Engaging in bribery, extortion, or blackmail, including the offering, demanding, or acceptance of money, gifts, or other benefits to influence decisions or obtain an improper advantage.
(ii) Allowing personal, financial, or other interests to improperly influence, conflict with, or override the interests of ABV.
(iii) Offering, giving, soliciting, or accepting gifts, hospitality, or other benefits with the intention or effect of securing preferential treatment, influencing a business decision, or creating a sense of obligation.
(iv) The unauthorised or improper disclosure of confidential, sensitive, or proprietary information to external parties, regardless of whether any personal benefit is obtained.
(v) Engaging in collusive or deceptive practices, including but not limited to submitting or accepting false quotes, generating false or misleading invoices, participating in price fixing or bid rigging, or otherwise manipulating procurement or commercial processes.
(vi) Nepotism, including the improper favouring of relatives, friends, or associates in recruitment, contracting, procurement, or other business decisions, without regard to merit, conflicts or fairness.

Fraud means dishonestly obtaining a benefit, or causing a loss, by deception or other means. This includes benefits obtained that can be both tangible and intangible and encompasses activities or behaviours broader than the misuse or misappropriation of funds or assets. A benefit may also be obtained by a third party rather than, or in addition to, the perpetrator of the fraud. Examples of fraud include, but are not limited to:

(i) Theft such as stealing property, petty cash, gift cards, donations or corporate assets.
(ii) Misappropriation, misuse or theft of program funds or assets.
(iii) Misuse of ABV credit cards, property, equipment, services, assets or facilities.
(iv) Making, or using, false, forged or falsified accounts, documents, records or signatures.
(v) Providing false information or failing to provide information when there is an obligation to do so.

5. Policy

5.1 Prohibited Activity

ABV strictly prohibits all Applicable Persons from engaging in any form of bribery, corruption, fraudulent activities or conduct, whether direct or indirect, in any business activity or relationship. This includes but is not limited to:

(i) Offering, promising, giving, or accepting bribes, kickbacks, or improper payments, in cash or any other form, to anyone, including domestic or foreign government officials, customers, suppliers, or any other third party, to influence or obtain improper business advantages.
(ii) Making or receiving facilitation payments, which are small payments made to expedite routine actions or processes that are otherwise part of an official's duties.
(iii) Engaging in fraudulent and/or corrupt behaviour by creating or using slush funds, off-books accounts, or any other form of undisclosed or unrecorded payments or transactions.
(iv) Using third parties, such as agents, intermediaries, or consultants, to facilitate or conceal bribery, fraud or corruption.
(v) Conspiracy, aiding and abetting or complicity in bribery, fraud or corruption.
(vi) Engaging in any other conduct that may violate anti-bribery, fraud and corruption laws or the principles of fairness, integrity, and transparency.
(vii) Engaging in the bribery of a public official (in Australia or overseas) which is a serious criminal offence and carries heavy penalties.

5.2. Responsibilities

Executive

(i) The senior Executives of ABV are responsible for setting the tone at the top and promoting a culture of integrity and compliance.
(ii) Working with the Policy and Compliance Officer, they are accountable for ensuring that all Applicable Persons are aware of and comply with this policy.

Employees, Volunteers and Consultants/Contractors

(i) All employees, directors, volunteers and consultants/contractors are expected to understand and comply with this policy.
(ii) They must avoid engaging in any conduct that may be perceived as bribery, fraud or corruption.
(iii) They must avoid situations where they could be influenced, or could be perceived to be influenced, by a personal interest in carrying out otherwise legitimate transactions on behalf of ABV.
(iv) They must disclose and appropriately manage any actual, potential or perceived conflict of interest in accordance with ABV's Conflict of Interest Policy.
(v) They must ensure that all transactions, expenses, and approvals are accurately recorded, supported by appropriate documentation, and comply with ABV financial controls and processes.
(vi) They must not offer or accept gifts, hospitality, or benefits that could improperly influence, or be perceived to influence, a decision relating to ABV.
(vii) They must exercise due care when engaging or working with third parties (e.g. suppliers, partners) and must not knowingly engage parties involved in unethical or unlawful conduct.
(viii) They must promptly report any suspected or actual instances of bribery, fraud, or corruption, including concerns, suspicions, or offers of improper benefits, even if no wrongdoing has occurred in accordance with this policy.
(ix) They must fully cooperate with any internal or external investigations, audits, or reviews relating to suspected misconduct.
(x) They must complete any required training relating to anti-bribery, fraud, and corruption and remain informed about their obligations under this policy.

Partners

ABV will conduct due diligence on partners before engaging in any business relationship, and where appropriate and proportionate, will include anti-bribery fraud and corruption clauses in in Memorandums of Understanding (MoUs), funding agreements and other partner arrangements.

5.3 Risk Assessment and Register

Bribery, fraud and corruption risks will be included as standard items on ABV's Operational Risk Register and will be regularly monitored, reviewed and reported to the Board.

5.4 Gifts and hospitality

(i) ABV recognises that gifts, hospitality, and entertainment can form part of normal business relationships, but must not be used to improperly influence decisions or obtain business advantages.

(ii) ABV operates in a range of jurisdictions and cultural contexts. While ABV respects local customs, traditions and cultural practices, all Applicable Persons must comply with applicable local laws, as well as this policy and relevant Australian laws. Custom, practice or local expectations are not a justification for engaging in bribery, corruption, fraud or any other conduct prohibited by this policy. Where there is any inconsistency, the higher standard of conduct must be followed.

(iii) This policy permits reasonable and legitimate hospitality or business expenditure. Gifts may only be given or received where all of the following conditions are met:
  a. they are not intended to influence a decision or secure an improper advantage;
  b. they are customary, appropriate, and proportionate to the circumstances (including cultural or ceremonial contexts);
  c. their type, value, and timing are reasonable and consistent with normal business practice;
  d. they comply with this policy;
  e. they do not give rise to any real or perceived conflict of interest; and
  f. they are provided openly and transparently.

(iv) Examples of acceptable items may include:
  a. modest meals or refreshments in the course of ABV programs.
  b. low-value promotional items (e.g. pens, notebooks, branded merchandise).
  c. customary, ceremonial or culturally significant gifts given as a gesture of appreciation, respect or recognition, particularly in communities where the giving and receiving of such gifts forms part of local custom or protocol, provided the gift is not intended to improperly influence a decision or create an obligation. Examples may include locally made handicrafts, bilum bags, woven hats, traditional necklaces, artwork or similar cultural items.
  d. attendance at ordinary business networking events.

(v) Examples of unacceptable items may include:
  a. cash or cash equivalents (e.g. money, vouchers or gift cards).
  b. expensive or luxury goods that could reasonably be perceived as creating a sense of obligation.
  c. travel, accommodation or entertainment not directly related to a legitimate business purpose.
  d. gifts, benefits or hospitality offered during procurement, tender, recruitment, grant assessment, funding or other decision-making processes where acceptance could create an actual, potential or perceived conflict of interest.
  e. any gift or benefit given with the intention, or appearance of intending, to improperly influence a decision.

(vi) Any gift or benefit valued over AUD$100 must be notified to the Senior Program Manager (for volunteers, contractors, employees, engaged on program delivery) or the Policy and Compliance Officer (in all other circumstances) before being given or accepted. Disclosure should occur before acceptance where practicable, or as soon as reasonably possible afterwards where prior disclosure is not practical or would be culturally inappropriate.

(vii) The Senior Program Manager or Policy and Compliance Officer, as applicable, must assess whether the gift or benefit presents an actual, potential or perceived conflict of interest and determine whether any further action is required and complete the Gifts and Benefits Receipt Register in Attachment A.

(viii) Expenses must be accurate, supported by receipts, and for legitimate business purposes. False claims or using expenses to conceal bribes or improper payments is strictly prohibited.

5.5 Record Keeping

(i) ABV will keep financial records and have appropriate internal controls in place which will evidence the business reasons for making payments to third parties. Applicable Persons must ensure all expense claims relating to hospitality, gifts or expenses incurred to third parties are submitted in accordance with ABV's financial controls and procedures and specifically record the reason for the expenditure.

(ii) All accounts, invoices, memoranda and other documents and records relating to dealings with third parties, such as partners, suppliers or contractors, should be prepared and maintained with strict accuracy and completeness.

5.6 Investigation and Reporting

(i) All Applicable Persons are required to report any observed or suspected incidents of bribery, fraud or corruption in accordance with this policy.

(ii) Reports of observed or suspected incidents of bribery, fraud or corruption must be reported immediately (within 24 hours) to the CEO or CFO (the person making the report should ensure that they receive an acknowledgement of receipt from the CEO or CFO). Reports may also be reported in accordance with ABV's Reporting Wrongful Disclosures or Complaints Management Policies or through the following channels:

a. Directly to the reporter's main contact within ABV.
b. Directly to the reporter's Line Manager.
c. Directly to ABV's management team either verbally or in writing.
d. Directly to an ABV Board member in writing (a request can be made to ABV's CEO for the appropriate contact details).

(iii) If a person receives a report in accordance with 5.6(ii)(a-d) above, they must ensure that the CEO and CFO are informed immediately (if not already). If it is considered to be a conflict of interest to notify the CEO and/or the CFO, the Chair of the Board should be notified immediately.

(iv) Reports should include the nature of the incident, involved parties, and any relevant details.

(v) The CEO/CFO should report suspicious activity to the Australian Federal Police.

(vi) If the matter involves an ABV staff member, the CEO is to follow the guidance of the Australian Federal Police in relation to internal investigation and human resource matters.

5.7 Breach of Policy/Retaliation

(i) Violations of this policy will be met with disciplinary measures appropriate to the severity of the breach, which may include termination of employment or contractual relationships.

(ii) ABV prohibits any form of retaliation against individuals who report violations or participate in investigations. Retaliatory actions will be addressed with appropriate disciplinary measures.

(iii) Disciplinary actions will be based on the severity of the policy breach and may range from warnings to termination of employment or contract.

5.8 Confidentiality

As far as is reasonably practicable, information regarding allegations and the identity of those providing the information will be kept confidential and shared only with those directly involved in the investigation process including the Australian Federal Police and other external regulators.

6. Related Documents

Anti-Money Laundering and Counter Terrorism Policy
ABV Wrongful Disclosures Policy
ABV Complaints Management Process
ABV Conflict of Interests Policy

7. Document Information

Policy Owner:	CEO
Policy Authority:	Board
Policy Implementer:	Policy and Compliance Coordinator
Original approval:	14 August 2026
Last Reviewed:	14 August 2026
Last Policy Change:	14 August 2026
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Attachment A: ABV Gifts and Benefits Register

ABV Gifts and Benefits Receipt Register

This register records gifts, benefits and hospitality with an estimated value greater than AUD $100 that are offered to or received by ABV personnel (including volunteers, contractors and consultants). Information contained in this register is confidential and may only be accessed or used for legitimate ABV governance, compliance, audit, risk management and investigation purposes.

Date Received	Recipient	Position	Offered By	Organisation/Individual	Description of Gift/Benefit	Estimated Value ($)	Accepted/Declined	Reason for Acceptance (if accepted)	Conflict of Interest Identified?	Approval Required?	Approved By	Action Taken (Retained, Shared, Returned, Donated)