

# Fraud and Corruption Prevention Policy

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## Purpose of Policy

TasWater is committed to the highest standard of conduct and ethical behaviour and has zero tolerance for fraud, corruption or bribery occurring within, by or being perpetrated against TasWater. Fraud, corruption, and bribery are incompatible with our values and present a risk to the achievement of our objectives and the effective provision of our services to our customers and community.

The purpose of this policy is to:

- Support the highest standard of conduct and ethical behaviour within TasWater
- Minimise the risk of fraud, corruption or bribery occurring within and being perpetrated against TasWater
- Set out the responsibilities of our people in relation to preventing fraud, corruption, and bribery
- Establish the framework for identification of fraud, corruption and bribery risk exposures and establishment of procedures for prevention, detection, and response.

## Scope

This policy applies to all our people: Board Members, People Leaders, Team Members, and contractors working for TasWater or at TasWater sites.

**People Leader** – refers to a TasWater employee that leads one or more employees or contractors.

**Team member** – refers to a TasWater employee.

Contractors can contact their TasWater People Leader or site contact if they have any questions in relation to this Policy.

## Policy Statement

TasWater has zero tolerance for fraud, corruption, or bribery in any of its activities.

TasWater is committed to:

- Providing a sound ethical environment in which honesty and integrity are encouraged
- Implementing prevention strategies and controls to minimise the opportunity for fraud, corruption, or bribery
- Implementing detection strategies to identify and investigate incidents of fraud, corruption, and bribery
- Proactively managing any allegations or incidents of fraud, corruption, and bribery in accordance with approved procedures and liaising with the relevant authorities

- Ensuring awareness of this policy and related documents by training Team Members and making this policy available publicly through its website. [www.taswater.com.au](http://www.taswater.com.au)
- Recording TasWater's approach in a comprehensive Fraud and Corruption Prevention Plan, risk assessment and associated documents.

Everyone in TasWater has a role to play in identifying potential fraud, corruption or bribery and initiating appropriate response. TasWater expects all our people to assist in preventing fraud, corruption, or bribery by:

- familiarising themselves with, and adhering to, TasWater's policies, procedures, and programs to manage the risk of fraud, corruption, or bribery
- understanding what behaviour constitutes fraud, corruption, or bribery
- being continuously vigilant to the potential for fraud, corruption, or bribery to occur and
- reporting suspected or actual occurrences of fraud or corruption or bribery within or perpetrated against TasWater to the following persons:

**TasWater's confidential Whistleblower Hotline**

Phone: 1800 758 004

Scan the QR Code:



Email: [TasWaterspeakup@coreintegrity.com.au](mailto:TasWaterspeakup@coreintegrity.com.au)

Website: <https://speakup.coreintegrity.com.au/taswater>

Post: Core Integrity  
PO Box 730  
Milsons Point NSW 1565

Or

**General Counsel/Company Secretary**

Kate Crawford  
Phone: 0437 559 278

Or

**Deputy General Counsel**

Stephanie Collins  
Phone: 0457 065 013

## Responsibilities

### CEO

The CEO is responsible for ensuring that an enterprise-wide Fraud and Corruption Prevention Plan is in place, modelling the highest standards of ethical behaviour and ensuring compliance with all relevant legal obligations.

### General Counsel and Company Secretary

The General Counsel and Company Secretary is the owner of this policy and responsible for coordinating and documenting TasWater's Fraud and Corruption Prevention Plan and risk assessment.

### Our People

Our people are expected to comply with this Policy, including raising concerns relating to fraud, bribery, and corruption.

## Definitions

**Bribe/bribery:** is offering, promising, giving, accepting or soliciting of an undue advantage of any value (e.g. a financial benefit), directly or indirectly (e.g. through a third person) in violation of applicable law, as an inducement or reward for a person acting or refraining from acting in relation to the performance of that person's duties.

Examples: offering discounted membership to a club in exchange for approval of commercial contract, providing financial benefits to family members in exchange for work orders, or offering money or goods in exchange for silence.

**Fraud:** is dishonest activity causing actual or potential gain or loss to any person or TasWater including theft of moneys or other property by persons internal and/or external to TasWater and/or where deception is used at the time, immediately before or immediately following the activity.

Examples: creating fake invoices to be paid into your account, approving spend on behalf of your manager when you do not have the delegation, or taking equipment or resources of TasWater for personal use.

**Corruption:** is dishonest activity in which a person associated with TasWater acts contrary to the interests of the organisation and abuses their position of trust in order to achieve personal advantage or advantage for another person or organisation. This can also involve corrupt conduct by the organisation, or a person purporting to act on behalf of and in the interests of the organisation, in order to secure some form of improper advantage for the organisation either directly or indirectly.

Examples: TasWater personnel misusing confidential information gained through their position at TasWater to gain advantage in a personal financial investment, such as using a contractor they have a financial interest in, or not charging a personal contact for services.

## Failure to Comply

If TasWater personnel fail to comply with this Policy disciplinary action may be taken.

## Related Documents

- TASCDS03 Code of Conduct
- TASMNP04 Fraud & Corruption Prevention Plan
- TASPOL43 Gifts and Benefits Standard
- TASPOL25 Conflicts of Interest Standard
- TASPOL26 Whistleblower Policy
- TASFRA04 Risk Management Framework
- TASFRA03 Compliance Management Framework
- TASFRAXX Assurance Framework
- *Criminal Code Act 1995 (Cth)*
- *Criminal Code Act 1924 (Tas)*
- *Integrity Commission Act 2009 (Tas)*
- *Public Interest Disclosure Act 2003 (Tas)*
- Australian Standard AS8001:2018 – Fraud and Corruption Control.

<b>Title</b>	Fraud and Corruption Prevention Policy
<b>Approved by</b>	Board
<b>Date</b>	28/2/2024