



Anti-Corruption and Fraud Prevention Policy

Policy Reference: COR-PEO-POL0002

1. Purpose

RJV is committed to maintaining a high standard of integrity and operating fairly, honestly, and legally to comply with regulations regarding anti-corruption, bribery, and fraud. We are committed to maintaining a culture of corporate compliance and ethical behaviour while ensuring an open and transparent management approach to avoid exposure to potential conflicts of interest.

RJV is committed to maintaining a high standard of ethical conduct in all business dealings. The company does not obtain or retain business through any unethical or illegal means, and all contract and transaction related payments, including those in connection with gifts and other expenditures, are declared with reasonable details. The company has developed this policy to prohibit conduct associated with fraud and corruption.

Fraud and corruption, including bribery, in all forms are behaviours that are contrary to RJV’s Foundations and culture. RJV is actively committed to preventing fraud and corrupt conduct throughout the organisation. RJV has developed this anti-corruption and fraud prevention policy as part of its overall risk management framework.

2. Scope

This policy applies to all RJV directors, and workers.

3. Guidelines

3.1 Reporting Fraud and Corruption

RJV promotes a culture that expects and encourages the reporting of improper conduct including fraud and corruption and is committed to protecting people who disclose reasonably suspected mismanagement, corruption, illegality, or some other wrongdoing.

Individuals who become aware of potential fraudulent and/or corrupt behaviours should report these inappropriate behaviours as soon as possible to their manager or through internal reporting channels including to the People and Culture Manger or HR Department.

If a worker does not feel able to use internal reporting channels due to the nature and/or seriousness of the inappropriate behaviour, they should raise the matter directly with the RJV Whistleblower service.

The whistleblower service can be contacted at <https://www.whistleblowingservice.com.au/rjv/>

Please refer to the RJV Whistleblower procedure for further details on submitting a report.

3.2 Investigation and Management of Fraud and Corruption

All reports of suspected fraudulent activity will be dealt with having regard to applicable laws such as privacy, confidentiality, legal professional privilege, and any requirements of natural justice. Investigations into suspected fraudulent activity will be undertaken on the assumption of the innocence of the person implicated. All reports of improper conduct will be thoroughly investigated with the objective of locating evidence that either substantiates or refutes the claims made.

The investigation will be conducted without bias and the person against whom the allegation is made should be given the right to respond.

Where it is found that a worker has knowingly or recklessly made a false report of fraud or corruption, that conduct itself will be considered a serious matter and render the person concerned subject to disciplinary proceedings as provided by the Code of Conduct.

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3.3 Facilitation Payments

The making of ‘facilitation payments’ either directly or indirectly through agents, contractors, or intermediaries is strictly prohibited.

A facilitation payment is a financial payment that may constitute a bribe and is made with the intention of expediting an administrative process. It is a payment made to a public or government official that acts as an incentive for the official to complete some action or process, to the benefit of the party making the payment.

3.4 Gifts and Entertainment

The company recognises that offering or accepting gifts and entertainment by workers which are moderate in value and proportionate are generally considered to be in accordance with business practice and maintaining good business relationships, for example, meals, theatre, sporting, and cultural events.

However, the exchange of gifts and entertainment may give rise to conflicts between the personal interests of workers and contracted parties and the interests of the company. Workers are prohibited from offering or accepting gifts or entertainment in circumstances which could give rise to, or appear to give rise to, improper acts and must always consider this policy when gifts or entertainment are offered.

Workers must always ensure that any gifts or entertainment offered, given, or accepted are proportionate and in line with the laws and common business practice of the location where the gift or entertainment occurs.

It is the company’s policy that gifts or entertainment with a value exceeding AUD\$500 per person must not be offered or accepted without the prior consent of the CEO or CFO.

Workers must report gifts or entertainment offered or received with a value over AUD\$500 to the finance team, so that such gifts or entertainment can be recorded in the Gifts and Entertainment Register. The CFO will regularly review the register.

4. Consequences of Breaching this Policy Sun-heading (delete if not necessary)

Incidents of fraud and corruption, including bribery, are viewed seriously by the company. RJV will decide whether or not to bring civil proceedings, refer for criminal prosecution or take disciplinary action, or a combination of these actions if allegations are proven.

Where appropriate, RJV will vigorously pursue the recovery of money or property lost through fraud or corruption.

5. Further Information

RJV’s expectations in relation to the reporting of improper conduct and inappropriate behaviour are included in the worker induction program and as part of ongoing training and awareness programs.

For additional information regarding this policy and reporting procedures, including the whistleblower service, please refer to the whistleblower procedure or contact RJV’s People and Culture Manager.

Tim Ryan

Chief Executive Officer

Revision	Release Date	Reviewer	Approver	Change Detail
1	27/10/2022	M.Fentiman	T.Ryan	First Release
2	05/07/2023	M.Fentiman	T.Ryan	Full Review

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