



# Fraud and Corrupt Conduct Control Policy

## 1. Purpose

Port of Townsville Limited (POTL) is committed to protecting its revenue, expenditure and property from attempts by employees and external parties to gain financial or other benefits through fraud and/or corrupt conduct. This Policy has been developed to protect POTL's property, and also to protect POTL's integrity, security and reputation.

In line with the above obligations and the Australian Standard on Fraud and Corruption Control (AS 8001-2008 Corporate Governance – Fraud and Corruption Control), the objectives of this Policy are to:

- Ensure internal and external instigated fraud and corrupt conduct against POTL is eliminated;
- Ensure that instances of fraud and corrupt conduct against POTL are detected in the event that preventative strategies fail;
- Ensure all property dishonestly appropriated is recovered or compensation equivalent to any loss suffered as a result of fraud or corrupt conduct is received;
- Ensure that fraud and corrupt conduct by POTL against any other entities is suppressed;
- Ensure that responsibilities for fraud and corrupt conduct are defined, and that all Managers, Supervisors, employees and others are aware of their responsibilities in relation to the ethical conduct of themselves and employees that they may be responsible for;
- Ensure appropriate mechanisms are in place for training and awareness, reporting, employee protection and investigations, and that these are communicated;
- Ensure that regular assessment of the risks of fraud and corrupt conduct are undertaken and fraud control plans are developed; and
- Reinforce the requirement for all employees and others to refrain from fraud, corrupt conduct, and maladministration, and encourage the reporting of any instance of fraud, corrupt conduct or maladministration.

## 2. Scope

This Policy applies to all Directors and employees of POTL.

The more detailed operational procedures supporting this Policy are specified in the Fraud and Corrupt Conduct Control Guidelines (POT 389).

## 3. Policy Statement

To improve POTL's strong corporate governance and due diligence environment, POTL is committed to introducing Fraud and Corrupt Conduct Control Guidelines. The aim of this Policy is to stimulate an environment that actively discourages fraud and corrupt conduct but in the event that such occurs, to provide a transparent framework for dealing with it.

## 4. Fraud and Corrupt Conduct Control Guidelines

This Policy is to be read in conjunction with the Fraud and Corruption Control Guidelines.

I, _____ have read the above Fraud and Corrupt Conduct Control Policy, understand it and agree to abide by its terms.
<b>Signature:</b> _____ <b>Date:</b> _____ / ____ / ____

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