

FRAUD AND CORRUPT CONDUCT CONTROL POLICY

1. Purpose

Port of Townsville Limited (the Port) 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 the Port's property, and also to protect the Port'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 Port is committed to:

- establishing a framework outlining the Port's fraud and corruption control objectives and values;
- setting the entity's anti-fraud and anti-corruption policies;
- developing, implementing, promulgating and maintaining a holistic integrity framework;
- fraud and corruption control planning;
- risk management including all aspects of identification, analysis, evaluation, treatment, implementation, communication, monitoring and reporting;
- implementation of treatment strategies for fraud and corruption risks with a particular focus on intolerable risk:
- ongoing monitoring and improvement;
- awareness training;
- establishing clear accountability structures in terms of response and escalation of investigations;
- establishing clear reporting policies and procedures;
- setting guidelines for the recovery of the proceeds of fraud or corruption;
- ensure that appropriate mechanisms are in place for the reporting of instances of Fraudulent and Corrupt Conduct which amounts to 'Corrupt Conduct' to the Crime and Corruption Commission; and
- implementing other relevant strategies.

2. Scope

This Policy applies to all Directors and employees of the Port.

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 the Port's strong corporate governance and due diligence environment, the Port 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, Control Policy, understand it and agree to abide by its terms.	have read the above Fraud and Corrupt Conduct	
Signature:	Date:	/ /

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