

Wheatbelt Natural Resource Management Incorporated

Fraud and Corruption Policy

Policy Name:	Fraud and Corruption Policy
Policy Number:	3.1
Policy Version Number:	V2.00
Policy Category:	Financial Management
Contact Officer:	Chief Executive Officer
Date Approved by the Board of Management:	4 May 2016
Date of Last Review:	26 April 2016
Period Until Next Review:	36 months from the approved date or earlier as required
Related Legislation:	<ol style="list-style-type: none"> 1. Associations Incorporation Act 1987 (Western Australia) 2. Australian Standard on Fraud and Corruption Control AS8001-2008
Related WNRM Policies or Procedures:	<ol style="list-style-type: none"> 1. 2.1 Code of Conduct 2. 2.2 Conflict of Interest Policy 3. 4.7 Whistleblower Policy

1. Definitions

“Corruption” means dishonest activity in which Representatives act contrary to the interests of the entity and abuse their position of trust in order to achieve some personal gain or advantage for themselves or for another person or entity.

“Fraud” means dishonest activity causing actual or potential financial loss to any person or entity including theft of moneys or property by Representatives or persons external to Wheatbelt NRM and whether or not deception is used at the time, immediately before or immediately following the activity. This also includes deliberate falsification, concealment, destruction or use of falsified documentation used, or intended for use, for a normal business purpose or the improper use of information or position.

“Representatives” means Board Directors, employees, contractors or volunteers of Wheatbelt Natural Resource Management Incorporated.

“Wheatbelt NRM” means Wheatbelt Natural Resource Management Incorporated.

2. Objective

The purpose of this policy is to:

- Protect the assets, interests and reputation of Wheatbelt NRM by identifying fraudulent and corrupt activity and establishing controls for prevention and detection of these activities.
- Reinforce the requirement for all Representatives to refrain from corrupt and fraudulent conduct
- Provide a framework for investigation of suspected fraudulent and corrupt activity
- Assign responsibility for control measures

3. Overview

For purpose of clarity, fraudulent and/or corrupt behaviour with respect to Wheatbelt NRM may include, but is not limited to:

- false accounting,
- the acceptance or provision of bribes in exchange for business,
- failure to declare a conflict of interest during a tender process,
- the undeclared use of a Wheatbelt NRM credit card for personal expenses,
- the falsification of data,
- disclosure of confidential information for other than a proper business purpose
- improperly exercising a delegated power
- misappropriation of funds, including the use of assets for private purposes

Fraud may lead to criminal conviction and Wheatbelt NRM is obligated to report any unlawful act of its Representatives.

Representatives who breach this Policy may be subject to disciplinary action.

The Whistleblowers Policy should be followed to identify the mechanisms for Representatives to report incidents of fraud or corruption

4. Policy Statements

Wheatbelt NRM requires all Representatives at all times to act honestly and with integrity and to safeguard the Wheatbelt NRM resources for which they are responsible.

Wheatbelt NRM is committed to protecting all revenue, expenditure and assets from any attempt to gain illegal financial or other benefits.

Any fraud or corruption committed against Wheatbelt NRM is a major concern and as a consequence all cases will be thoroughly investigated and appropriate disciplinary action will be taken against any Representative who is found guilty of corrupt or fraudulent conduct. This may include referral to the appropriate law enforcement or regulatory agencies for independent investigation.

It is the responsibility of all Representatives to report all suspected, attempted or actual fraud and corruption incidents. The Whistleblower Policy identifies reporting mechanisms.

The Audit Committee will fully investigate any reported allegation of fraudulent or corrupt conduct. The outcome will be reported to the Board of Management.

The Board of Management will make any decisions required concerning the outcome of the Audit Committee's report.

5. Responsible Officers

The Board of Management, as part of its governance authority, is responsible for the approval and publication of this Policy, including the approval of any subsequent changes.

The Audit Committee is responsible for reviewing this Policy prior to Board of Management approval, and ensuring the scheduled review of this Policy.

The Chief Executive Officer is responsible for the operational compliance of the organisation to this Policy.

Representatives have an individual responsibility to act appropriately in their roles and to report any observed or suspected fraudulent or corrupt behaviour.

6. Approval

This Policy was approved by the Board of Management on 4th May 2016.

Jim Sullivan
Chairperson
Board of Management
Wheatbelt Natural Resource Management Incorporated