

Thanksgiving Australia Incorporated

ABN 13 696 899 427

Fraud Risk Management Policy

1 Purpose of this Policy

This policy sets out our commitment to mitigate against fraud, theft, misappropriation, money laundering, the misuse of funds, bribery and corruption in the transfer of funds or provision of resources to our partners and third parties (**funds or resource misuse**). This includes ensuring that actual or perceived conflicts of interest (**conflicts of interest**) are appropriately identified, documented and managed.

Related policies to this policy are the Counter-Terrorism Policy and the Transfer of Funds Policy.

2 Scope of the Policy

This policy applies to all our personnel (being our Committee members, employees, volunteers, contractors and consultants).

3 Policy Statement

- (a) We will promote and implement best practice principles and practices to safeguard against funds or resource misuse.
- (b) We will exercise reasonable efforts to:
 - (i) minimise any risk of corruption, fraud, bribery or other financial impropriety by our Committee, employees, volunteers and third parties inside and outside Australia; and
 - (ii) identify and document any perceived or actual material conflicts of interest for our employees, volunteers, third parties and our Committee inside and outside Australia.
- (c) This policy will be embedded within our organisational culture and practices. We will create awareness in relation to counter-terrorism by distributing and explaining this policy to relevant personnel.

4 Policy in Practice

4.1 Due diligence

- (a) We will ensure that thorough due diligence is undertaken with respect to all entities we resource (including the provision of funds) (**approved partners**).
- (b) Our due diligence will include:
 - (i) identification of the relevant legal entity, structure, ownership and identity of its board or governing body of the approved partner;
 - (ii) review (on a risk assessment basis) of the governance, financial controls and procedures of the approved partner;

- (iii) identification of any connections or associations between the with respect to each approved partner, its members or governing body with public or Government officials or agencies;
- (iv) identification of any actual or potential conflicts of interest; and
- (v) screening as required under our Counter-Terrorism Policy.

4.2 Funds transfers

Funds transfers may only be made in accordance with our Transfer of Funds Policy.

4.3 Incident reporting and management

In the event of any incident where there has been, or suspected to have been, non-compliance with this policy or our obligations under a relevant law or any contract relating to funds or resource misuse:

- (a) personnel must inform our Public Officer immediately; and
- (b) our Public Officer must ensure that appropriate actions must be taken to address the incident including the following as appropriate:
 - (i) immediate cessation or suspension of resources (including funding) being provided (for example, to the relevant program, project or activity);
 - (ii) investigation of the incident; and
 - (iii) notification of the incident and steps taken to relevant authorities and to the other parties under the terms of a relevant contract (if and as required) and our Committee.

4.4 Awareness

We will ensure that our approved partners are aware of anti-fraud measures and take steps to mitigate against any of our funds or resources being misused:

- (a) We will discuss the issues of fraud, corruption and bribery with them during the development of relevant memoranda of understanding or partner agreements and ensure that such documents contain relevant undertakings in relation to fraud, corruption, bribery and counter-terrorism measures, including undertakings that the partner will require similar undertakings from their partners and sub-contractors who may be involved in any activity relating to our programs and projects.
- (b) We will monitor our partners' compliance with this policy and the undertakings in relevant memoranda of understanding or partner agreements from time to time (including, regular monitoring and testing).

5 Ownership, monitoring and Review of Policy

Our Committee owns this policy. This means that:

- (a) Our Committee will be provided with regular reports (but in any event no less than two (2) reports in each calendar year) by our Public Officer about compliance with this policy and where any compliance issue is identified, our Committee will ensure that the issue is addressed appropriately and promptly.
- (b) If any exception or departure from this policy is proposed, our Public Officer must be informed and our Public Officer will seek our Committee's prior approval to the

exception or departure. No action will be taken (or inaction allowed) until our Committee has made its decision on the proposed exception or departure.

- (c) Our Committee is responsible for reviewing this policy regularly (minimum every two years).
- (d) Any updates and revisions to this policy must be approved by our Committee.

6 Relevant laws:

Australian Charities and Not-for-profits Commission Act 2012 (Cth) and Australian Charities and Not-for-profits Commission Regulations 2013 (Cth), in particular:

- ACNC Governance Standards 1 and 3 (rr 45.5 and 45.15 of the above Regulations)
- ACNC External Conduct Standards 1 and 3 (rr 50.20 and 50.30 of the above Regulations).

7 Monitoring and Review of Policy

The Committee is responsible for reviewing this policy regularly (minimum every two years).

Any updates and revisions to this policy must be approved by the Committee.