

ANTI CORRUPTION AND BRIBERY POLICY

1. Introduction

YDR has a zero-tolerance approach to bribery and corruption. We believe business must be conducted honestly with integrity, including the Australasian Institute of Chartered Loss Adjusters (AICLA) Charter of Objects and Professional Conduct.

YDR is committed to ensuring compliance with Anti-Bribery and Anti-Corruption laws in Australia. YDR's Anti-Bribery and Anti-Corruption Policy establishes the approach, principles, and requirements essential for managing compliance with those laws and requirements.

The Policy applies to all employees, contractors, partners, and directors.

2. Policy statement

1. **Bribery** is the offering, promising, giving, accepting, or soliciting of an advantage as an inducement for action which is illegal or a breach of trust. A bribe is an inducement or reward offered, promised, or provided in order to gain any commercial, contractual, regulatory or personal advantage.
2. **Corruption** is the dishonest or fraudulent conduct by those entrusted with a position of authority to acquire illicit benefit or gain.
3. It is YDR's policy to conduct all of our business in a law-abiding, honest and ethical manner. We take a zero-tolerance approach to bribery and corruption. We are committed to acting professionally, fairly and with integrity in all our business dealings and relationships by implementing and enforcing effective systems to counter bribery.
4. We will uphold all laws relevant to countering bribery and corruption in Australia.

3. Scope

Who is covered by the policy?

In this policy, third party means any individual or organisation you come into contact with during the course of your work for YDR, and includes actual and potential clients, business contacts, agents, and government and public bodies.

This policy applies to all Partners, employees and contractors engaged by YDR, collectively referred to as personnel.

This policy covers:

- Bribes
- Gifts and hospitality
- Charitable contributions

Bribes

Personnel must not engage in any form of bribery, either directly or indirectly.

Gifts and hospitality

Personnel must not offer or give any gift or hospitality:

- i. which could be regarded as illegal or improper, or which violates the recipient's policies or
- ii. to any public employee, government officials or representatives.

Employees may not accept any gift or hospitality in excess of \$100 from any business associates unless previously authorised by or declared to the Administration Manager or Partner of YDR.

Charitable contributions

The giving and receiving of charitable support and donations is acceptable (and indeed encouraged) and can include knowledge, time or direct financial contributions.

If the donation intended to be made, or is actually made, to an entity or person other than a registered charity, the donation should be declared to a Partner.

Personnel must be careful to ensure that charitable contributions are not used as a scheme to conceal bribery.

Your responsibilities

1. You must ensure that you read, understand, and comply with this policy.
2. The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for YDR.
3. All personnel are required to avoid any activity that might lead to, or suggest, a breach of this policy.
4. You must notify your manager as soon as possible if you believe or suspect that a conflict with or breach of this policy has occurred or may occur in the future.
5. Personnel who breach this policy will face disciplinary action, which could result in dismissal for gross misconduct.
6. Any breaches of this policy will also be formally notified to AICLA.

4. How to raise a concern

You are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. If you are unsure whether a particular act constitutes bribery or corruption, or if you have any other queries or concerns, these should be raised with the Administration Manager or a Partner of YDR.

5. What to do if you are a victim of bribery or corruption

It is important that you tell your manager as soon as possible if you are offered a bribe by a third party, are asked to make one, suspect that this may happen in the future, or believe that you are a victim of another form of unlawful activity.

6. Protection

Personnel who refuse to accept or offer a bribe, or those who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. YDR aims to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

YDR is committed to ensuring no one suffers any detrimental treatment as a result of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion that an actual or potential bribery or other corruption offence has taken place or may take place in the future.