**Anti-Money Laundering and Anti-Bribery and Corruption Policy**

1. **Policy**

1. All Avery OKane Associates Pty Ltd (AOK) employees, subcontractors and service providers are to observe the highest standards of financial and ethical conduct. AOK has a “zero tolerance” policy towards fraud and corruption.

1. All AOK employees, subcontractors and service providers must comply with these Anticorruption and Integrity Policy and Procedures (the “Procedures”). However, as the procedures are administrative in nature they are subordinate to and do not remove or change the rights and obligations of each AOK recipient under any applicable national or international laws or under contract.

1. The Procedures are designed to prevent and combat misconduct, in particular fraud and corruption that may occur in connection with the activities of AOK. Prevention is the most important element of the strategy. Fraud and corruption practices need to be difficult to undertake without a high likelihood of detection, thereby acting as a deterrent. The Procedures set out the general principles and requirements applicable to AOK employees and persons and entities which receive funding or service contracts either directly or indirectly from the AOK Shareholders and Directors.

1. All AOK employees, subcontractors and service providers and such persons and entities which receive funding either directly or indirectly from AOK must take all appropriate measures to prevent and combat fraud and corruption, money-laundering and the financing of terrorism.

1. Each AOK employee has a duty to make arrangements to ensure that funding from AOK is used for the purposes for which it was deployed, with due attention to considerations of economy and efficiency and without regard to political or other noneconomic influences or considerations.

1. The Procedures cover fraud and corruption in the diversion of AOK funding for ineligible expenditures, as well as fraud and corruption engaged in for the purpose of influencing any decision as to the use of AOK funding.

1. The Procedures apply to AOK employees, subcontractors and service providers and all other persons or entities which either receive (either directly or indirectly) AOK funding for their own use, are responsible for the deposit or transfer of AOK funding (whether or not they are beneficiaries of such proceeds) or take or influence decisions regarding the use of AOK funding.

1. **Procedures for Preventing and Combating Fraud and Corruption in AOK Financed** **Activities**

1. The following provisions of the Procedures cover fraud and corruption that may occur during
the preparation and implementation of activities financed, either directly or indirectly, in whole or in part, using funding from AOK.

***Definitions of Practices Constituting Fraud and Corruption***

1. The Procedures address the following defined practices:

1. a “corrupt practice” is the offering, giving, receiving or soliciting, directly or indirectly, of anything of value to influence improperly the actions of another party;
2. a “fraudulent practice” is any act or omission, including a mis-representation, that knowingly or recklessly misleads, or attempts to mislead, a party to obtain a financial or other benefit or to avoid an obligation;
3. a “collusive practice” is an arrangement between two or more parties designed to achieve an improper purpose, including to influence improperly the actions of another party;
4. a “coercive practice” is impairing or harming, or threatening to impair or harm, directly or indirectly, any part of the property of the party to influence improperly the actions of a party;
5. an “obstructive practice” is:
6. deliberately destroying, falsifying, altering or concealing of evidence material to the investigation or making false statement to investigators in order to materially impede an AOK investigation into allegations of a corrupt, fraudulent, coercive or collusive practice; and/or threatening, harassing or intimidating any party to prevent it from disclosing its knowledge of matters relevant to the investigation or from pursuing the investigation; or
7. acts intended to materially impede the exercise of the AOK Participant’s contractual rights of audit or access to information.

1. The above practices are sometimes referred to collectively in the Procedures as “fraud and
corruption” or as “Sanctionable Practices”.

***Actions to be Taken to Prevent and Combat Fraud and Corruption by AOK Participants and***
***Recipients of funding from AOK whether directly or indirectly (“Recipients”)***

1. AOK Employees, Subcontractors and Service Providers (either directly or indirectly) will:
2. take all appropriate measures to prevent fraud and corruption in connection with the use of funding from AOK including (but not limited to):
3. adopting appropriate fiduciary and administrative practices and institutional arrangements to ensure that the funding from AOK is used only for the purposes for which it was given and so that any fraud and corruption can be easily detected, such as establishing an overall framework for controls; ensuring a separation of duties; monitoring systems and controls through internal and external audit;  discouraging conflicts of interest and maintaining interest registers; ensuring procedures for selection and training of directors and employees support the selection of honest and competent individuals; and
4. ensuring that all employees and recipients (either directly or indirectly) receive a copy of these Procedures and are made aware of and adhere to their contents;

1. immediately report any allegations of fraud and corruption in connection with the use of funding from AOK;

1. if it is determined that a AOK Participant or Recipient has engaged in corrupt, fraudulent, collusive, coercive or obstructive practices in connection with the use of AOK funds, action will be taken in accordance with the laws of the country within which the offence occurred;

1. include such provisions in any agreements with Recipients as may be required to give full effect to these Procedures, including (but not limited to) provisions (i) requiring such Recipient to abide by the Procedures, (ii) requiring such Recipient to permit the AOK’s representatives to inspect all of their accounts and records and other documents relating to the project required to be maintained pursuant to the agreement and to have them audited by, or on behalf of, the AOK, and (iii) requiring restitution by such Recipient of any amount of the funding from AOK with respect to which fraud and corruption has occurred; and

1. cooperate fully in any investigation into allegations of fraud and corruption in connection with the use of funding from AOK Shareholders.

1. **Anti-Money Laundering and Combating the Financing of Terrorism**

1. Consistent with UN Security Council Resolutions relating to terrorism, including UNSC Resolution 1373 (2001) and 1267 (1999) and related resolutions, AOK is committed to the international fight against terrorism, and in particular, against the financing of terrorism. It is the policy of AOK to seek to ensure that none of its funds are used, directly or indirectly, to provide support to individuals or entities associated with terrorism. To those ends, AOK is committed to taking appropriate steps to ensure that funding from AOK is not used to provide assistance to, or otherwise support, terrorists or terrorist organizations, and AOK employees and contractors will inform the Directors who will determine that any such funds have been so used.
2. AOK Participants shall institute, maintain and comply with, and shall use commercially reasonable efforts to cause each Recipient to institute, maintain and comply with, appropriate policies, procedures and controls that are in compliance with applicable national laws and regulations for anti-money laundering and combating the financing of terrorism (“AML/CFT”). In the case of AOK Employees, sub-contractors or funding recipients such procedures and controls shall include but not be limited to:
a. a written policy on AML/CFT;
b. due diligence requirements;
c. record keeping.

1. **Reporting Requirements**

1. In addition to such other reporting requirements as may be required by the AOK shareholders, each AOK Participant shall confirm in writing to its supervising entity that to the best of its knowledge and belief:

1. neither it nor any of its respective affiliates acting on their behalf, nor any other person acting on their behalf, has engaged in any activity, nor entered into any transaction, prohibited by any resolution issued by the United Nations Security Council under Chapter VII of the UN Charter (All employees shall confirm in writing that they act in accordance with UN Charter Chapter VII available at <http://www.un.org/en/sections/un-charter/chapter-vii/>);

1. after due inquiry, it is not involved with any party that is an entity or person (i) sanctioned pursuant to any United Nations Security Council resolution issued under Chapter VII of the UN Charter, (ii) on the World Bank Listing of Ineligible Firms from time to time (www.worldbank.org/debarr or any successor website or location) or (iii) convicted, indicted, or subjected to any similar criminal sanction, by any court or governmental body of competent jurisdiction, for engaging in money laundering or financing of terrorism or any Sanctionable Practice; and

1. All AOK supported projects that it is responsible for are in compliance with their
obligations under these Procedures.
2. **Anti-Bribery and Corruption Policy for AOK Employees, Sub-Contractors & Service Providers**

The Company, and their respective officers and employees shall comply with the AOK Anti-Corruption and Integrity Policy and Procedures and the following provisions of this Section:

1. Offering Bribes

The Company, and their respective staff will not offer or make any bribe, unorthodox or unauthorised payment or inducement of any kind to anyone and for whatever purpose, including soliciting a potential investment for AOK or to facilitate the making of any such investment.

1. Acceptance of Bribes

The Company, and their respective staff will not accept any kind of bribe, unorthodox or unauthorised payment or inducement of any kind from anyone, for whatever purpose, including in relation to the making of a potential investment by AOK or to facilitate its approval by AOK.

1. Reporting

The Company’s staff will report promptly to the Shareholders of AOK any request for, or any offer of, a bribe or unorthodox payment or inducement and will refuse any such request or offer in such clear and unequivocal terms as can lead to no misunderstanding or false expectation.

1. Facilitating Payments

The Company will not and will procure that its staff and any consultants and advisors engaged to act on its behalf will not, make facilitating payments to progress any matter through local officials.

1. Partners, Purchasers Etc.

The Company and each participant will not, and any consultants and advisors engaged to act on its behalf will not, knowingly enter into arrangements with third party private sector partners or purchasers in relation to the Development or sale of a project opportunity who have offered or accepted bribes or made facilitating payments in relation to that Opportunity.

Signature \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Name: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Position: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Company: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Date: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

# Version Control:

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| **Person** | **Update:** | **Vetted:** |
| Christa Avery | January, 2020 | Matthew O’Kane |
| Matthew O’Kane | March, 2024 | Christa Avery |
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