



FRAUD

RELATED POLICIES AND DOCUMENTS:

QUEST

Risk

Whistle Blower

Values

Code of Conduct

Suppliers Code of Conduct

Introduction

Fraud and theft deprive our shareholders of value, erode trust and breach our integrity with customers, so any act of theft or fraud is incompatible with Toxfree's values and will not be tolerated. This policy states Toxfree's zero tolerance approach to fraud and theft.

Objectives

The objective of this policy is to:

- Explain our zero tolerance approach to fraud and theft, and
- To articulate how Toxfree will enforce a zero tolerance approach.

The means of achieving these objectives are defined within the Toxfree Fraud Control Plan and processes.

Principles

- All acts of fraud or theft will be independently investigated,
- Suppliers/external agencies found to have cooperated in such acts will also be investigated and subject to removal as a supplier for Toxfree or referral to Police,
- Substantiated acts of fraud or theft will be subject to dismissal, in accordance with the Just Culture principles, for Gross Misconduct and may be referred to the Police,
- Personnel who notify or report potential acts of fraud or theft will be protected through the Toxfree Whistle-blower policy,
- Toxfree will instigate a training and education program to ensure personnel are aware of their obligations pertaining to fraud, theft and integrity and understand our zero tolerance policy,
- Toxfree will conduct regular, fraud auditing and checks to ensure acts of fraud or theft are detected and acted upon, and
- Personnel found to have concealed, cooperated or condoned acts of fraud or theft will be subject to the same sanctions as those who have committed the act of fraud or theft unless they have availed themselves of the protections within the Whistle Blower policy.

Stephen Gostlow
Managing Director

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