

P-03 Anti-Fraud and Corruption Policy

Arden Energy Pty Ltd (ACN 660 438 219) · Version 1.0 · Effective 1 July 2026 · Next review 1 July 2027

1. Statement

The company has zero tolerance for fraud, bribery, corruption, money laundering and the financing of terrorism. This applies to directors, employees, contractors, suppliers, consortium partners and anyone acting for the company, in every country where the company operates. It covers all of the company's activities, including those paid in whole or part from grant or donor funding.

Where a role is not yet filled, the Board appoints a person to carry out its duties until it is.

2. Definitions

- **Fraud:** dishonestly obtaining a benefit or causing a loss by deception, including false invoices, inflated costs, false timesheets and misreporting results.
- **Corruption:** offering, giving, asking for or receiving anything of value to influence a decision.
- **Prohibited practices** also include collusion, coercion and obstruction of an investigation.

3. Rules

1. No gifts or hospitality above AUD 100 or equivalent in value are given or accepted. All gifts offered are recorded in the gift register kept by the Finance and Grants Officer.
2. No facilitation payments are made.
3. No funds are paid to a person on a sanctions or debarment list.
4. Funder money is never used for political donations, personal costs or any cost outside the approved budget.
5. Claims, timesheets and invoices are accurate and supported by documents.

4. Prevention

1. Segregation of duties and payment limits (P-01).
2. Open competition (P-02).
3. Declarations of interest signed on engagement and at the start of each procurement (P-05).
4. Annual fraud risk assessment by the Board, recorded in the risk register.
5. Annual training of all staff on this policy.
6. Suppliers and partners accept this policy in their contracts.

5. Reporting and investigation

1. Anyone who suspects fraud or corruption reports it to the Board, or to the whistleblower register contact published on the company's governance page. If a Board member is involved, the report may be made directly to the funder or the authorities. Reports can be made anonymously.
2. The company starts an investigation within 5 business days. The investigation is independent of the area concerned.
3. The company reports any credible suspicion involving funder money to that funder within 10 business days, and cooperates with any investigation by the funder or its oversight body.
4. Proven fraud leads to dismissal or termination of the contract, recovery of funds and referral to the authorities.
5. No one is penalised for a report made in good faith.

6. Recovery

Funds lost to fraud are recovered from the responsible party, and any funder money affected is returned to the funder as the funding agreement requires.

7. Review

The Board reviews this policy each year.

Document control

Version	1.0
Effective	1 July 2026
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