

2.2.9 Anti-Bribery Policy

Spaceframe is committed to maintaining an environment in which fraud, bribery and corrupt conduct is not tolerated. Spaceframe has a zero tolerance to fraud, bribery and corrupt conduct. Spaceframe will take steps to ensure that staff members know of their obligations in relation to fraud, bribery and corrupt conduct, including identification and reporting of suspected fraud, bribery and corrupt conduct.

Any allegations of fraud, bribery or corrupt conduct will be investigated with the level of enquiry depending on the seriousness of the issue. Accordingly, Spaceframe may take appropriate disciplinary action if warranted which may include termination of employment or non-renewal of an appointment or contract. Spaceframe may also notify the Police and or other relevant agencies, as required under funding agreements and/or legislation.

This policy will be implemented to ensure:

- a. compliance with relevant legislative requirements, standards and prevailing community standards of best practice,
- b. compliance with Spaceframe policies and procedures,
- c. there is adequate orientation, awareness and available information on fraud, bribery and corrupt conduct detection and prevention, and
- d. the investigation procedure is fair to both the person suspected of fraud, bribery or corrupt conduct and the person or people who suspect fraud, bribery or corrupt conduct has occurred.

2.2.9.1 Prevention

Spaceframe will incorporate fraud, bribery and corrupt conduct risk assessment and monitoring into the annual risk assessment process coordinated by the Directors. This process is designed to determine fraud, bribery and corrupt conduct risks, determine the strength of existing controls and to identify additional risk treatments to manage or mitigate risk issues.

Each member of the Senior Management Team is responsible for reviewing Spaceframe's fraud, bribery and corrupt conduct risk assessment and ensure suitable prevention strategies are implemented to mitigate the Spaceframe's potential fraud, bribery and corrupt conduct risks in so far as they apply to their area.

2.2.9.2 General Preventative Measures

The Senior Management Team will formally address and assist in the management of fraud by:

- a. periodically reviewing this document and associated risk assessments, to ensure they are up-to-date and that controls are effective;
- a. monitoring any potential opportunities for staff or related party fraud in all Spaceframe business arrangements, transactions, financial and commissioning activities;
- b. segregation of functions or duties, to ensure that no one person can be in a position to control sufficient stages of processing a single or stream of transactions such that error or defalcation could occur without a reasonable chance of detection;
- c. ensuring that any transactions, offers or other representations which are made on behalf of Spaceframe must be checked and validated by at least one other competent and authorised person.
- d. ensuring commissioned providers have auditable and transparent management systems for any services that are subcontracted;
- e. effective verification of contracted healthcare provider invoices - to prevent fraud associated with healthcare providers claiming for more consultation sessions than actually delivered;
- f. ensuring the flow of Spaceframe business activities are designed so that each function with potential for fraud is performed by separate people and/or separate portfolios - the objective of which is to ensure that no one person can misappropriate assets or improperly record a transaction without detection;
- g. separating key duties for:



- i. invoice processing and payments,
 - ii. banking and account transactions, and
 - iii. accounting reconciliations;
 - h. ensuring that an appropriate instrument of financial delegations exist and aim to ensure that:
 - i. balance is achieved between operational efficiency and appropriate controls over financial expenditure; and
 - ii. transactions are appropriate and authorised, and
 - iii. no fictitious transactions are recorded and that all transactions can be readily audited if and when required; and
 - i. ensuring that intellectual property, personal information, electronic and hard copy data, and assets are appropriately safeguarded and only accessed by authorised persons.
- I.

Where it is not possible for tasks to be segregated, independent management checks are to be performed by employee's managers or supervisors, as part of the risk management and mitigation strategy.

2.2.9.3 Monitoring

Regular review of operations will be undertaken through:

- a. incorporating fraud, bribery and corrupt conduct risk monitoring into the annual risk assessment,
- b. reporting annual risk assessment (and key findings) to the Board
- c. presenting annual risk assessment key findings to the Senior Management Team to affirm the effectiveness of internal controls and fraud, bribery and corrupt conduct prevention strategies across their functional areas of responsibility,
- d. adoption of a continual quality improvement approach to fraud, bribery and corrupt conduct prevention strategies including:
 - i. regular reviewing the appropriateness of management system documents and key controls, and
 - ii. regularly reviewing authorisations/delegations.

2.2.9.4 Detection

Spaceframe will conduct an annual risk assessment of internal controls and fraud, bribery and corrupt conduct prevention strategies to ensure that they are operating in accordance with this document and that they are effective in managing and mitigating risk.

Any person who suspects or becomes aware of any fraudulent activity must immediately, or as soon as practicable, report the details to their Manager and/or Directors. Spaceframe maintains a commitment to providing a clearly defined hierarchical reporting and decision-making structure (see Spaceframe organisational chart) with respect to suspected instances of fraud, bribery and corrupt conduct.

Jane Raspotnik – Director - Administration

Peter Raspotnik – Managing Director