ACCOUNTABILITY AND TRANSPARENCY POLICY

1. POLICY STATEMENT
   a. Decision making will be open and transparent.
   b. Operations will be conducted in an ethical and accountable manner.
   c. Financial resources and physical infrastructure will be managed in an efficient and effective manner.
   d. Information will be accessible in adherence with legislative requirements, or any corresponding internal policies.
   e. Enquiries, concerns and complaints will be responded to in a timely manner.
   f. Financial oversight, service standards and performance reporting (and all other accountability documents) will be made available and accessible, to encourage public involvement and interest.
   g. Members in management or authoritative positions will have corresponding mechanism.
   h. Donors receive updates on the progress of their funding, made available through the website, electronic communication or direct mail.
   i. All activities and funds raised by the Company will be directed towards not-for-profit initiatives, and no such non-developmental activities will occur as a result of Company funding.

2. DEFINITIONS
   a. Accountability refers to BETTER (Building East Timor Through Education/ Resources) promise to demonstrate responsibility for its actions, decisions and policies.
   b. Transparency refers to the principle that business will be conducted in an accessible, clear and visible manner, and that all activities are open to examination and scrutiny by stakeholders.

3. PURPOSE
   a. This policy provides guidance on BETTER (Building East Timor Through Education/ Resources) intends to ensure that matters are approached in an accountable and transparent manner, with emphasis on openness, ethics, performance outcomes and fiscal responsibility.
4. APPLICATION
   a. This policy applies to all BETTER (Building East Timor Through Education/ Resources) operations, unless deemed necessary by the Board of Directors, and not in violation of any relevant legislation.

5. POLICY REQUIREMENTS
   a. Legislated Requirements
      i. Corporations Act 2001
      ii. Sarbanes-Oxley Act 2002
      iii. Associations Incorporation Act 1984
      iv. Corporations Amendment (Corporate Reporting Reform) Act 2010 (Cth)
   b. Financial Reporting
      i. Annual Audit by External Auditor(s)
      ii. Annual Report
      iii. Annual and Quarterly Financial Statements
      iv. Short and Long Term Financial Plans
      v. General Meetings (Board of Directors, AGM)
   c. Performance Measurement
      i. Annual Report
      ii. Strategic Plans
      iii. Performance Reports (Board of Directors)
      iv. Monitoring and Evaluation Reports
   d. Internal Accountability and Ethical Standards
      i. Code of Conduct
      ii. Constitution
      iii. Anti-Fraud and Anti-Corruption Policy
      iv. Conflict of Interest Policy
      v. Complaints Handling Policy

6. RESPONSIBILITIES, MONITORING AND CONTRAVENTIONS
   a. All management are liable (to the extent outlined in BETTER (Building East Timor Through Education/ Resources) for their own actions and their behavior will be monitored as such to ensure that it is both ethical and aligned with the ethos of the Company.
   b. Formal complaints that have been lodged to BETTER (Building East Timor Through Education/ Resources) will be handled with in accordance to the BETTER (Building East Timor Through Education/ Resources) Complaints Handling Policy.