



ANTI-FRAUD AND ANTI-CORRUPTION POLICY

1. BACKGROUND

- a. This policy is based on the specific risks outlined by the Fraud and Corruption Risk Assessment conducted by BETTER (Building East Timor Through Education/ Resources). This policy correlates with BETTER (Building East Timor Through Education/ Resources) values, as outlined in the BETTER (Building East Timor Through Education/ Resources) Code of Conduct and Constitution, and applicable legislation.

2. DEFINITIONS

- a. *Fraud* refers to any wrongful, unethical or criminal conduct intended to deceive others.
- b. *Corruption* refers to dishonest or fraudulent misconduct.

3. PURPOSE

- a. This policy provides guidance on how BETTER (Building East Timor Through Education/ Resources) intends to ensure that matters are approached in an honest and genuine manner, with emphasis on openness, ethics and fiduciary duties.

4. APPLICATION

- a. This policy applies to all BETTER (Building East Timor Through Education/ Resources) Operations and correlates with all relevant legislation and practices on fraud, corruption and fiduciary obligations.

5. POLICY STATEMENT

- a. BETTER (Building East Timor Through Education/ Resources) will supply all employees with relevant education on fraud and corruption, applicable legislation and company policies and attitudes towards fraud and corruption in training.
- b. BETTER (Building East Timor Through Education/ Resources) will take an open and proactive approach to dealing with fraud and corruption within the organisation. Employees are encouraged to report suspicions and known cases of fraud and/or corruption.
- c. Contraventions of this policy and/or any relevant cases of fraud and corruption will result in immediate review of the employee's position by the Board of Directors and the lodgment of report(s) to the relevant authorities, if applicable.



- d. All relevant due diligence will be conducted on current and potential partners BETTER (Building East Timor Through Education/ Resources) to ensure that the integrity of the organisation is upheld in all operations.
- e. All employees of the organisation are bound by the BETTER (Building East Timor Through Education/ Resources) Accountability and Transparency Policy.
- f. All employees of the organisation are bound by the BETTER (Building East Timor Through Education/ Resources) Conflict of Interest Policy.
- g. All employees of the organisation are bound by the Control of Funds and Resources Policy.
- h. All employees of the organisation are bound by the Acceptance and Refusal of Funds Policy.
- i. All employees of the organisation are bound by the Non-Development Activity Policy.
- j. All employees of the organisation are bound by the relevant State and Federal legislation, including, but not limited to: disclosure, fiduciary obligations and informed consent.

6. RESPONSIBILITIES, MONITORING AND CONTRAVENTIONS

- a. All management are liable (to the extent outlined in the BETTER (Building East Timor Through Education/ Resources) Constitution) 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.