



## 1. Purpose

Vital Anaesthesia Simulation Training (VAST) is committed to operating in a manner consistent with the laws and regulations of the jurisdictions in which it operates, including those relating to anti-bribery, fraud and corruption. Furthermore, VAST is dedicated to the highest standards of integrity, fairness and ethical conduct. This policy is a critical part of VAST's overall risk management processes to prevent and detect corrupt, illegal or otherwise undesirable conduct.

## 2. Objectives

This policy sets out to:

- support the success of VAST's mission and vision and to uphold its values
- define what fraud and corruption means within VAST
- embed a culture of zero tolerance towards bribery, fraud and corruption
- provide a framework for managing and reducing the risks of bribery, fraud and corruption in the context of VAST's activities in Australia and abroad

## 3. Guiding principles

This policy applies to all of VAST's activities and transactions in all countries in which it operates, and covers:

- VAST affiliate entities
- all directors, officers, employees, consultants, contractors and volunteers of VAST (collectively referred to as 'representatives')

Business partners associated with VAST, who act with, for or on behalf of VAST, or who perform functions in relation to or on behalf of VAST, are expected to comply with policies managing bribery and corruption risk. VAST may request copies of a Business Partner's anti-bribery and corruption policy. Where no such policy exists, or is deemed to be inadequate, VAST expects its Business Partners to comply with this policy.

Persons covered by this policy are required to read, understand and comply with the Policy.

## 4. Scope

This document applies to all VAST office bearers, staff and volunteers associated with Vital Anaesthesia Simulation Training (VAST), as well as to all those with whom VAST has professional dealings

## 5. Dictionary

Term	Meaning
<b>Bribery</b>	<p>Either directly or indirectly improperly offering or providing a benefit, inducement or something of value, either to a public either to a public official, someone in business or a close relative of such a person in order to obtain or retain business or an advantage or to induce or reward improper conduct or an improper decision. While a bribe may involve a monetary payment or offer, it covers anything of value such as:</p> <ul style="list-style-type: none"> <li>- cash or cash equivalents (e.g. gift vouchers or loans)</li> <li>- some gifts, hospitality, entertainment or travel</li> <li>- political or charitable donations or scholarships</li> <li>- reciprocal favours or the provision of favours (e.g. discounted or 'free' VAST services or use of VAST facilities or property)</li> <li>- business and employment opportunities</li> <li>- anything else that is of significant value to the recipient.</li> </ul>
<b>Fraud</b>	<p>Dishonestly obtaining a benefit, or causing a loss, knowingly by deception or other means. "Benefit" refers to both tangible items, such as money or objects, and intangible benefits including power, status or information.</p>
<b>Corruption</b>	<p>The offering, giving, soliciting, or acceptance of an inducement or reward that may improperly influence the action or inaction of a person or entity. Examples of corruption include bribery, conspiracy, extortion.</p>
<b>Representatives</b>	<p>VAST office bearers, staff and volunteers associated with Vital Anaesthesia Simulation Training.</p>
<b>Business Partners</b>	<p>Includes, but is not limited to, contractors, consultants, third party agents, introducers, referrers, persons acting in a fiduciary capacity, service providers and joint venture partners in any of VAST's operations.</p>

<b>Facilitation Payment</b>	Any payment to a public official either directly or indirectly as an incentive for the public official to facilitate, expedite or secure the performance of a routine government action or process (for example, to facilitate the expedition of applications for visas or licences).
<b>Money Laundering</b>	Concealing the existence of an illegal source of income and disguising that income to make it appear legitimate.
<b>Secret Commissions</b>	Benefits that are given, offered, received or solicited by an agent or representative of another person or entity, where that benefit is: <ul style="list-style-type: none"> <li>- not disclosed to the principal; and</li> <li>- given, offered, received or solicited as an inducement or reward for providing or having provided a favour, or the receipt of which would tend to influence the provision of a favour.</li> </ul> For example, a payment to an agent of a customer or supplier where that agent does not disclose that payment to the customer or supplier, and in return, the agent facilitates favourable commercial terms with that customer or supplier.

## 6. Policy

### 6.1 Bribery and corruption

Corrupt conduct by VAST and its Representatives is expressly prohibited. VAST and its Representatives are not permitted to give, offer, promise, accept, request or authorise whether directly or indirectly, any bribe, kickback or form of improper payment (however small). Further, VAST and its Representatives must not, directly or indirectly, authorise, undertake or participate in any form of corrupt business practice including:

- making a facilitation payment
- paying any secret commission
- engaging in money laundering

### 6.2 Fraud

VAST and its Representatives must not, directly or indirectly, authorise, undertake or participate in any form of Fraud.

### 6.3 Risk mitigation

VAST will take all reasonable steps to ensure funds are not directed for the purposes of Bribery, Fraud, Corruption or any other improper conduct.

Risk mitigation strategies may include, but are not limited to:

- requesting staff to undertake appropriate anti-fraud, anti-corruption and money laundering training
- remaining compliant with all State and Commonwealth laws of Australia that relate to bribery, fraud, corruption and money laundering
- taking reasonable steps to be aware (and training staff and volunteers in being aware) of any risks in relation to bribery, fraud, corruption or other improper conduct that VAST may be exposed to within its operations around the world including taking necessary precautions where such a risk is evident
- taking reasonable steps to identify all beneficiaries and third parties with whom VAST works
- conducting background checks to confirm the identity and integrity of a beneficiary or a third party. In ensuring proper identification methods of beneficiaries and third parties, VAST will seek to obtain and maintain the following information on beneficiaries and third parties with whom it deals:
  - o names and other contact details
  - o for individuals, date of birth and nationality
  - o details of current projects, operations, commitments or involvements being conducted or undertaken and the beneficiaries or third parties involved in such
- where it is not practical to identify each beneficiary individually, VAST is committed to ensuring and maintaining an understanding of the particular group of beneficiaries such as the community, village, town or region (as the case may be) that is being assisted
- in relation to funding, VAST will maintain accounts in accordance with international and local accounting standards, and ensure that funds are only used for intended purposes.

### 6.4 Record keeping

VAST and its Representatives must keep accurate and complete accounts, invoices, and other documents and records relating to dealings with any external or third party, which evidences the business reason for these dealings. No accounts may be kept “off-the- books” for any reason or be treated / managed in a way so as to facilitate, conceal or disguise potential breaches of this policy or any other VAST policies. Further, VAST representatives must:

- not make any false or misleading entries in the books and records of VAST
- ensure contracts, invoices and other documents relating to Business Partners and third-party relationships accurately describe the transactions to which they relate
- abide by payment control procedures
- abide by requirements to record and obtain approvals for payments and expenses, including those relating to gifts, hospitality, entertainment, travel, charitable donations, sponsorships, political donations and community engagement activities.

### 6.5 Reporting on suspected breaches

Any breaches, suspected breaches, suspicious activities or payments should be reported in accordance with the VAST Complaints Policy or VAST Whistleblower Policy. The Board will be informed of any material breaches of this policy. Processes are in place to ensure that reports are logged, investigated and appropriate action is taken. Measures are in place to ensure complaints are treated confidentially to the extent possible, and consistently with legislative protections.

### 6.6 Consequences of breaching the policy

Any breach of this policy by Representatives will be regarded as serious misconduct, leading to disciplinary action which may include termination of employment. Breaching this policy may also breach applicable anti-corruption laws and expose an individual to criminal and civil liability, which could result in imprisonment or the imposition of a significant financial penalty. Representatives and business partners must cooperate fully and openly with any investigation by VAST into alleged or suspected corrupt activity or breach of this policy. Failure to cooperate or to provide truthful information is a breach of this policy.

## 7. Related and supporting documents

- VAST Conflict of Interest Policy
- VAST Code of Conduct
- VAST Complaints Policy
- VAST Whistleblowing Policy

## 8. Document revisions

Version	Date approved	Summary of Changes
v1.0	24 Oct 2020	