

Anti-Corruption / Anti-Bribery Policy

Corruption is viewed as a set of circumstances whereby there is dishonest or fraudulent conduct by people or groups who are in a position of power in regard to their capacity for the granting of potential benefit, business opportunity or positive outcome. It implies that there is a risk that professional judgment or actions regarding a primary interest will be unduly influenced by a secondary interest.

Secondary interests can relate to the perceived potential for benefit by way of financial gain, professional benefit, reputation, personal relationship, securing business or strategic alliances. It is the specific positive or negative inducement to encourage the misuse of power.

AAMC Training and its subsidiary companies are committed to conduct business in compliance with the law, including all applicable anti-bribery and anti-corruption laws in all countries in which the Company operates.

To the extent that laws and regulations in any countries are more rigorous or restrictive than this Policy, those laws and regulations should be followed by any subsidiary operating in that country. AAMC Training may, from time to time, provide country-specific directions for subsidiaries operating in countries outside of Australia.

1. Scope

This policy and procedure applies to all directors, managers, employees and contractors of AAMC Training Group within all countries, other than casual employees, except 'eligible' casual employees.

This policy is without regard to any regional customs, local practices or competitive conditions.

AAMC Training fully supports its employees who comply with this standard and no employee will be disciplined for refusing to engage in conduct that is contrary to this standard in the event that we lose or do not secure business as a result.

2. Forms of Corruption

AAMC Training prohibits bribery, corruption and extortion in all forms.

Employees are prohibited from directly or indirectly offering, giving, soliciting or receiving any form of bribe, kickback, payment or anything of value to or from any person or organisation including government agencies, individual government officials, private companies or their employees under any circumstances. Gifts, entertainment or travel must not be given or received as a reward or encouragement for preferential treatment.

AAMC Training does not participate in party politics. It does not make payments to political parties or individual politicians.

Employees are prohibited from using any funds, assets, resources, time or employees including in-kind contributions of services to make any political contribution or assist any party or individual politician or candidate.

AAMC Training does not make charitable donations or sponsorships that could be perceived as bribes or payments to gain an improper business advantage.

3. Avoiding and Managing Business Integrity issues

A risk mitigation approach is adopted in managing any potential corruption issues. The following hierarchy is applied in the consideration of any potential issue arising.

AAMC Training determines that the CEO and Divisional Managers are entrusted officers and have the accountability to ensure;

- A register is held at a Head Office level of any gifts, expenditures made or benefits of any kind (in excess of the equivalent to AUD\$300 from any one company or any of its employees/representatives) that are made or provided to any group or individual, or received by an employee or officer of AAMC Training. This register is reviewed and audited by the RTO Director on a biannual basis.
- Employees or officers of AAMC Training are aware that they are required to seek prior approval before accepting any gift, or benefit in kind from a supplier, customer, public or private agency. Approval to be provided in writing by a Divisional Manager.
- Disclosure – It is an employee's responsibility to notify their Divisional manager at a minimum level of any approach, implied or actual offer of bribe, payment, gift, benefit or threat to themselves or in the event that they suspect any activity involving a third party.
- All internal or external allegations or concerns raised regarding a potential issue will be managed at the National Manager level with the Managing Director with reference to this policy. The delegate for any disciplinary action arising will be the Managing Director and could result in a finding of gross misconduct and immediate termination.