



# Fraud and Anti Corruption Policy

In this policy, "**Walker**" means Walker Corporation Pty Limited (ACN 001 176 263) as trustee for the L A Walker Family Trust (ABN 92 134 623 291), Walker Group Holdings Pty Limited (ACN 001 215 069) and all their respective Australian domiciled controlled and related entities.

## Purpose

Walker is committed to conducting business ethically, with integrity, and in accordance with the law. Walker is also committed to doing the right thing and takes a zero tolerance approach to any form of fraud and corruption (including bribery). Fraudulent or corrupt activity of any kind, whether or not for the benefit of Walker, is strictly forbidden.

This Policy applies to all individuals, including directors, officers, employees, contractors, or consultants, who are employed by, act for, or represent Walker (**Walker Personnel**).

## What is Fraud?

Fraud is dishonest, wrongful or criminal activity with the intent of obtaining a financial or personal gain that adversely affects another person or entity including, but not limited to, theft of moneys, or other property, where deception is used.

This includes the deliberate falsification, concealment, destruction or use of falsified documents used or intended to be used for a normal business purpose, or the improper use of information or position for personal financial benefit.

Fraud can be committed by Walker Personnel or by a person external to Walker.

Examples of fraud may include, but are not limited to:

- diversion of cash (eg, accounts payable, accounts receivable);
- falsifying invoices or employee expense reimbursements;
- dishonest or intentional misleading financial performance reporting;
- theft of assets (eg physical assets, cash, equipment, supplies); or
- theft of data, information, intellectual property or personal or corporate identities.

## What is Corruption?

Corruption is activity in which Walker Personnel or persons external to Walker act contrary to the interests of Walker or the entity they represent, and abuse their position of trust to achieve direct or indirect personal gain or advantage for themselves or another person or entity. Bribery is a form of corruption.

Bribery is the act of offering, promising, paying or accepting, directly or indirectly, a benefit with the intention of influencing another individual who is expected to act in good faith or in an impartial manner, to perform that function dishonestly, or to obtain and retain an advantage in the course of business.

Bribery can take many forms including, but not limited to:

- giving cash or excessive gifts, including accommodation or travel;
- paying secret commissions;
- making inflated tenders or false invoices; or
- blackmailing or leveraging personal information to obtain an advantage.

## **Managing the risk of fraud and corruption**

Walker Personnel must not under any circumstances, whether directly or indirectly, engage in conduct that constitutes fraud or corruption (including bribery).

Examples may include the offer or acceptance of improper financial or other inducements, such as bribes, kickbacks, cash, gifts, or entertainment that are intended to influence or reward favourable commercial, regulatory, and governmental decisions. Walker Personnel must not engage with business partners whose conduct may constitute or be perceived as corrupt.

All Walker employees (permanent, casual, temporary, fixed term) receive induction training on the Walker Code of Conduct and this Policy, and prior to commencing an employee's duties they will be required to make a declaration that they have read, understood and agree to comply with the Walker Code of Conduct and this Policy. Walker may request an employee to complete an updated declaration at any time during their employment.

## **Reporting**

Walker is committed to a culture in which Walker Personnel can raise and report incidents of suspected fraud and corruption.

Walker will assess and investigate all allegations of fraud and corruption. Should any Walker Personnel be alerted to any behaviour which may indicate fraud or corruption, this should immediately be reported to their Manager, the Walker Group General Counsel or in accordance with the Walker Whistleblower Policy (noting that confidential and anonymous disclosures can be made for this purpose). For further details on disclosures of a serious nature, please refer to the Walker Whistleblower Policy.

## **Fraud and Corruption Assessment**

On receiving a report, the Group General Counsel, the Chief Financial Officer and the Chief Operating Officer (in consultation with the relevant Manager and notifying Walker Personnel) will assess the situation, conduct an investigation and report to the Chief Executive Officer. The Chief Executive Officer will make a determination on the incident reported.

Walker Personnel should provide all relevant information to assist with the investigation (where possible) including:

- incident date
- description of the incident and how it was identified; and
- potential impact to Walker and to third parties (financial, reputational, environmental, political)

Fraud and corruption incidents that are reported in accordance with the Whistleblower Policy will be managed in accordance with the terms of that Policy.

## **Responding to Fraud and Corruption**

As far as possible, and subject to legal and regulatory obligations, Walker will endeavour to maintain the confidentiality of Walker Personnel so as to protect against reprisals or victimisation. Law enforcement agencies or regulators may need to be notified of the fraudulent conduct.

Where permitted by law, Walker will attempt to recover any money or assets stolen or fraudulently misappropriated, and seek criminal or civil restitution.

## **Review**

This Policy is reviewed and updated every two years, or earlier if there are changes in legislative or regulatory requirements, or changes to the industries in which Walker operates, or changes to Walker's operations.