

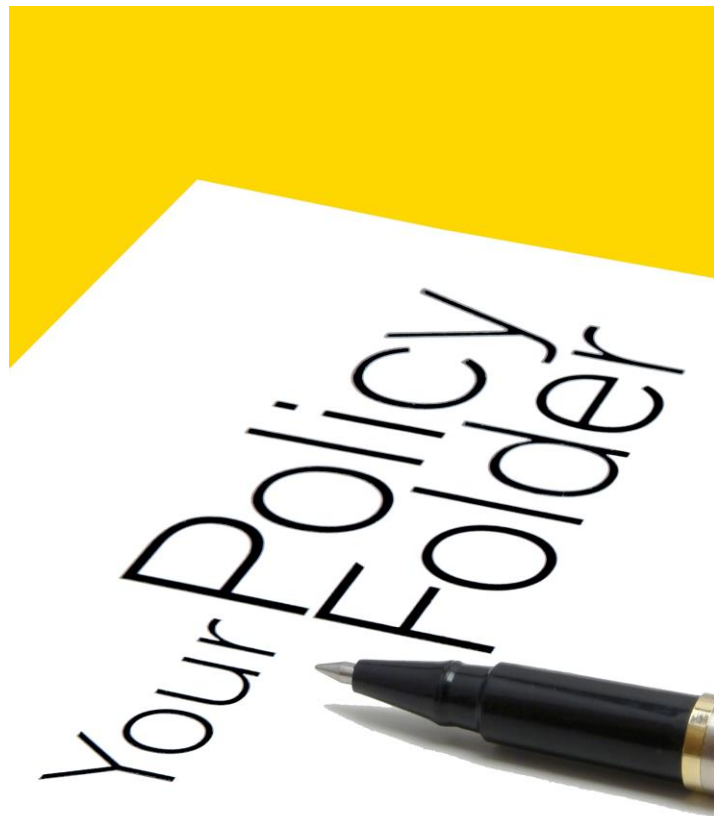
# Anti-Bribery and Corruption Policy



Maxima Cleaning Group

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## Introduction



Corruption and bribery are two issues that plague many organisations across the world. Our policy outlines the ethical and legal standards expected of workers at all levels and define the consequences of violating these standards.

### Review Procedure

The Managing Directors will review the policy as required. The review schedule is directed in response to organisational and/or legislative changes and requirements. The review will be undertaken in consultation with workers, company representatives, and other relevant parties. All relevant persons will be made aware of changes made because of the review.

This policy will be reviewed if:

- there are changes in the workplace that may affect the policy;
- the policy is not effective;
- there are legislative changes that affect the policy;
- there is a breach of this policy.

This policy is reviewed at least annually.

## Regulations and Guidelines

Fair Work Act 2009

Cleaning Services Award (MA0000022)

National Employment Standard (NES)

## Terminology

### Definitions

Bribery is when someone offers or receives something of value in order to sway a public or legal official's actions.

Corruption is dishonest or fraudulent conduct by those in power, typically involving bribery.

We, us, our, our company or the organisation" means Maxima Cleaning Group.

Worker: is a person who carries out work in any capacity for an Organisation, including work as:

- |                                          |                                                  |
|------------------------------------------|--------------------------------------------------|
| a. An employee, or                       | f. A person of a prescribed class, or            |
| b. Outworker, or                         | g. A contractor or subcontractor, or             |
| c. An apprentice or trainee, or          | h. A worker of a contractor or subcontractor, or |
| d. A student gaining work experience, or | i. A worker of a labour-hire company.            |
| e. A volunteer, or                       |                                                  |

Workplace – means a place where work is carried out for a business or undertaking and includes any place where a worker goes or is likely to be while at work. A workplace includes:

- A vehicle, vessel, aircraft, or other mobile structure; and
- Any waters and installations on land, on the bed of any waters or floating on any waters.

# Anti-Bribery and Corruption Policy

Maxima Cleaning Group is committed to conducting business ethically and honestly and is committed to implementing systems to prevent bribery and corruption from occurring. The organisation has a zero-tolerance approach to bribery and corruption. This includes instances where a bribe may not occur but is promised to be given or agreeing to receive a bribe.

Every representative of Maxima Cleaning Group must act with integrity and understand and comply with the policy and procedures.

Bribery and corruption involve offering, giving, authorising, soliciting, promising, or accepting of a benefit to any person where the benefit is:

- not legitimately due, e.g., a legal, commercial transaction; and
- offered or given to influence a person in some manner or gain an advantage; and
- sought by dishonest or fraudulent conduct for personal gain; and
- illegitimate, immoral, or incompatible with our ethical standards.

Bribery can include (monetary or otherwise) but is not limited to:

- cash payments or cash equivalents, e.g., shares, cryptocurrency; and
- loans or other transactions; and
- unwarranted allowances; and
- kickbacks; and
- political contributions and charitable contributions; and
- employment opportunities; and
- social benefits; and
- sexual favours; and
- gifts, travel, and hospitality; and
- use of company services or facilities.

Any breach of this policy or breach of the law could result in disciplinary action, including dismissal or, in relevant cases, the police informed where offences might carry criminal liability.

## WORKER RESPONSIBILITIES

- All workers must read, understand, and comply with the information contained within this policy and associated procedures, and with any training information you are given.
- All workers are responsible for the prevention, detection, and reporting of bribery and other forms of corruption.
- Workers are required to avoid any activities that could lead to, or imply, a breach of this anti-bribery policy.

## THIRD-PARTY ARRANGEMENTS

- Arrangements with all third parties will be subject to clear contractual terms, including specific provisions requiring them to comply with minimum standards and procedures relating to bribery and corruption.
- We will not engage, or continue business with, any third party who we know or reasonably suspect of engaging in bribery or corruption.
- All payments and commissions must:
  - be made following Maxima Cleaning Group payment policies; and
  - be made through the accounts payable system and be fully accounted for; and
  - be in line with generally accepted rates and business practice for the service in question; and
  - be made per the terms of the contract.
- No staff member will suffer penalties or other consequences for refusing to pay bribes, even if a refusal may result in loss of business or a delay in proceedings.

**GIFTS, HOSPITALITY, AND EXPENSES**

- Workers (or representatives) must obtain approval from their direct supervisor (or in the case of directors or officers from the CEO) before accepting or offering any gift or hospitality where it is reasonably foreseeable that it will exceed \$200.
- Giving small gifts without expectation of receiving anything in return, e.g., birthdays, Christmas. Is acceptable.
- All gifts and hospitality should be reasonable and given in the ordinary course of business.
- Lavish or unreasonable gifts or hospitality, both given or received, are unacceptable.
- Special care to be taken to avoid even the appearance that the giving or accepting of gifts or hospitality might influence decisions made on behalf of Maxima Cleaning Group.

**PUBLIC OFFICIALS**

- Authorisation from your direct supervisor or operations manager, must be sought before any entertaining, contracting with, or offering or making payments to public officials is undertaken.
- Gifts to public officials are strictly prohibited.
- Any authorised entertainment for public officials must be modest and reasonable.
- We will not make donations, whether in cash, kind, or by any other means, to support any political parties or candidates.
- All interactions with public officials reviewed carefully to determine what additional safeguards may be necessary to protect Maxima Cleaning Group.

**REPORTING**

- All workers are responsible for the prevention, detection and reporting of bribery or corrupt activity.
- Report bribery and/or corruption to a supervisor and/or complete the *HR Incident and Investigation Report Form*.
- If you have reason to believe or suspect that an instance of bribery or corruption has occurred or will occur in the future, you must notify direct supervisor or operations manager as soon as possible.
- We will ensure it takes appropriate action in response to any reported incidents of bribery or corruption.

Signature:

Date:

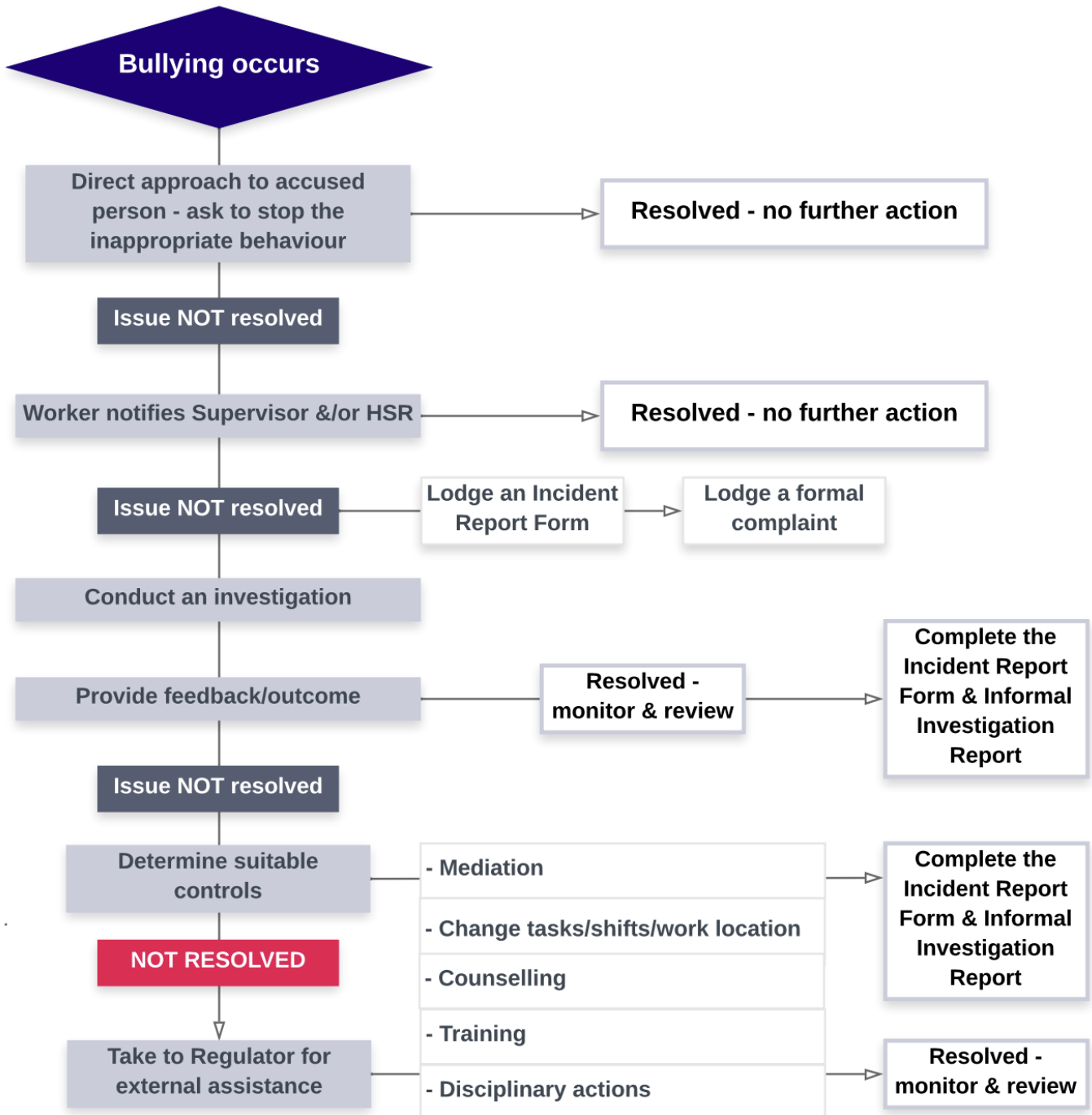
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*Director*

# HR Incident and Investigation Report Form

Administrative use only. Date Submitted:

## INCIDENT REPORT AND INVESTIGATION FLOWCHART.



**INFORMAL COMPLAINT**

1. The complainant may wish to communicate directly with the person with whom they have a concern and ask that they refrain from further conduct of that nature.
2. If direct communication is not possible or does not resolve the complainants' concerns, they should then discuss the matter with their direct supervisor or operations manager, who will explain potential strategies for dealing with the conduct complained of.
3. The complainant, in consultation with HR manager, will decide on a course of action to attempt to resolve the matter.
4. If deemed appropriate, we may be able to assist in the informal resolution process by the appointment of a mediator agreed to by the parties involved, who may be able to help the parties resolve the matter.
5. After achieving a satisfactory resolution, the issue will be monitored by HR manager to ensure there are no re-occurrences or further concerns.
6. Records kept during the resolution process.

**FORMAL COMPLAINT**

1. Where a complainant's endeavours to resolve a complaint informally have failed, he or she may choose to make a formal complaint.
2. The particulars of the complaint must be submitted in writing to the General Manager. This would include a completed Incident/Injury Report Form and any supporting statements or documents.
3. The General Manager will investigate the complaint in consultation with the relevant persons. The investigation will follow and apply the principles of Natural Justice.
4. After completing the investigation, the General Manager will make a finding as to whether bullying has occurred, or whether it is likely to have happened.
5. The General Manager will then submit a detailed report with a recommended course of action to the appropriate decision-maker (senior management).
6. An appropriate course of action will then be decided and implemented, in consultation with all relevant persons.
7. If required, assistance to achieve an acceptable resolution will be initiated with an appropriate external authority.

PERSONS INVOLVED		
Name of person reporting:	Are you a worker? <input type="checkbox"/> Yes <input type="checkbox"/> No	
Phone:	Mobile ph.:	
Email:		
Managers' Name:	Managers' ph.	
Managers' Email:		
Name of the complainant (if different than person reporting):		
Complainants' address (if not a worker):		
Are you a worker? <input type="checkbox"/> Yes <input type="checkbox"/> No	Email:	
The Complainants' ph.:	Mobile ph.	
Complainants' Managers' Name (if a worker):		
Managers' ph.	Managers' Email:	
Was medical treatment required?	<input type="checkbox"/> No <input type="checkbox"/> First Aid <input type="checkbox"/> Nurse <input type="checkbox"/> Doctor <input type="checkbox"/> Hospital	
Description of behaviour/incident:		
Location:	Time:	Date:
Name of the accused person of the offence (if known):		
Are you a worker? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unknown		

**Type of incident:**

- Verbal abuse    Threatening behaviour    Armed assault    Physical assault    Property damage  
 Sexual harassment    Discrimination/Equal opportunity (specify):

Describe incident: (provide as much detail as possible, including events leading up to incident ) The format who, what, where, when and why can help describe the incident.

Describe immediate actions taken (e.g. security/police/manager/co-worker called)

Was medical attention/first aid required?  Yes  No (Describe injuries and first aid provided):

**WITNESSES: List names and contact details**

Witness 1- Name: \_\_\_\_\_ Witness role  Worker  Customer  Other?

Address:

Contact No: \_\_\_\_\_ Email: \_\_\_\_\_

Witness 2- Name: \_\_\_\_\_ Witness role  Worker  Customer  Other?

Address:

Contact No: \_\_\_\_\_ Email: \_\_\_\_\_

Witness 3- Name: \_\_\_\_\_ Witness role  Worker  Customer  Other?

Address:

Contact No: \_\_\_\_\_ Email: \_\_\_\_\_

Witness 4- Name: \_\_\_\_\_ Witness role  Worker  Customer  Other?

Address:

Contact No: \_\_\_\_\_ Email: \_\_\_\_\_

**FOLLOW UP**

Has a police report been submitted?  Yes  No      Has an investigation been initiated?  Yes  No

Reporting person name: \_\_\_\_\_ Sign: \_\_\_\_\_

Supervisor name: \_\_\_\_\_ Sign: \_\_\_\_\_