



Anti-Bribery & Corruption



Anti-Bribery & Corruption – Policy Statement

Walker Newman and Associates Pty Ltd (WNA) is committed to conducting our business with honesty, integrity and to the highest ethical standards. We have a zero tolerance approach to bribery and corruption.

We follow this policy because it is the right thing to do, not because we feel obligated.

Who does this apply to

This policy applies to the Directors, management and staff of WNA, including any organisations or contractors/subcontractors we may engage to assist us in the delivery of the services we offer (collectively “we” in the remainder of this policy document).

What we will do

Our policy commitment means that we will:

- Not attempt to influence a person or organisation corruptly or improperly.
- Not provide bribes, kickbacks, facilitation payments, unreasonable or extravagant gifts, unjustified allowances or expenses in any circumstances.
- Not accept bribes, kickbacks, facilitation payments, unreasonable or extravagant gifts, unjustified allowances or expenses in any circumstances.
- Not attempt to elicit information from a person or organisation which cannot be considered as ‘public domain’.
- Not divulge information we have about a client/project which cannot be considered as ‘public domain’.
- Not partake in any practice which does not comply with the local law applicable in the area of our work.
- Not partake in any practice which does not comply with Australian law, regardless of where the work is undertaken.
- Not knowingly engage with any person or organisation who/which does not meet the highest ethical standards in all of their activities.
- Not collude with our competitors in an attempt to ‘fix’ pricing.

Our policy commitment means that we may:

- Make donations to charitable organisations, not for profit organisations (e.g. World Vision, Tear Australia, etc.) or charitable causes (e.g. Movember, Ride for a Cause, etc.).

- Offer hospitality to colleagues, clients and potential clients provided that the hospitality is not of a nature, value or timing which could be construed as an attempt to influence a decision on the part of the colleagues, clients, potential clients.
- Accept hospitality from colleagues, clients and potential clients provided that the hospitality is not of a nature, value or timing which could be construed as an attempt to influence a decision which may be made/influenced by WNA.

Our policy commitment means that we will:

- Act in the best interests of our clients.
- Be transparent in our dealings with our clients.
- Make decisions and recommendations based on objective, documented criteria.

Authorised by: **Rick Newman, Director**

28th April 2016, Rev 1

A handwritten signature in black ink, appearing to be 'RN', written in a cursive style.