

Approved by: Aaron Hair
Position: Director
Dated: 27/07/2022
Reviewed: 13/04/2026

Signature: 

ANTI-BRIBERY, CORRUPTION & FRAUD POLICY

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1. Purpose

Ethos Building Pty Ltd (Ethos) is committed to conducting its business lawfully, ethically, and with integrity. This includes:

- Complying with all applicable laws and regulations, including those relating to anti-bribery and corruption; and
- Maintaining the highest standards of honesty, fairness, and ethical conduct.

This Anti-Bribery, Corruption and Fraud Policy (Policy) forms a key component of Ethos' risk and compliance framework and establishes requirements to prevent, detect, and respond to bribery, corruption, fraud, and other improper conduct.

This Policy establishes Ethos' zero-tolerance approach to bribery, corruption, fraud, and other improper conduct. It applies to all employees and business partners.

2. Definitions

For the purpose of this Policy:

- Bribery means offering, giving, receiving, or soliciting anything of value to improperly influence a decision or gain a business advantage.
- Corruption means dishonest or improper conduct, including abuse of position or power for personal or business gain.
- Facilitation Payment means a payment made to secure or expedite a routine government action.
- Public Official includes any government employee, official, or representative, including those of state-owned enterprises.
- Fraud means any intentional act or omission designed to deceive for financial or personal gain.

3. Scope

This Policy applies to all business activities and transactions undertaken by Ethos in all jurisdictions in which it operates.

It applies to:

- Ethos and all subsidiary and affiliated entities over which it exercises control; and
- All directors, officers, and employees of Ethos, whether permanent, fixed-term, casual, or temporary (collectively referred to as Employees).

This Policy also applies to all individuals and entities who act for or on behalf of Ethos, or who perform services in connection with its business (collectively referred to as Business Partners). This includes, but is not limited to, contractors, consultants, agents, introducers, referrers, fiduciaries, service providers, and joint venture partners.



This Policy governs all interactions with clients (including insurers and loss adjusters), suppliers, and other third parties in connection with Ethos' business activities.

All Business Partners must comply with this Policy.

Ethos may require Business Partners to demonstrate compliance with this Policy and may terminate relationships where compliance is inadequate.

4. Responsibilities

All persons covered by this Policy are responsible for:

- Understanding and complying with this Policy;
- Completing any required training; and
- Promptly reporting any suspected or actual breaches in accordance with this Policy.

All obligations in this Policy that apply to Employees also apply to Business Partners where relevant to the services they provide to or on behalf of Ethos.

5. Consequences of Breach

Bribery, corruption, fraud, and other improper conduct may constitute criminal offences and may result in serious consequences for both Ethos and the individuals involved, including substantial fines, civil liabilities, imprisonment, and reputational damage.

Any breach of this Policy by Employees will be treated as serious misconduct and may result in disciplinary action, up to and including termination of employment.

Breaches of this Policy may also result in violations of applicable laws, exposing individuals to civil and criminal liability, including financial penalties and imprisonment. Ethos' insurance policies may not provide coverage for conduct that involves a breach of this Policy.

Employees and Business Partners must cooperate fully and honestly with any investigation into suspected or actual breaches of this Policy or related misconduct. Failure to cooperate, or the provision of false or misleading information, constitutes a breach of this Policy.

6. Reporting

Employees and Business Partners must promptly report any suspected or actual breaches of this Policy, including any suspicious activities or payments.

Reports may be made through one or more of the following channels:

- The individual's direct manager (where applicable);
- A Director; or



- Ethos' Whistleblower Policy and reporting channels (where applicable).

All reports will be appropriately recorded, assessed, and investigated, and suitable action will be taken where required.

Ethos will treat all reports confidentially to the extent possible and in accordance with applicable laws and whistleblower protections.

Ethos prohibits any form of retaliation against any person who reports a concern in good faith or has reasonable grounds to suspect a breach of this Policy. Any actual or attempted retaliation constitutes a breach of this Policy.

7. Bribery and Corruption

Corrupt conduct by Ethos and its Employees is strictly prohibited.

Ethos and its Employees must not, directly or indirectly, give, offer, promise, accept, request, or authorise any bribe, kickback, or other improper payment, regardless of value.

Ethos and its Employees must also not authorise, undertake, or participate in any form of corrupt business practice, including but not limited to:

- Making facilitation payments;
- Paying or receiving secret commissions; or
- Engaging in money laundering.

Under no circumstances will Ethos offer, make, request, or receive any improper payment or other thing of value to obtain or retain business or to influence a business decision. Such conduct is a breach of this Policy and may constitute a criminal offence.

This prohibition applies to dealings with public officials (including foreign public officials) as well as to all commercial transactions in the private sector.

This Policy also applies to Business Partners, who are required to comply with these prohibitions when acting for or on behalf of Ethos.

No Employee or Business Partner will be penalised or disadvantaged for refusing to engage in conduct that would breach this Policy, even where such refusal may result in a loss of business.

8. Fraud

Ethos and its Employees must not, directly or indirectly, engage in any form of fraud.



Employees must take reasonable steps to prevent, detect, and report fraudulent conduct and must comply with all applicable internal controls and procedures.

9. Ethos relationships with Third Parties

Improper conduct by a third party, including Business Partners, may expose Ethos and its Employees to criminal or civil liability and may result in reputational damage or other sanctions.

Ethos may also be held responsible for the conduct of third parties acting on its behalf, including agents, representatives, contractors, and others involved in business activities such as tendering, negotiating contracts, or facilitating business introductions.

Ethos and its Employees must not:

- Enter into or continue a business relationship with a Business Partner unless satisfied that the Business Partner will act in a manner consistent with this Policy; or
- Engage or make a payment to a Business Partner or any other third party where there is knowledge or reasonable suspicion that any part of the payment may be used, directly or indirectly, as a bribe, kickback, secret commission, or other improper payment.

Ethos will undertake appropriate due diligence prior to engaging third parties and will monitor such relationships on an ongoing basis to ensure compliance with this Policy.

10. Gifts and Hospitality

Ethos prohibits the offering or acceptance of gifts or hospitality that are inconsistent with this Policy. This includes circumstances where the gift or hospitality:

- Could give rise to undue or improper influence over a business decision or relationship;
- Could create the appearance of seeking favourable treatment;
- Creates a sense of obligation;
- Is excessive or outside normal business practice; or
- Is not permitted by applicable law or the recipient's duties.

Gifts and hospitality are only permitted where all of the following conditions are met:

1. Provided solely for legitimate business relationship purposes;
2. Not intended, and not reasonably capable of being perceived, as influencing a decision or obtaining a business advantage;
3. Given or received in an open and transparent manner;
4. Compliant with all applicable laws and this Policy;
5. Not cash or cash equivalents (including vouchers or gift cards), except where expressly permitted under an approved Ethos policy or program);



6. Gift hampers (including seasonal or promotional hampers) are not permitted to be accepted or provided under any circumstances, due to their potential to create perceived obligation or undue influence.
7. Approved by the Director in writing in advance where the value exceeds \$250;
8. Reasonable and appropriate in the circumstances;
9. Not likely to cause embarrassment to Ethos or any individual if publicly disclosed; and
10. Not offered or accepted during a tender, procurement, or negotiation process.

Gifts or hospitality that are frequent, recurring, or which create an expectation of ongoing provision, or which exceed acceptable value or frequency thresholds, are not permitted.

Where there is any uncertainty regarding the appropriateness of a gift or hospitality, Employees must seek guidance from a Director prior to accepting or providing it.

These requirements apply to both Employees and Business Partners.

11. Political and Charitable Donations and Community Engagement

Ethos does not make donations to any political party or to any individual in, or seeking to obtain, political office.

Charitable donations and community engagement activities are permitted, including through financial contributions, in-kind support, or employee participation. However, such activities must:

- Be lawful and ethical;
- Not be used to improperly influence a business decision or relationship; and
- Not be used to conceal bribery, corruption, or other improper conduct.

Employees making charitable donations or sponsorships in a personal capacity must make it clear that they are not acting on behalf of Ethos.

All charitable donations made by Ethos must be appropriate, transparent, and consistent with this Policy.

12. Record Keeping

Ethos and its Employees must maintain accurate and complete accounts, invoices, and records relating to all dealings with third parties. These records must clearly reflect the nature and purpose of the transactions.

No accounts or records may be kept “off-book” or maintained in a manner that could facilitate, conceal, or disguise improper conduct or breaches of this Policy.



Employees must:

- Not make any false or misleading entries in Ethos' books and records;
- Ensure that contracts, invoices, and other documents accurately describe the transactions to which they relate;
- Comply with all applicable financial and payment control procedures; and
- Comply with requirements to record and obtain approvals for payments and expenses, including those relating to gifts, hospitality, charitable donations, sponsorships, and community engagement activities.

13. Exceptions and Variations from Policy Requirements

Employees will not be penalised for providing a payment or benefit where there is a reasonable belief of imminent physical harm to themselves or another person if the payment or benefit is not made.

If a payment or benefit is made in these circumstances, the Employee must:

- Immediately report the matter to a Director; and
- Promptly record the details, including the amount of the payment or nature of the benefit, the identity of the recipient, and the circumstances in which it was made.

Any other exceptions or variations from this Policy must be approved in advance by a Director.

14. Training and Communication

Ethos will ensure that Employees, including new Employees, and relevant Business Partners are informed about and understand this Policy.

All Employees will have access to this Policy and will receive appropriate training. Employees in higher-risk roles may receive additional or more frequent training.

A copy of this Policy will be made available internally and on the Ethos company website.

Any questions regarding this Policy should be directed to a Director.

15. Review of Policy.

This Policy will be reviewed periodically to ensure it remains effective and reflects any changes in applicable laws, regulations, and business practices.

Any updates to this Policy must be approved by the Director.

