

Fraud, Bribery and Corruption Prevention Policy

1 Purpose

Fleetwood Limited (**Fleetwood**) is committed to conducting its business ethically, honestly and with integrity, as set out in its Code of Conduct.

Fleetwood does not engage in or tolerate corrupt business practices and is committed to maintaining and implementing appropriate measures to prevent bribery and corruption by Fleetwood, and any person representing Fleetwood (including its directors, officers, employees, contractors, subcontractors, agents and any other party representing it or under its operational control (**Employees and Representatives, or “you”**)).

The purpose of this Policy is to:

- explain what conduct is expected of Fleetwood and its Employees and Representatives in connection with preventing fraud, bribery and corruption; and
- provide information and guidance on how to recognise and deal with potentially corrupt conduct (or know who to ask for assistance), to help you to comply with this Policy and your legal obligations.

2 Who Does This Policy Apply to?

This Policy applies to Fleetwood and its Employees and Representatives. Adherence to this Policy is mandatory.

3 What is Fraud?

Fraud is dishonest activity causing actual or potential financial loss to any person or entity including theft, and where deception is used at the time, or immediately before or after the activity. It includes destruction, concealment and falsification of documents and the improper use of information or position for personal financial gain. Examples of fraud may include, but are not limited to:

- Diversion of cash (accounts payable and receivable schemes)
- Falsifying expense claims or false invoicing
- Deliberately misleading financial performance reporting
- Theft, unauthorised use or misuse of assets, secret commissions, records and confidential information
- Unauthorised use of a credit card
- Any computer related activity involving the alteration, destruction, forgery or manipulation of data

If you have any doubts about whether an activity, decision or action constitutes fraud or is otherwise inappropriate, you should seek guidance from the General Counsel & Company Secretary by emailing companysecretary@fleetwood.com.au.

Anonymous disclosures can be raised by using one of the reporting channels specified in Fleetwood's Whistleblower Policy.

4 What is Bribery & Corruption?

Anti-bribery and corruption laws (**ABC Laws**) are laws prohibiting bribery and corruption in various jurisdictions that may apply to the activities of Fleetwood, its business partners, joint venturers or third parties operating on its behalf. These laws are broad and prohibit corrupt conduct in relation to both public activities (involving domestic and/or foreign public and government officials) and private activities (involving only private entities).



Bribery is offering, promising, giving or accepting anything of value with the intention of improperly influencing a person's performance of their duties.

Corruption means dishonest activity involving the abuse of position or trust to get an advantage or benefit not legitimately due (whether a personal advantage or an advantage for Fleetwood). It includes bribery, but captures a broader category of unethical or dishonest conduct.

Bribery or corrupt conduct can take many forms and is often disguised. Examples of common types of bribery or corrupt conduct include, but are not limited to:

- cash or cash equivalent such as shares, gift cards, discounts, kickbacks etc;
- extravagant gifts, entertainment or hospitality;
- benefits and 'perks' including employment, education, training, etc;
- inflated fees or commissions (or inflated or false invoices);
- "facilitation payments" also known as "grease payments" (that is, a small payment or other inducement provided to a public or government official in order to secure or expedite a routine function that the official is ordinarily obliged to perform already eg, the grant of a licence);
- political/charitable contributions;
- uncompensated use of Fleetwood services or facilities;
- another advantage not legitimately due (whether financial or not) or anything else of value.

It helps to bear in mind that:

- Bribery may be indirect, for example, involving an intermediary or agent of the person giving or accepting the bribe.
- Bribes need not involve large sums of money and in fact, a bribery offence can occur even if no money is exchanged at all.
- The offence of bribery can occur even if the bribe is 'unsuccessful' (eg, the outcome sought/conduct sought to be induced does not occur).

5 Complying with this Policy and ABC Laws

Fleetwood Employees and Representatives are responsible for managing fraud, bribery and corruption risk through the identification, assessment and treatment of risks. You can play a critical role in preventing and detecting fraud, bribery and corruption and helping minimise the likelihood of fraud occurring at Fleetwood.

You must:

- **Understand** what fraud, bribery and corruption are by reading this Policy and completing any further related training offered by Fleetwood.
- **Be aware** of your responsibilities and adhere to Fleetwood's Code of Conduct and other policies.
- **Be transparent** in your position against fraudulent, corrupt or unethical conduct.
- **Never:**
 - offer, request, or receive bribes of any kind to or from any person;
 - help, encourage, conspire with, or ask another person to offer a bribe; or
 - make, arrange, or direct the making of a facilitation payment.
- **Be vigilant** for signs of potential fraud or corrupt conduct (signs that corrupt conduct may be occurring include an employee's resistance to taking annual leave or a person living beyond their means).
- **Maintain accurate records** of dealings with third parties.



- **Report suspicious behaviour** and fraud or corruption vulnerabilities as soon as possible to your line manager or supervisor, or in accordance with Fleetwood's Whistleblower Policy.
- **Always act in the best interests of Fleetwood** and not abuse your position for personal gain.
- **Co-operate** with any investigation and assessment of suspected fraud, bribery or corruption incidents.

If you have any questions about your responsibilities, or whether fraud, bribery or corruption has occurred, or have received pressure to provide a bribe or act dishonestly, you should contact the General Counsel & Company Secretary for guidance.

6 Investigation and Assessment of Incidents

The General Counsel & Company Secretary will assess any reported or detected incident of fraud, bribery or corruption, and will recommend a course of action and develop a management plan. Employees and Representatives should provide all relevant information to assist with the assessment where possible.

The General Counsel & Company Secretary will record all reports and maintain a list of suspected fraud, bribery or corruption, and identify any relevant evidence regarding the incident(s).

The General Counsel & Company Secretary will notify the Risk Committee of any material breaches of this Policy as soon as practicable.

Fraud, bribery or corruption incidents that are reported in accordance with the Whistleblowing Policy will be managed in accordance with the terms of that Policy.

Subject to legal and regulatory obligations, Fleetwood will take all reasonable measures to keep confidential the identity of reporting individuals and those involved in any suspected conduct.

7 Breaches of this Policy

Failure to comply with this Policy may result in substantial fines and penalties being imposed upon Fleetwood, and may expose Fleetwood and its Employees and Representatives to civil or criminal liability or other financial or reputational damage.

Anyone who breaches this Policy may face disciplinary action up to and including dismissal. Depending on the circumstances, Fleetwood may also refer matters to regulatory and law enforcement agencies and will seek the recovery of money or property stolen or fraudulently misappropriated.

8 Review

This Policy will be reviewed and updated by Fleetwood's Board when applicable and appropriate, including when there are changes in business practice, legislation and compliance obligations.

