



Anti-Corruption Policy

Lee Kelly & Associates Pty Ltd trading as Lee Kelly Commercial Investigations (Lee Kelly) is committed to upholding the highest levels of professional standards and conduct. We have based our anti-corruption policy on proven experience and best practice. A summary of this policy is outlined below.

The policy

All of our staff and subcontractors (which will be collectively referred to in this document as staff) are responsible for corruption prevention and detection. Any such behaviour will always be reported to management. Our general principles for ensuring anti-corruption are as follows:

Should any person offer a bribe or any Lee Kelly staff member seeks a bribe, it is against Lee Kelly company policy, it is a criminal offence under the NSW Crimes Act and it is a corrupt act under the ICAC Act.

We understand that while corrupt behaviour need not involve a criminal act such as being bribed to steal something, it can involve a corrupt act such as giving a person a benefit to which they are not entitled.

The following steps provide our staff with clear procedures on how to manage and prevent corrupt behaviour at Lee Kelly:

1. If any staff member is offered a bribe, they must immediately terminate the conversation, task or meeting. If it happens on Lee Kelly property, they must excuse themselves and immediately contact their manager or supervisor, who will inform the Lee Kelly managing director.
2. If corrupt behaviour happens in the field, our staff must return to the office and as soon as possible and record what happened. For example, they must record the person(s) involved, location, time and exact words used. This is vital for their protection and may be used in an investigation.
3. Offers of money or bribes in any form should never be accepted. Under no circumstances should our staff endanger themselves or attempt a citizen's arrest. Lee Kelly management will contact the appropriate authorities.
4. When an ambiguous and potentially corrupt statement is made such as "We might be able to sort something out" or "Perhaps I can do you a favour", clarification of this statement must be sought. It is important to clarify whether it's a simple misunderstanding or an attempt at bribery and corruption.

Gifts, favours and hospitality

Lee Kelly has strict policies regarding the acceptance of gifts, favours and hospitality. We simply state that our staff cannot demand or accept any type of financial payment, gifts or favours for services performed in the normal course of duties, whether before, during or after hours. This excludes activities for which Lee Kelly charges a fee.

We do not allow offers of money in any form to be accepted. All gifts and benefits received become the property of Lee Kelly and its use or disposal is the responsibility of Lee Kelly, not the staff member. This can take many forms, including donation to the social club or a charity. In some circumstances, staff may be allowed to keep a gift.

All gifts or benefits received must be notified to Lee Kelly's office manager. Our staff are asked to exercise judgment when offered gifts or favours by any person or organisation. Our staff understand that accepting an offer of gifts or favours, even of a token kind, can appear to compromise our professional integrity.

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Prior to accepting a gift or benefit from clients or any stakeholder, our staff must ask themselves these questions:

- Could I give the impression to the client or to the general public that I am favouring this person above others?
- If I accept such hospitality or gift will it put me, or even appear to put me, in this person's debt?

If the answer to either of these questions is "yes", the offer must be refused. If in doubt, our staff are asked to refer the offer to the Lee Kelly office manager or managing director for consideration.

These guidelines also apply in our dealings with any of Lee Kelly's suppliers and consultants.

Acceptable gifts and benefits include:

- Unsolicited gifts or benefits of nominal value, or of an inconsequential or trivial nature, where there is no real or apparent conflict of interest. For example marketing items such as corporate mementos, pens, mugs, notepads and key rings.
- Modest hospitality simultaneously available to colleagues such as tea, coffee and a modest lunch. In some cases, this can be regarded as a common courtesy, as opposed to a gift or benefit.
- Prizes of modest magnitude won as a result of conducting business.
- Invitations to local sporting or cultural functions where our presence does not imply an inappropriately close or preferred relationship with the person or company who invited you.

Any acceptable gift or benefit must be notified to the Lee Kelly office manager within two weeks of receipt. The office manager records these gifts in a gift registry to ensure a record of propriety.

Gifts and benefits that cannot be accepted include:

- Tickets to sporting events or other entertainment
- Sports team sponsorship by a supplier
- Free or discounted products for personal use such as use of a gym, holiday accommodation or personal travel
- Expensive alcoholic beverages
- Club memberships or magazine subscriptions that have only been made available to one person.
- Any gift, benefit or hospitality during any period of contract negotiation.

Our process for reporting corrupt behaviour

All Lee Kelly staff and contractors are fully conversant with our anti-corruption policies and process, as it forms one of the central topics in our staff induction program. This ensures that should corrupt behaviour be identified, they are well equipped to put the following process into action.

Where corrupt behaviour has been identified, the Lee Kelly office manager is advised. The office manager then meets with the accused or relevant staff within 24 hours to discuss the accusation or issue. If the staff are not at work it must occur as soon as they return but this must be within five days.

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The Lee Kelly staff accused of corrupt conduct have two business days to respond to the accusation. The staff member must meet with the Lee Kelly managing director to discuss the accusation and respond to the allegation. Lee Kelly can instigate a formal investigation, either internally by a senior independent manager or by an external consultant. The investigator has five working days to complete the investigation and make recommendations.

Depending on the investigation's outcome and recommendations, the following actions may occur:

1. The matter is referred to police.
2. The employee or subcontractor is terminated
3. The employee or subcontractor is cleared of the allegation.

All parties are advised of the investigation's findings and given a copy of the report.

Our commitment

The Lee Kelly anticorruption policy is a fundamental part of our business. It must be adhered to by all employees and subcontractors at all times.



Managing Director: _____ **Date:** 29 January 2015

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