

	Fraud Reporting Guidelines		<department></department>	
RGF Staffing	March 2022		3	
Target audience:	All Staff			
Contact person:	Chris Riorden, Legal			
Policy owner:	Mark Graham, Chief People Officer			
Related Standards:		Related Guidance documents:		
• Nil		• Nil		
Effective date:	Updated as per:	Modification:		
3 March 2022	September 2021	Updated Template		
Approved by:		Approved on:		
Chris Riorden, General Counsel		1 March 2022		

Group Policy compliance

Primary responsibility for adherence to this Policy resides with the SBU Unit CEO. Local laws and regulations supersede this policy. Should this policy be found to be in contradiction with such regulations, it is the CEO's responsibility to immediately inform the General Counsel of this matter. This policy supersedes all local company policies. Should a local policy contradict this policy, it is the CEO's responsibility to align the local policy with this policy.



I. PURPOSE OF THE POLICY

Fraud is a criminal act and is taken most seriously at RGF Staffing APEJ. These guidelines set out the procedure to be followed in the instance of employee and/or contractor-initiated fraud. Examples include supplying false timesheets or invoices, 'inventing' a false employee, and use of CMG or client orders to obtain goods, services, or monies for personal use.

There are very serious consequences for anyone who commits or is involved in a fraud, including recovery actions, fines, termination of employment or engagement and, potentially, imprisonment.

In relation to any other instances of suspected fraud, contact your manager (in the first instance) for direction, and if unsure, contact P&C or Legal for guidance, or otherwise action in accordance with CMG's Whistleblower Policy.

II. SCOPE OF THE POLICY

This Policy applies to all employees of, and third parties acting for or on behalf of RGF Staffing APEJ, including Entities over which RGF Staffing APEJ has control or which are trading under the name of RGF Staffing APEJ.

III. COMPULSORY ITEMS

Understanding the steps to report a fraud issue.

IV. GOLDEN RULES

Escalate fraud or suspected fraud to your manager immediately.

V. GLOSSARY		
Official term	Explanation	



Fraud issue, or suspected fraud issue, identified by RGF Staffing APEJ staff. Step 1: RGF Staffing APEJ Person to escalate fraud issue to their manager Step 2: Manager sends details of fraud issue to their P&C representative P&C and Manager work to obtain facts and allegations regarding fraud issue Is the fraud issue a one-off, single incident under \$15k? Yes Fraud issue is serious, repeated, or ongoing, or the Fraud issue is a one-off, single incident, or the impact impact value is over \$15k value is under \$15k P&C to advise Legal of fraud issue, Legal to advise on best P&C and manager to investigate fraud issue including any way to proceed with investigation process (cc Payroll) preliminary process with employee or contractor (cc Legal Counsel & Payroll) If applicable, client is advised of progress of investigation by Manager, P&C and Legal input P&C and Manager conclude investigation and propose Legal, with P&C and Manager, to provide assistance with investigation findings and propose recommended actions recommended actions (cc Legal Counsel & Payroll) If recommended by Legal, fraud issue referred to police. Recommended disciplinary process to be finalised, as determined by P&C Manager to finalise any client communication with P&C and Legal input. P&C and Manager to engage Payroll and/or Credit Team (as required) regarding cost recovery process. Payroll and/or Credit Team commence cost recovery or debt write off in accordance with Credit Policy/Delegated Authority **Policy** Relevant business stakeholders to conduct post incident review, and implement preventative action procedures