

Subject: Reporting Fraud & Corruption Policy

**Effective: 22 February 2010
(Supersedes all previous related policies)**

Purpose

- To provide employees and contractors with the procedure for reporting about Fraud or Corruption.

Scope

- This policy applies to all employees and contractors at Sydney Ports Corporation.

Principles

Fraud

Is defined as “Dishonest activity causing actual or potential financial loss to any person or entity including theft of monies or other property by employees or persons external to the Entity and where deception is used at the time, immediately before or immediately following the activity”.

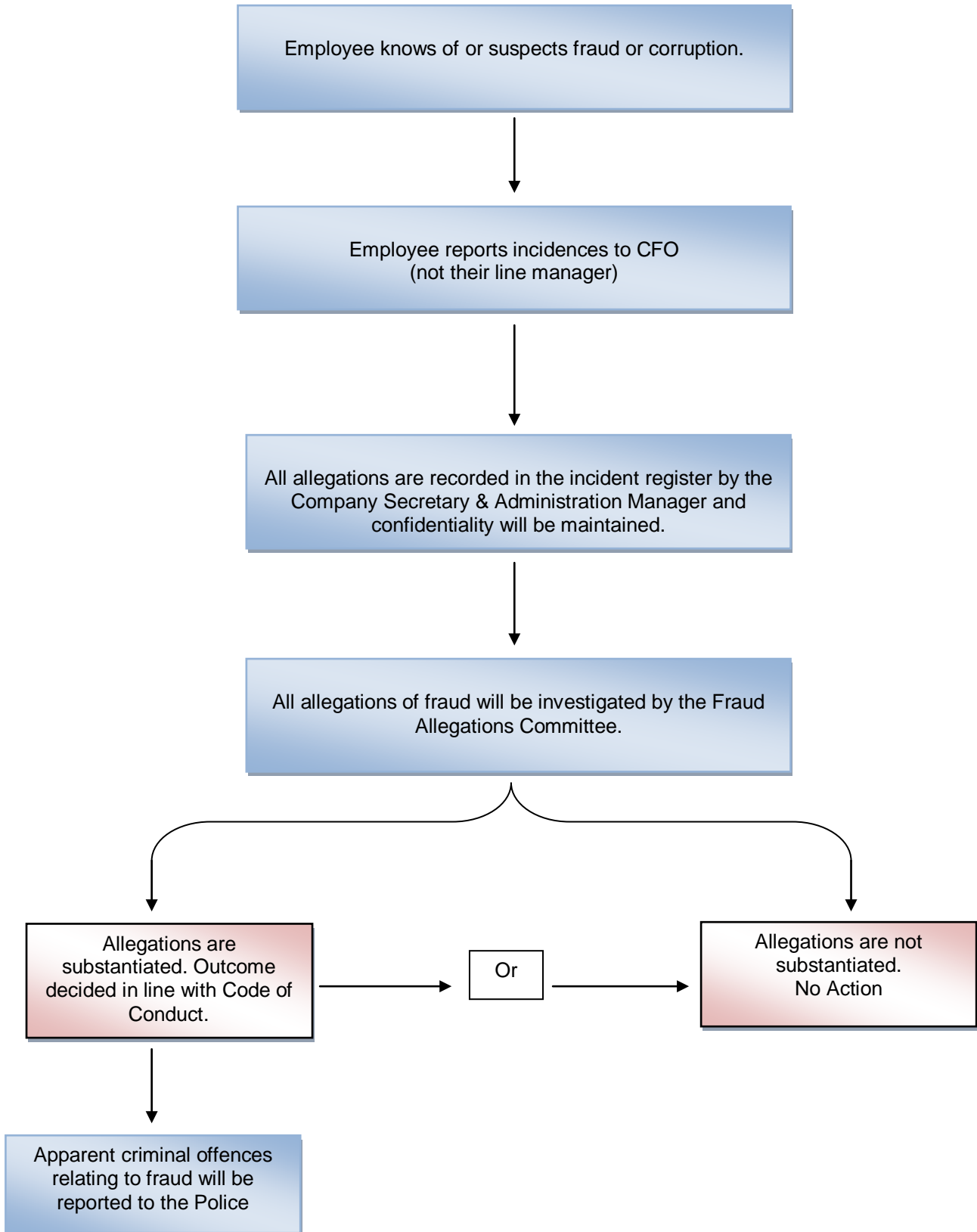
Corruption

Is defined in as “Dishonest activity in which a director, executive, manager, employee or contractor of an entity acts contrary to the interests of the entity and abuses his/her position of trust in order to achieve some personal gain or advantage for him or herself or for another person. Corruption can also involve corrupt conduct by the entity or a person purporting to act of behalf of and in the interests of the entity in order to secure some form of improper advantage for the entity either directly or indirectly”.

- i). official misconduct (including breach of trust, fraud in office, oppression and extortion);
- ii). bribery;
- iii). blackmail;
- iv). obtaining or offering secret commissions;
- v). fraud;
- vi). perverting the course of justice;
- vii). election bribery, funding expenses or fraud;
- viii). tax or revenue evasion;
- ix). illegal gambling or drug dealings;
- x). obtaining financial benefit by vice engaged in by others;
- xi). bankruptcy and company violations;
- xii). violence;
- xiii). matters of a similar nature to those listed above;
- xiv). any conspiracy or attempt in relation to any of the above.”

Procedure

The system for reporting disclosures is shown diagrammatically below:



Further Information

Protected Disclosures Policy

Policy Owner

EGM Human Resources