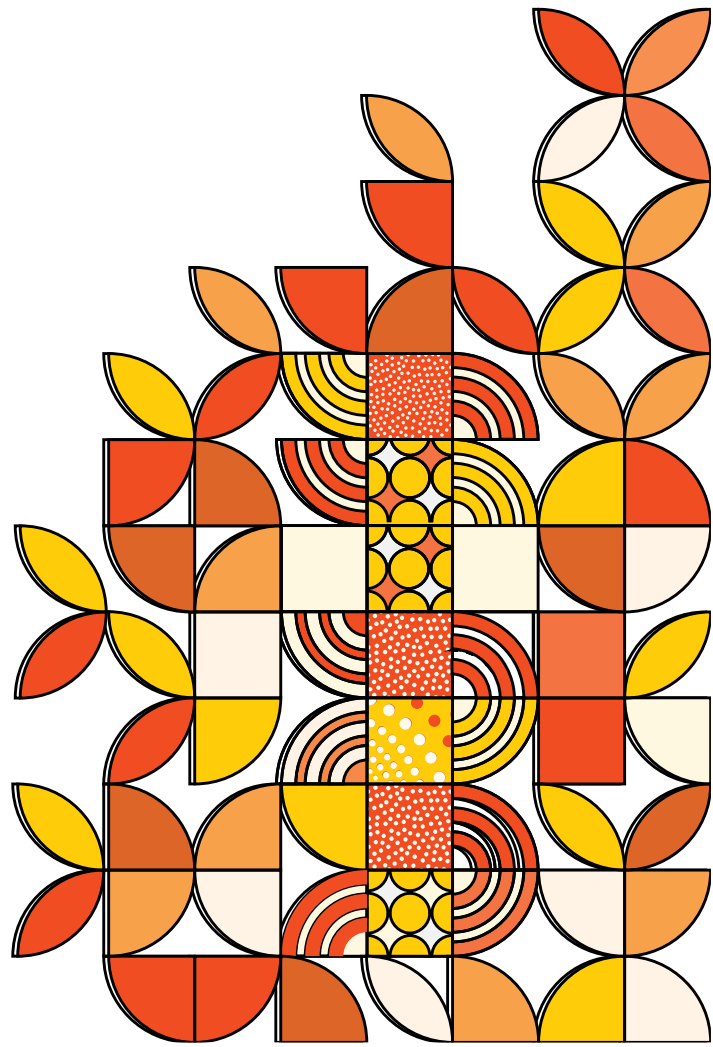


Fraud and Corruption Prevention and Control Policy



SECTION 1

Purpose

1. The purposes of this Policy are to:
 - 1.1 Reaffirm that IHM does not tolerate any form of fraud, improper conduct, and corruption.
 - 1.2 Promote a culture of honesty, integrity, and professionalism throughout IHM.
 - 1.3 Establish procedures to prevent, detect, and control fraudulent, improper, and corrupt activities.
 - 1.4 Provide comprehensive guidance on identifying and appropriately managing fraud and corruption.
 - 1.5 Mandate the timely reporting of any fraud or corrupt conduct by all stakeholders.

Scope

2. This Policy applies to:
 - 2.1 All officers, employees, students, and associates of IHM, including contractors, consultants, members of the Board of Directors and its committees, and volunteers; and
 - 2.2 All teaching, learning, research, engagement, and support activities of IHM.
3. Subject to any significant instance of fraud or corruption that must be investigated or reported under this Policy, this Policy does not apply to alleged student, academic or research misconduct, which are governed by separate policies, such as the Research Management Policy, the Academic Honesty and Integrity Policy, and the Student Misconduct Policy.

Suit Documents

4. This Policy is linked to the following suit document:
 - 4.1 The Whistleblower (Fraud and Corruption Control) Procedure.

Authority

5. This Policy is made in fulfilment of IHM's obligations as a private sector institute of higher education under relevant regulatory requirements, including the requirements of the *Corporations Act 2001* (Cth).

Compliance

6. This Policy supports compliance with the:
 - 6.1 *Crimes Act 1958* (Vic);
 - 6.2 *Corporations Act 2001* (Cth);
 - 6.3 *Fair Work Act 2009* (Cth);
 - 6.4 Relevant criminal legislation of States and Territories where IHM operates;
 - 6.5 IHM policies and procedures, including those enumerated at the end of this document; and
 - 6.6 Relevant legislative and regulatory standards and codes to which IHM is subject.

Definitions

7. For the purposes of this Policy,

7.1 **Fraud** includes but is not limited to dishonestly obtaining or attempting to obtain a benefit or advantage for any person or dishonestly causing or attempting to cause a loss by deception or other means to IHM. Examples of fraud include falsifying documents, taking or giving/offering a bribe, concealing a conflict of interest, dishonestly releasing information, and so on.

7.2 **Improper conduct** is unethical or illegal conduct by an individual that is inconsistent with property, business ethics, professional standards, or legal rules and may include corrupt conduct, misconduct, and unsatisfactory conduct.

7.3 **Corruption** is a dishonest activity in which a person acts contrary to the interests of IHM and abuses their position of trust or authority to achieve any personal gain or advantage for themselves or for another person or entity. The concept of a 'person' may include IHM as a corporate entity or any of its governing bodies/committees if IHM or its bodies/committees act to secure any improper advantage for IHM directly or indirectly. Examples of corruption include, but are not limited to, theft of money or other property of IHM, or misuse of IHM resources, and taking or offering bribes to someone inside or external to IHM.

8. For definitions of other terms used in this Policy, refer to IHM's [Glossary of Terms](#).

SECTION 2

Policy

Principles and Standards

9. All members of IHM — students, staff members, board directors, contractors, and visitors — must:

9.1 Comply with all IHM policies, procedures, codes, and guidelines as well as relevant legislation, regulations, instructions, guidelines and codes of the Commonwealth and the State where IHM operates.

9.2 Comply with relevant terms and conditions of employment and terms of reference of the relevant committee or body at IHM.

9.3 Understand this Policy and undertake relevant compulsory training on this Policy and its suite document(s).

Expectations and the Duty of Care

10. In the discharge of their duties and responsibilities, all members of IHM, including students, employees, and members of any governing body or committee, must:

- 10.1 Endeavour to prevent unacceptable risks to resources, operation, and reputation of IHM.
- 10.2 Act diligently and honestly, exercise due care, and apply required skills.
- 10.3 Observe the highest standards of integrity, especially in financial matters.
- 10.4 Must declare any potential, real, perceived or presumed conflict of interest.

Prevention and Control Framework

11. IHM has the responsibility to put in place and implement robust risk management mechanisms, including policies, procedures, risk assessments, internal controls, and independent audits to prevent fraud and corruption, ensuring their regular evaluation for effectiveness.
12. IHM Board of Directors and the Audit and Risk Management Committee have overall responsibility for fraud and corruption control by establishing a prevention and control framework at IHM.

Reporting

13. All IHM staff, associates and students who become aware of suspected fraud or corruption under this Policy must promptly report such incidents in accordance with the Whistleblower (Fraud and Corruption Control) Procedure and that IHM may report incidents under this Policy to relevant external authorities, including the Tertiary Education Quality and Standards Agency or Police.
14. A person acting under Clause 13 must ensure that evidence that may be valuable for an investigation is not compromised.
15. All IHM staff, associates and students acting under this Policy or the Suite Document(s) should be aware that reports made in good faith will be supported and protected, while any malicious, vexatious, or frivolous reports or complaints may lead to disciplinary action.

Response

16. Any fraud or corruption against IHM constitutes a serious offence under the law. IHM will fully investigate any such allegations in accordance with the Whistleblower (Fraud and Corruption Control) Procedure if a preliminary assessment of concerns about fraud or corruption requires a full investigation.
17. IHM will pursue a rigorous process to respond to any fraud, improper conduct, or corruption detected under this Policy and initiate disciplinary actions or a civil process to recover losses in accordance with the Whistleblower (Fraud and Corruption Control) Procedure.

Responsibility

18. In addition to the Board of Directors and the Audit and Risk Management Committee as mentioned in Clause 12 and the implementing officers mentioned in Section 3, the following officers have responsibility for the implementation of respective applicable aspects of this Policy:
 - 18.1 Chief Financial Officer.
 - 18.2 Chief Operating Officer.

18.3 Heads of IHM Departments.

18.4 Director, Audit and Risk.

18.5 Director, Quality Management.

18.6 Risk Manager.

18.7 Company Secretary.

18.8 Associate Dean, Governance (or the equivalent).

18.9 Any other officer notified by the Chief Executive Officer.

Non-compliance

19. Non-compliance with IHM policies and procedures is considered a breach of the (Staff) Code of Conduct and Ethics, Student Code of Conduct, or the Student Misconduct Policy, as applicable, and is treated seriously.

20. Complaints may be raised, and reports of concerns about non-compliance will be dealt with in accordance with the Staff Complaints and Grievances Procedure, Academic Honesty and Integrity Procedure, Student Misconduct Procedures, or any other procedures as applicable.

SECTION 3

Associated Information

Related Internal Documents	<ul style="list-style-type: none"> Whistleblower (Fraud and Corruption Control) Procedure (Staff) Code of Conduct and Ethics Academic Honesty and Integrity Policy and Procedure Performance Management Policy and Procedure Research Management Policy and Procedure Risk Management and Quality Assurance Policy and Procedure Student Misconduct Policy and Procedure
Related External Legislation, Standards and Codes	<ul style="list-style-type: none"> <i>Tertiary Education and Quality Standards Agency Act 2011</i> Higher Education Standards Framework (Threshold Standards) 2021, Domain 6 (Governance and Accountability) <i>Crimes Act 1958</i> (Vic) <i>Crimes Act 1900</i> (NSW) <i>Criminal Code Act 1899</i> (Qld) <i>Criminal Code Act Compilation Act 1913</i> (WA) <i>Taxation Administration Act 1953</i> (Cth) <i>Corporations Act 2001</i> (Cth), especially Part 9.4AAA
Date Approved	26/11/2024
Date of Effect	27/11/2024
Date of Next Review	26/11/2027
Approval Authority	Board of Directors
Recommended by	Audit and Risk Management Committee
Responsibility for implementation	Associate Dean, Governance (or the equivalent) Director, Audit and Risk (or the equivalent)

Document Custodian	Company Secretary
IHM Document ID	IHM-FCPCP1-2.0

Change History

Version Control		Version 2.0
Change Summary	Date	Amendment Details (brief description)
Version 1.0	17/02/2021	The first version was created.
Version 1.1	15/11/2022	Added The <i>National Anti-Corruption Commission Act 2022</i> (Cth).
Version 2.0	26/11/2024	The new policy has been developed and approved to align with auditors' recommendations and the <i>Corporations Act 2001</i> (Cth). The previous policy has been archived.