



# Anti-Money Laundering and Terrorism Policy Qantas Cabin Crew Team Limited (ACN 664 428 997)

**Effective Date: 25 June 2023**

In this Policy, 'us' 'we' 'our' or 'QCCT' means Qantas Cabin Crew Team Limited (ACN 664 428 997) and its wholly owned subsidiaries from time to time, if any.

## 1. Statement of Purpose

- 1.1 This Policy presents the position taken by QCCT in respect of anti-money laundering and terrorism.
- 1.2 QCCT is committed to ensuring that it complies with all applicable laws and manages, and mitigates any risk of fraud and dishonest behavior.
- 1.3 The purpose of this Policy is to promote awareness and the prevention of money laundering or the support of terrorism or organised crime. Specifically, this Policy seeks to prevent, detect and deter facilitation of and the unknowing engagement in money laundering or the support of terrorist or criminal groups or organisations or individuals associated with terrorism or organised crime. This Policy has been established to ensure that QCCT implements controls so as to fully comply with all applicable anti-money laundering and anti-terrorist regulations, and to ensure that QCCT's business is conducted in a socially responsible manner.
- 1.4 QCCT has a culture based on mutual respect and honesty and has policies in place to ensure that we operate in a lawful manner with our colleagues and clients. Ongoing training is provided to all Personnel by a member of the QCCT Executive Committee, in relation to applicable rules of professional conduct and ethics.

## 2. Policy statement

- 2.1 It is our policy to conduct all of our business in an honest and ethical manner. We take a zero tolerance approach to money laundering. We are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate and implementing and enforcing effective systems to counter the risk of money laundering.
- 2.2 We will uphold all laws relevant to countering the transfer of funds in all the jurisdictions in which we operate. We are, of course, bound by the laws of Australia, including *Anti-Money Laundering*

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*and Counter Terrorism Financing Act 2006 (Cth), the Commonwealth Criminal Code and the Corporations Act 2001 (Cth) in respect of our conduct both at home and overseas.*

**2.3** We take our legal responsibilities very seriously.

### **3. Definitions**

In this Policy, unless the context clearly indicates otherwise:

**Administration Manager** means the person appointed to the QCCT Executive Committee with the responsibility for all of QCCT's administrative matters.

**Board** means the board of directors.

**Chairperson** means the chair of the Board and the QCCT Executive Committee.

**Finance Manager** means the person appointed to the QCCT Executive Committee with the responsibility for QCCT's finance and treasury functions.

**Personnel** means all of our directors, officers, employees, agents, sub-contractors, volunteers, interns and participants (whether permanent, fixed-term or temporary), both in Australia and internationally.

**QCCT Executive Committee** means the executive committee of QCCT appointed from time to time, and includes (but is not limited to) the Chairperson, the Finance Manager and the Administration Manager.

### **4. Application**

**4.1** In this Policy, third party means any individual or organisation you come into contact with during the course of your work for us, and includes actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies, including their advisers, representatives and officials, politicians and political parties.

**4.2** This Policy applies to all Personnel (also referred to in this Policy as "**you**").

**4.3** This Policy covers:

- (a) money laundering;
- (b) fraud;
- (c) terrorism; and
- (d) organised crime.

### **5. Money laundering**

Money laundering is the process of hiding or disguising the source of illegally obtained funds to make them appear legitimate - for example, by filtering them through the financial system. Money laundering is intended to reduce the risk of detection and confiscation by authorities and

is just as serious as the criminal activity behind it. Prevention of money laundering can help to reduce crime.

## **6. Terrorism**

Terrorism is the act, or threat of action, where the action causes certain defined forms of harm or interference and the action is done or the threat is made with the intention of advancing a political, religious or ideological cause. An individual or group associated with terrorism or suspected to be involved in terrorism related activities will include those listed by Commonwealth, State or Territory government authorities and international government intelligence agencies.

## **7. Organised Crime**

Organised crime includes a conspiratorial enterprise engaged in illegal activities as a means of generating income.

## **8. Fraud**

Dishonestly obtaining a benefit, or causing a loss, by deception or other means.

## **9. Risk mitigation and Personnel responsibilities**

- 9.1** All Personnel must read and comply with this Policy, including in respect of all dealings with third parties for and on behalf of QCCT.
- 9.2** The prevention, detection and reporting of money laundering and terrorist or criminal activities are the responsibility of all those working for us or under our control. All Personnel are required to avoid any activity that might lead to, or suggest, a breach of this Policy.
- 9.3** We have policies in place to rigorously monitor financial transactions, as is outlined in our Control of Funds Policy. We employ an effective financial management program that allows us to record, track and reconcile fund raising and donation revenue with funds deployed in various projects and programs. Regular project and program budgets are prepared and tracked closely to detect any variance in expenditure. Budget reviews are undertaken regularly. All expenditure has dual authorisation.
- 9.4** QCCT also monitors the design, implementation, management and results of our overseas projects and programs. We believe that monitoring and evaluation is a crucial part of determining the success of our projects and partners, and a key part of our measures of success is ensuring fraud and money laundering does not occur. This includes:
  - (a) A process where QCCT works with the Partner to implement a program or project with proper due diligence, including the project plan and project budget.
  - (b) A process during and after the project where QCCT conducts monitoring discussions with the project leader and our partner organisation. This monitoring includes internal monitoring from QCCT representatives on-site, as well as independent third party

monitoring on-site. The frequency of the monitoring varies according to the type of project undertaken.

**9.5** QCCT and its Personnel are required to ensure that QCCT:

- (a) know the persons/organisations that are being directly assisted by them;
- (b) make sure that people/organisations being directly assisted are not on either of the lists published by the anti-terrorism and security services in all countries in which QCCT operates before assistance is provided and ensure that appropriate security updates

provided by various authorities via their websites or other forms of communication is taken into account;

- (c) make sure that directly funded persons/organisations are aware of and are obliged to comply with these laws, and that they in turn are obliged to make sure that their distribution of the funds or support is made on the same basis and strict criteria;
- (d) apply caution where:
  - (i) prescribed organisations or individuals are known to be in the area; and/or
  - (ii) the scale of financial or material support transaction is such that it could potentially provide significant support to a proscribed individual or organisation; and
  - (iii) advise the Board, immediately if it becomes aware of any breach of these guidelines by any such organisation or group.

**9.6** All Personnel must use best endeavours at all times to ensure:

- (a) funds are not provided directly or indirectly to individuals or organisations associated with terrorism and/or organised crime;
- (b) all individuals or organisations involved in implementing/facilitating projects on behalf of QCCT are not associated directly or indirectly to organisations or individuals associated with terrorism and/or organised crime;
- (c) all activities, individuals /organisations involved and the general practice and functionality of QCCT adhere and comply with the relevant laws, regulations and policies of Australia and the countries in which the projects and programs are located; and
- (d) any breach of this Policy will be immediately brought to the attention of the Commonwealth, State or Territory authorities, as appropriate, or to the attention of the appropriate authorities in the country in which the project or program is located.

**9.7** Without limitation, Personnel are required to be alert and report:

- (a) complex payment requests;
- (b) unusual transfer of funds;
- (c) requests for cash payments or payments to or receipts from unknown third parties;
- (d) unusually high payments to agents or other contractors;
- (e) proposed foreign partners owned or recommended by Government officials or relatives or insisting on sole control of Government approvals;
- (f) lack of transparency in foreign expense or accounting records;
- (g) evidence that a portion or all of a consultancy or other payment has been passed on as a bribe or otherwise in contravention of this Policy; and
- (h) any other suspicious circumstances or conduct proposed by others which a Personnel is concerned may breach this Policy.

**9.8** You must notify the Finance Manager and/or the Chairperson as soon as possible if you believe or suspect that a conflict with or breach of this Policy has occurred, or may occur in the future.

**9.9** Any Personnel who breaches this Policy will face disciplinary action which could result in dismissal.

## **10. Record-keeping**

**10.1** We keep financial records and have appropriate internal controls in place which will evidence the business reason for transfer of funds and making payments to third parties.

**10.2** You must keep detailed records of any body corporate, organisation or person to whom funds are transferred or paid. Where appropriate, you must undertake appropriate due diligence inquiries in respect of such payees.

**10.3** You must ensure all expense claims relating to hospitality, gifts or expenses incurred to third parties are submitted in accordance with our expenses policy and specifically record the reason for the expenditure.

**10.4** Without limitation, we will:

- (a) investigate all reported cases of alleged, suspected or detected fraud and/or money laundering;
- (b) report any alleged, suspected or detected fraud and or money laundering to the appropriate authorities and cooperate with them in order to prosecute or apply other appropriate sanctions against those who have committed fraud and /or money laundering;
- (c) seek the recovery of misappropriated funds or assets wherever possible; and
- (d) where the funds defrauded relate to institutional donors, such as a government agency, the donor should be informed in accordance with contractual requirements.

## **11. How to raise a concern**

**11.1** You are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. If you are unsure whether a particular act constitutes money laundering or may be associated with terrorist or criminal activities, or if you have any other queries or concerns, these should be raised with the Finance Manager and/or the Chairperson.

**11.2** Further:

- (a) QCCT aims to create a culture that encourages fraud and money laundering detection, ensures that whistle-blowers are protected, and investigates allegations in a rigorous and impartial manner. Training is provided for relevant Personnel regarding fraud and money laundering detection.
- (b) Personnel must report allegations of fraud and money laundering while our Personnel are committed to upholding and adhering to QCCT principles and guidelines that are intended to identify and prevent fraud and money laundering as indicated above.
- (c) We are committed to ensuring no negative outcomes occur for whistle-blowers acting in good faith.
- (d) Investigations must be completed in a confidential, prompt and professional manner according to established guidelines. If allegations of fraud and money laundering are

proved to be correct, QCCT is committed to taking disciplinary action in a transparent and fair manner.

## **12. What to do if you become aware of money laundering, terrorist or criminal activities**

It is important that you tell the Finance Manager and/or the Chairperson as soon as possible, if you become aware of money laundering, terrorist or criminal activities, are asked to participate or assist same, suspect that this may happen in the future, or believe that you may be requested to participate in another form of unlawful activity.

## **13. Training and communication**

Training on this Policy forms part of the induction process for all new Personnel. Our zero-tolerance approach to money laundering, terrorism and criminal activities should be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and as appropriate during the business relationship.

## **14. Complaint mechanisms**

All complaints involving any actual or potential breach of this Policy are to be reported in accordance with the Complaints Handling Policy.

## **15. Risk mitigation, responsibility, monitoring and review**

- 15.1** The Board has overall responsibility for ensuring this Policy complies with our legal and ethical obligations and that all Personnel comply with it.
- 15.2** The QCCT Executive Committee collectively have the day-to-day responsibility for implementing this Policy, and for monitoring its use and effectiveness and dealing with any queries on its interpretation.
- 15.3** All Personnel are to be trained upon induction and at regular intervals in respect of this Policy. Personnel may be required to sign a form to confirm they have read and understood this Policy.



This Policy is intended to be incorporated by reference in any terms of engagement between QCCT and Personnel.

- 15.4** All Personnel are responsible for the success of this Policy and should ensure they use it to disclose any suspected danger or wrongdoing.
- 15.5** Personnel are invited to comment on this Policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to the Chairperson.

## **16. Access to this Policy**

- 16.1** It is important to QCCT that this Policy is available to all of its stakeholders including beneficiaries of our programs, donors and supporters. QCCT therefore endeavours to ensure that access to this Policy is made as easy as possible.
- 16.2** This Policy is available for download from our website.
- 16.3** It is the responsibility of all Personnel to ensure that all relevant stakeholders in Australia and internationally, are informed of the existence and implementation of this Policy in any way they consider to be culturally appropriate.

## **17. Policy review**

- 17.1** This Policy may be amended at any time by the Board in its absolute discretion.
- 17.2** It is intended this Policy may be reviewed on an annual basis.
- 17.3** Any annual review of this Policy may include collection and review of all relevant documents of QCCT (in Australia and internationally), including board minutes, training materials, reports and other associated documents in respect of this Policy.