



FRAUD POLICY

Purpose

The purpose and objective of this policy is to:

- provide high level guidance for the prevention and detection of fraud, and LCAC's response to fraud;
- identify who is responsible for taking action in cases of actual or suspected fraud; and
- set out LCAC's reporting and investigation procedures in relation to fraud.

Response to fraud

LCAC has a zero tolerance approach to fraud. All instances of suspected fraud or corruption must be reported and investigated as set out in this policy.

Any proven incidents of fraud will be considered to be serious misconduct, and may be reported to the appropriate authorities.

Scope of Policy

This policy applies to any fraud, or suspected fraud, involving Executive Committee members, employees, consultants, vendors, contractors, outside agencies doing business with LCAC, and/or any other parties with an actual or potential business relationship with LCAC.

What is Fraud?

Fraud means a dishonest act or omission committed in order to obtain or potentially obtain an unfair, unjustified or unlawful gain for any person. Fraud can include, but is not limited to:

- Knowingly providing false, incomplete or misleading information to LCAC for unfair, unjustified or unlawful gain.
- Theft of cash or property (including intellectual property).
- Forgery or alteration of documentation, computer files, or data, intentional misrepresentation of financial or personal information.
- Misappropriation of funds, securities, supplies, or other property.
- Impropriety in the handling or reporting of money or financial transactions.
- Misuse of insider knowledge of LCAC activities.
- Disclosing confidential and proprietary information to outside parties.
- Accepting or seeking anything of material value from contractors, vendors or persons providing services/materials to LCAC.
- Destruction, removal or inappropriate use of records, furniture, fixtures, and equipment; and/or
- Any similar or related dishonest conduct.

Responsibility

The President is responsible for facilitating the detection and prevention of fraud.

All club members will ensure they are:

- familiar with the types of fraud that might occur within their area of responsibility;
- alive to the risks and indications of fraud; and
- familiar with the procedures to follow if fraud is suspected or detected.

Everyone within LCAC is responsible for maintaining the highest level of ethical behaviour and must report any actual or suspected fraud using the appropriate reporting channels (see “**Reporting Procedures**” below).

Reporting Procedures

Club Members are not to take steps to investigate actual or suspected fraud themselves (unless they are the individuals identified as having that responsibility in this policy). Anyone who is aware or who suspects fraud must promptly report such activity to any of the following:

- Club President
- Club Secretary

Reports relating to the Club President should be referred to the Club Secretary.

All reports of suspected or actual fraud must be treated seriously and with great care, and forwarded to the Club President for investigation (see “**Investigations**” below). If the Club President is the subject of the report, the Club Secretary will appoint an appropriate person to conduct the investigation.

The person who reports actual or suspected fraud may remain anonymous, and can be protected by the Protected Disclosures Act 2000.

All reported and investigated allegations are to be reported to the Executive Committee as described further below.

Investigations

The Club President has the primary responsibility for the investigation of all actual or suspected fraud (unless, as noted above, the Club President is potentially implicated).

The Club President will maintain a record of all reports of actual or suspected fraud, including a summary of the process and outcome of each fraud investigation.

Depending on the nature and seriousness of the actual or suspected fraud, an investigation may require consultation or engagement with other persons, such as technical legal experts or forensic accountants, auditors, and external agencies.

Any data, record, or property belonging to LCAC may be examined as part of any investigation process, in a manner that is consistent with the Privacy Act 2020.

Employees and Club Members must cooperate with and not impede any investigation of actual or suspected fraud.

Any investigations will be conducted without regard to the relevant individuals' length of membership, position/title, or relationship to LCAC.

In the event that fraud is substantiated, every effort must be made to preserve and protect all relevant evidence that may be required to support internal disciplinary action and, where appropriate, criminal prosecution. The Club President will report substantiated reports to the Executive Committee.

The decision whether to report actual or suspected fraud to the appropriate law enforcement and/or regulatory agencies will be made by the Club President and the Club Secretary. If one or both of those individuals is implicated, the decision will be made by the Executive Committee.

Approved December 2024.