

Fraud Policy

Policy owner: General Manager Corporate Services **Policy approved by:** ENZ Board on 14 June 2023

Applies from: 1 July 2023 to 30 June 2026

Applies to: Staff, Contractors, and Board members

Purpose

To set out ENZ's policy on fraud, specifically:

- minimising the potential of employee fraud.
- detecting fraud
- · dealing with suspected fraud

Background

ENZ values the integrity of its employees and relies on them to meet the standards of behaviour set out in the 'Code of Conduct.' Fraudulent behaviour by an employee is unacceptable and will not be tolerated. ENZ will take all appropriate measures to deter fraud, carry out regular reviews to detect fraud and if fraud is suspected deal with it accordingly, through the 'Code of Conduct' and via appropriate law enforcement agencies.

Definitions

Fraud

Fraud is an intentional and dishonest act, involving deception or misrepresentation by a person, to obtain an advantage for themselves or another person. Examples of fraud in the workplace are:

- authorising or receiving payment for goods not delivered, services not performed, or time not worked.
- fabrication, falsification or alteration of data, financial information, or personal information
- misappropriation of funds
- misappropriation or unauthorised use of ENZ property
- soliciting or receiving gifts or other gratuities to perform an official duty or omit to perform an official duty.
- bribery

Employee

For the purpose of this policy the term 'employee' covers permanent, fixed-term and casual staff, Board members, contractors and secondees.



Minimising the potential for employee fraud

Regular reviews will be undertaken to identify, mitigate and manage risks.

ENZ will operate on the 'separation of duties' principle for all transactions and activities that may be susceptible to fraud e.g. cash handling, issuing travel advances, processing expense claims etc.

ENZ will maintain 'delegations' that are appropriate to the competency of every role.

ENZ will actively and regularly maintain, review, and update all financial, human resource and information and communications technology (ICT) policies and procedures.

ENZ will operate and maintain appropriate, robust financial management and human resource information systems.

Detecting fraud

ENZ will undertake regular reviews of transactions and activities that may be susceptible to fraud.

ENZ will undertake regular reviews of the transactions and activities of business units or separate offices.

ENZ actively encourages employees to report any suspicion of fraud, theft, or corruption.

Dealing with fraud

Any suspected fraud will be regarded as a potential breach of ENZ's 'Code of Conduct' and treated accordingly.

Every case of suspected fraud will be investigated in accordance with procedures set out in ENZ's Fraud Response Procedure which is a procedure document to enable ENZ to deal with an allegation of fraud in a systematic, efficient, fair, and effective manner.

Every case of suspected fraud will be reported to the appropriate law enforcement agency.

ENZ will immediately advise its appointed external auditor of any suspected fraud.

Money lost through fraud, theft or corruption will be recovered wherever possible and practicable.