

NO ROADS EXPEDITIONS FOUNDATION (AUST) LIMITED

SUSPICIOUS ACTIVITY POLICY

Introduction

The purpose of this policy of No Roads Expeditions Foundation (Aust) Limited ('**Charity**') is to ensure full and proper adherence to the:

- (a) laws of the Commonwealth of Australia, its State and Territories;
- (b) provisions of its constitution; and
- (c) terms of its policies, contracts and agreements,

by all individuals associated with the Charity.

Investigation

Any behaviour or activity that the Charity, its board, members or associated individuals reasonably suspect would be in breach of any law, custom, contract or agreement ('**Suspicious Activity**') will be investigated by an objective sub-committee of three officers of the Charity, appointed by the directors ('**Investigation**').

Outcome of Investigation

1. No breach

If an Investigation is conducted and the Suspicious Activity is reasonably deemed to not be a breach of any law, custom, contract or agreement, a report of the circumstances, processes and outcomes of the Investigation will be prepared and kept on record by the Charity.

2. Breach of civil law, custom, contract or agreement

If an Investigation is conducted and the Suspicious Activity is reasonably deemed to be a breach of any civil law, custom, contract or agreement, then the Charity will immediately:

- (a) send written notice to the party in breach, setting out the findings of its Investigation;
- (b) ensure that the party in breach immediately desists from any activity that may amount to further breach; and
- (c) if required by any legislation, regulation, guideline or policy, report the breach to a governing body or regulator.

3. Breach of criminal law

If an Investigation is conducted and the Suspicious Activity is reasonably deemed to be a breach of any criminal law, then the Charity will immediately contact the police.

Record keeping

The Charity will keep records of any matter referred to under points 1-3 of 'Outcome of Investigation' above.

Review of policy

This policy shall be reviewed by the board every two years as a minimum.

Adopted by the board of the Charity onof.....2018