

Fraud, bribery, foreign bribery and corruption policy

Purpose and scope

VISAENVOY PTY LTD has zero tolerance for fraud, bribery and corruption in any form. This policy applies to all employees, directors, officers, contractors, volunteers and interns, and to anyone acting on VisaEnvoy's behalf, in Australia and overseas.

Prohibited conduct

- Offering, promising, giving, soliciting or accepting a bribe, kickback, secret commission or any other improper inducement, directly or through a third party.
- Bribery of Australian or foreign public officials in any form, including facilitation payments, consistent with the Criminal Code Act 1995 (Cth). This is of particular importance in our work involving government agencies: no payment or benefit may ever be offered to influence a visa or immigration outcome.
- Fraud of any kind, including dishonestly obtaining a benefit, falsifying documents or records, or misusing VisaEnvoy or client funds or information.
- Money laundering or dealing with the proceeds of crime.

Gifts, hospitality and conflicts of interest

Modest, infrequent gifts or hospitality exchanged openly in the ordinary course of business are acceptable only where they could not be seen to influence a decision; anything more must be declined or approved by a Director. No gifts or hospitality may be offered to public officials. Actual, potential or perceived conflicts of interest must be disclosed to a Director as soon as they arise.

Records, third parties and suppliers

Accurate books and records are maintained for all transactions. Suppliers, sub-contractors and business partners are required to comply with equivalent standards under the VisaEnvoy Supplier Code of Conduct, and anti-corruption compliance is considered when engaging and reviewing them.

Reporting and consequences

Suspected fraud, bribery or corruption must be reported to a Director and may be reported under the VisaEnvoy Whistleblowing Policy, including anonymously, with protection from reprisal. Breaches of this policy will result in disciplinary action up to dismissal or termination of engagement, and referral to the relevant authorities.

Review

This policy is reviewed at least annually by a Director, is available on the VisaEnvoy website, and is covered in staff induction and periodic refreshers.

Name: Ian Armani

Position: Director - on behalf of
VisaEnvoy Pty Ltd

Signature:



Date: 15 July 2026

Review
date:

Annually