

Compliance Policy

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Purpose

The purpose of this policy is to detail how Activ remains compliant with all of the legislative, contractual and policy requirements associated with its activities.

The policy provides the context for the Compliance Framework which in turn provides guidelines and structures for all accountable persons under the policy.

Scope

This document applies to all Activ Staff, Employees, Contractors and Volunteers.

Policy Statement

- 1.1 The Board and senior management of Activ are committed to ensuring the organisation meets its Compliance Obligations.
- 1.2 Compliance is concerned with not only externally imposed laws, regulations, codes and standards, but also with internal organisation standards, codes of conduct and ethics, and adoption of industry best practice.
- 1.3 Compliance and safety are defined at the highest level within Activ as “Must Haves”. Where appropriate, key compliance objectives will be incorporated into the strategic and operational planning processes.
- 1.4 A compliance framework is an important element of corporate governance and is intended to:
 - Promote a culture of compliance within Activ, highlighting its importance and connection to Activ’s values;
 - Foster continuous improvement in compliance processes, ensuring obligations are always met by establishing monitoring and reporting mechanisms that will assist in identifying instances of non-compliance and tracking remedial actions;
 - Maintain the reputation of Activ in the marketplace and to demonstrate its social and corporate responsibilities.
- 1.5 Activ’s Compliance Framework reflects Australian Standard AS 3806-2006 – Compliance Programs (AS 3806).
- 1.6 Activ’s compliance governance structure consists of:
 - a) Activ’s Board
 - i. the Compliance Policy
 - ii. CEODP – CEO Delegations Policy
 - iii. Audit & Risk Committee

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- b) Activ's Executive Team
 - i. The Compliance Framework
 - ii. Individual divisional compliance programs; and
- c) Supporting tools and processes
- d) Monitoring and reporting structures

Definitions

Accountability – the obligation of an individual to account for their activities, accept absolute responsibility for them, and to disclose the results in a transparent manner.

Compliance Obligation – a requirement under legislation with which Activ must comply.

Contractor– an individual who is employed directly by Activ for a defined period of time. This term differs from third party contractors.

Key Related Policies and Documents

- CEO Delegations Policy (AQuA: 2010)
- Board Charter (AQuA: 2022)
- Audit and Risk Committee Terms of Reference (AQuA: 985)
- RCAA Policy (AQuA: 304)
- RCAA Framework (AQuA: 431)
- Compliance Framework (AQuA: 2084)
- Corporate Governance Statement (AQuA: 2411)

Consultation Process

- Executive Officer
- Audit and Assurance Manager
- Leadership Team
- Audit & Risk Committee
- Activ Board