

# TISHER LINER FC LAW

## CHASDEI DAVID CHARITY FUND LTD SUSPICIOUS ACTIVITY POLICY

### Introduction

The purpose of this policy of Chasdei David Charity Fund Ltd. (CDCF) 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 CDCF.

### 1. Investigation

Any behaviour or activity that CDCF, 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 CDCF, appointed by the directors (**Investigation**).

### 2. 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 CDCF.

#### 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 CDCF 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 CDCF will immediately contact the police.

### 3. Record keeping

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

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## 4. Review of policy

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

Adopted by the board of CDCF on 2 of April 2019.