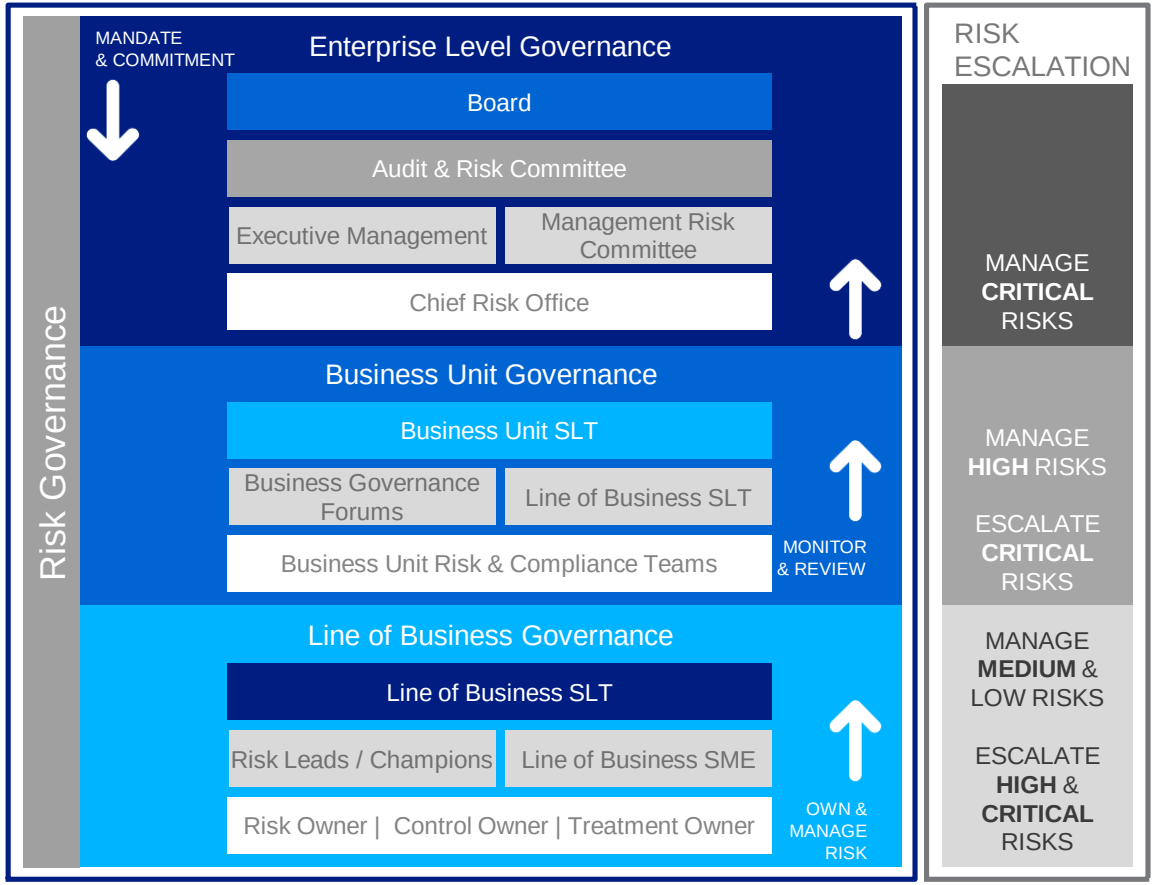
Risk Management
Fraud and Ethical Behaviour

Matt Hildebrand

How we manage risk: An enterprise approach



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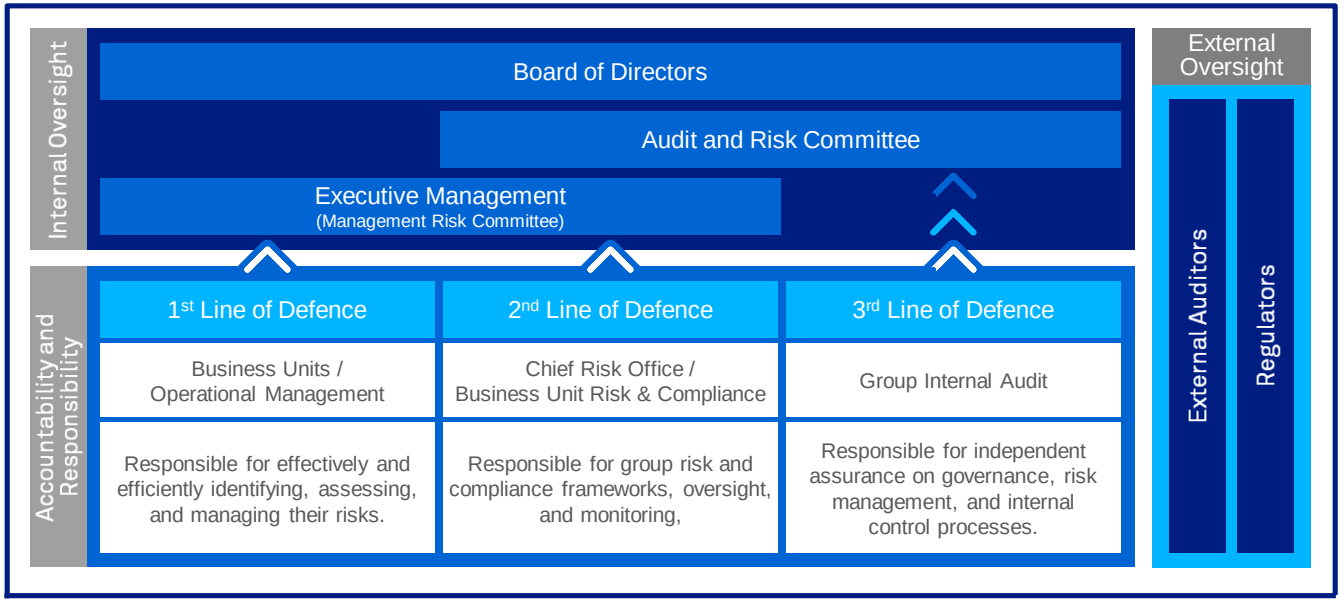
How we manage risk: Three Lines of Defence



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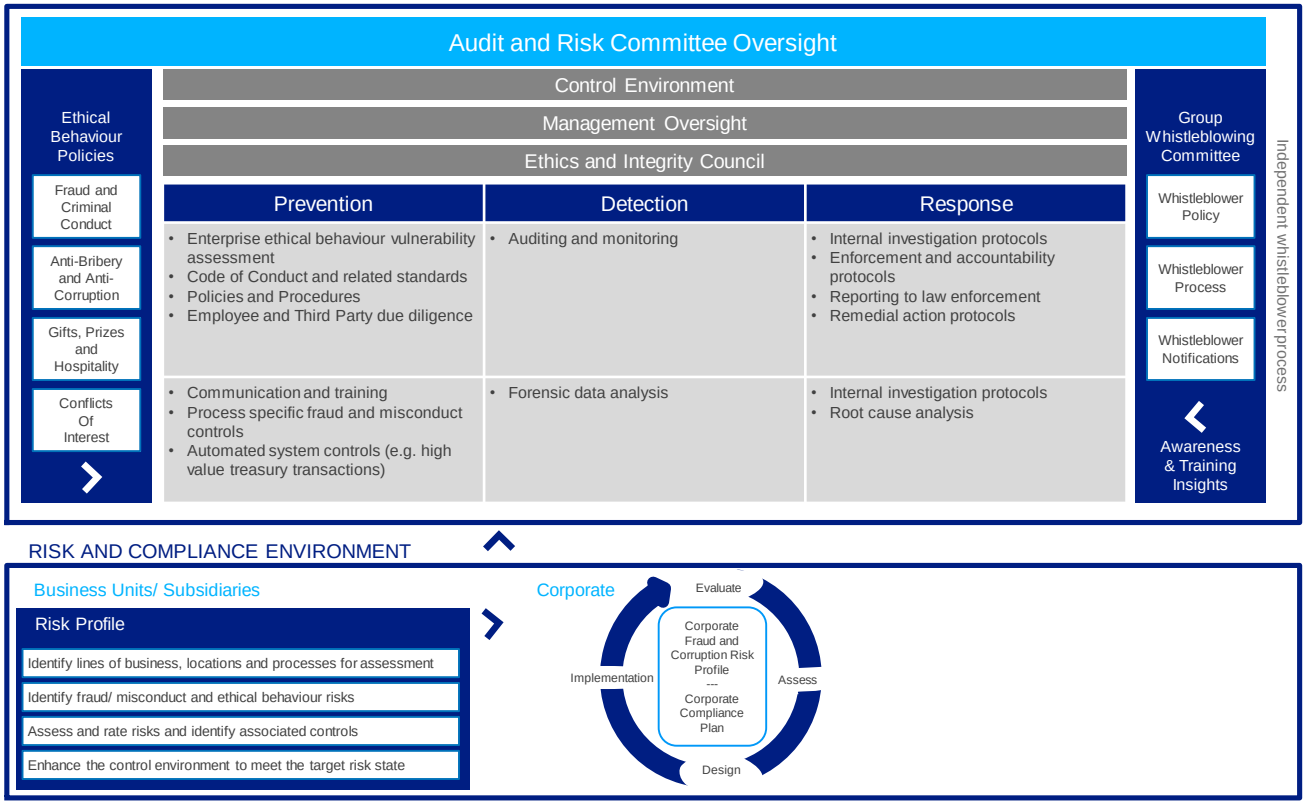
Telstra's Ethical Behaviour Framework



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Build the foundation

Company Integrity Policies
Fraud and Criminal Conduct
Anti-Bribery and Anti-Corruption
Conflicts of Interest and Outside Activities
Gifts, Prizes and Hospitality
Whistleblower

Governance and Risk Management
Audit and Risk Committee
Ethics and Integrity Council
Group Whistleblowing Committee
Risk registers and mitigation strategies
Ethical Behaviour Vulnerability Assessment

Process and Procedures
Security Incident Reporting process
Investigation process and capability
Conflicts of Interest register and reporting
Gifts, Prizes and Hospitality register and reporting
Whistleblower process and independent reporting

Training, Monitoring and Compliance
Mandatory compliance courses
Risk training programs
Controls compliance program
Ethics and Integrity Council reporting
Audit & Risk Committee reporting

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Values-based integrity policies

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Employee awareness

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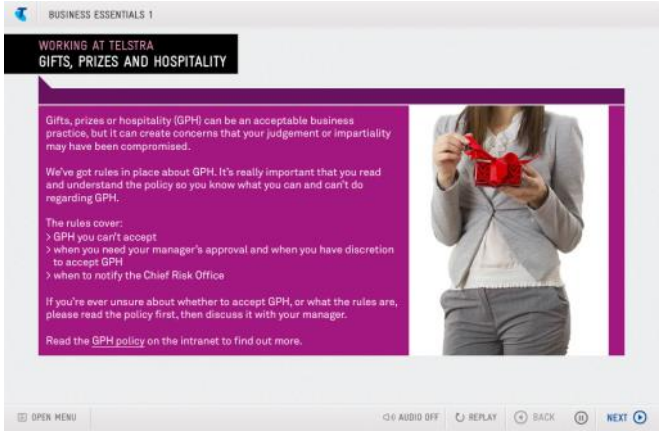
Policy support material

Acting with integrity

Communication

Reporting lines



Education and training

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Establish reporting lines

- People Managers
- Legal counsel
- HR support
- Chief Risk Office
- System tools
- Whistleblower

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What to do when serious misconduct is detected

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Redress the issue, prevent it from reoccurring

Weaknesses and vulnerabilities

- Assess policy and procedures
- Assess systems and controls

Recommendations

- Additional accountabilities
- Values and culture
- New procedures
- Policy changes
- Communication
- Mitigations
- Awareness
- Education

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