

25 July 2006

Ms. Joanne Blackburn  
First Assistant Secretary  
Criminal Justice Division  
Attorney-General's Department  
Robert Garran Offices  
National Circuit  
BARTON ACT 2600

Dear Ms Blackburn,

**Release of Foreign Bribery Awareness Survey Response prepared in relation to the OECD Convention Against Bribery of Foreign Public Officials in International Business Transactions**

I refer to your letter dated 26 June 2006 to Mr. Polson, the then acting Chief Executive Officer of the AWB Limited Group of Companies ("AWB"), in relation to the above matter. Our Chairman, Mr. Brendan Stewart, has asked me to respond to your letter, which I am pleased to do.

AWB considers that it would be inappropriate for Mr. Cooper's survey response to be made available to the Senate Committee. This is because Mr. Cooper is no longer an employee of AWB and, most fundamentally, his response does not present a contemporaneous summary of the activities and arrangements AWB has in place to address awareness of foreign bribery and to ensure compliance with the law.

AWB does, however, recognise the importance of the survey process and the Senate's interest in this issue. Accordingly, I set out below AWB's updated response to the questions raised in the survey and confirm that AWB has no objection to this letter being made available to the Senate.

**Survey Response**

In order to raise awareness about foreign bribery, I understand that AWB has, over the past 18 months, Mr. Cooper presented training seminars to various staff which included education on foreign bribery and payments made in relation to the international wheat sales. I also understand that the seminars were supported with a written text.

AWB has the following governance arrangements in place to ensure compliance with the law:

- A Corporate Ethics and Code of Conduct which is distributed to all staff and is available on the AWB intranet and website ([www.awb.com.au](http://www.awb.com.au));
- A Whistleblower Policy, the stated aim of which is to provide an avenue for employees to raise concerns and reassurance that they will be protected from reprisal or victimisation for whistleblowing in good faith; and
- A policy entitled "Payments in Connection with International Wheat Sales", the purpose of which is to articulate the types of payments and arrangements related to international sales of wheat (including without limitation rebates, commissions, service fees, agency fees and facilitation payments) which are acceptable to the AWB National Pool.

AWB continues to obtain legal advice and guidance on issues relating to foreign payments.

Further, as announced to the Australian Stock Exchange on 9 February 2006, the Board of Directors of AWB Limited has commissioned PricewaterhouseCoopers, to conduct a special review of the design and operation of internal controls around current wheat export sales. The objective of the review is to assess AWB's systems of control and, where necessary, implement improvements. Any recommendations made by PricewaterhouseCoopers will be assessed and responded to as quickly as possible.

If I can be of further assistance in relation to this matter please contact me on (03) 9209 2517.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Paul Ingleby', with a large, sweeping flourish extending to the right.

**Paul Ingleby**  
**Chief Operating Officer/CFO**  
**AWB Limited**