Anti-Bribery and Corruption Policy

1. Purpose

The purpose of this policy is to establish controls to ensure compliance with all applicable anti-bribery and corruption regulations, and to ensure our business is conducted in a socially responsible manner.

This policy applies to all Group companies in all states and territories where we operate and should be read in conjunction with related Group policies and procedures where appropriate – notably our *Employee Code of Ethics and Conduct*.

2. Policy statement

Bribery is the offering, promising, giving, accepting or soliciting of an advantage as an inducement for action which is illegal or a breach of trust. A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage.

It is our policy to conduct all of our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption. We are committed to acting professionally, fairly and with integrity in all our business dealings and relationships implementing and enforcing effective systems to counter bribery and corruption.

We will uphold all laws relevant to countering bribery and corruption in all the jurisdictions in which we operate and are bound by the laws of Australia, including the Commonwealth Criminal Code and the Corporations Act 2001, in respect of our conduct.

Bribery and corruption are punishable for individuals by imprisonment and a fine. If we are found to have taken part in corruption, as a company we could face an unlimited fine, be excluded from tendering for public contracts and face damage to our reputation. We therefore expect everyone to take our legal responsibilities very seriously.

3. Scope

3.1 Who is covered by the policy?

In this policy, **third party** means any individual or organisation you meet during the course of your work for us, and includes actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies, including their advisors, representatives and officials, politicians and political parties. All arrangements with third parties should be subject to clear contractual terms, including specific provisions requiring them to comply with minimum standards and procedures in relation to bribery and corruption. Appropriate wording to be included in contracts can be obtained from the Commercial Management team.

This policy applies to all employees (whether permanent, fixed-term or temporary), consultants, contractors, trainees, home workers, casual workers and agency staff, or any other person associated with us, or any of our subsidiaries or their employees, wherever located (collectively referred to as **employees** in this policy). It also applies to all members of the Management Team.

This policy covers:

- bribes;
- gifts and hospitality;
- political contributions; and
- charitable contributions

3.2 Bribes

Employees must not engage in any form of bribery, either directly or through any third party.

3.3 Gifts and hospitality

Please see our Employee Code of Ethics and Conduct – Clause 8)

3.4 Political contributions

We do not make donations, whether in cash or kind, in support of any political parties or candidates, as this can be perceived as an attempt to gain an improper business advantage.

3.5 Charitable contributions

Charitable support and donations are acceptable (and indeed are encouraged), whether of in-kind services, knowledge, time or direct financial contributions. However, employees must be careful to ensure that charitable contributions are not used as a scheme to conceal bribery. We only make charitable donations that are legal and ethical. No donation on behalf of the organisation must be offered or made without the prior approval of the Group CEO.

4. Record-keeping

You must declare and keep a written record of all gifts accepted or offered, which will be subject to management review.

You must ensure all expense claims relating to hospitality, gifts or expenses incurred to third parties are submitted in accordance with our expenses policy.

5. How to raise a concern

You are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. If you are unsure whether a particular act constitutes bribery or corruption, or if you have any other queries or concerns, these should be raised with your line manager, a member of the Group's Management Team or the Group CEO, if you feel you cannot raise it with any of the above.

6. What to do if you are a victim of bribery or corruption

It is important that you tell your line manager or the Group CEO as soon as possible if you are offered a bribe by a third party, are asked to make one, suspect that this may happen in the future, or believe that you are a victim of another form of unlawful activity.

7. Protection

Employees who refuse to accept or offer a bribe, or those who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

8. Training and communication

Training on this policy forms part of the induction process for all new employees.

Our zero-tolerance approach to bribery and corruption must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and as appropriate thereafter.

9. Who is responsible for the policy?

The Management Team has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it. The Group Compliance Manager has primary and day-to-day responsibility for implementing this policy and for dealing with any queries on its interpretation. Managers at all levels are responsible for ensuring those reporting to them are made aware of and understand this policy.

All employees are responsible for the success of this policy and should ensure they use it to disclose any suspected danger or wrongdoing.

This policy may be amended at any time but is to be review at least annually.



Chief Executive Officer 31st December 2020