

ANTI-BRIBERY ANIT-CORRUPTION POLICY

1. Background

The Company is committed to conducting all of its business activities fairly, honestly with integrity, and in compliance with all applicable laws, rules and regulations. Its Board, management and employees are dedicated to high ethical standards and recognise and support the Company's commitment to compliance with these standards.

In particular, the Company is committed to preventing any form of Corruption and Bribery and to upholding all laws relevant to these issues, including the Anti-Corruption Legislation. In order to support this commitment, the Company has adopted this Anti-Bribery and Anti-Corruption Policy (**ABC Policy**) to ensure that it has effective procedures in place to prevent Corruption and Bribery.

This ABC Policy applies globally. To the extent that local laws, codes of conduct or other regulations (**Local Laws**) in any countries are more rigorous or restrictive than this ABC Policy, those Local Laws should be followed by any subsidiary operating in that country. Where a country has specific bribery and corruption Local Laws which are less rigorous than this ABC Policy, this ABC Policy prevails. The Company may, from time to time, provide country-specific directions for subsidiaries operating in countries outside of Australia.

This ABC Policy sets out the Company's requirements in relation to interactions with Officials and Third Parties. This ABC Policy does not prohibit interactions with Officials, rather it forbids corrupt interactions with those individuals.

In this ABC Policy, references to the Company includes references to the Company and all of its subsidiaries.

2. Definitions

In this ABC Policy the following words or phrases mean the following:

Anti-Corruption Legislation includes many laws such as the *Criminal Code Act 1995 (Cth)*, the *Foreign Corrupt Practices Act (FCPA) (US)* and any applicable anti-corruption laws and regulations applicable to the location in which the Company operates.

Bribery is the act of offering, promising, giving or accepting a benefit with the intention of influencing a person who is otherwise expected to act in good faith or in an impartial manner, to do or omit to do anything in the performance of their role or function, in order to provide the Company with business or a business advantage that is not legitimately due (whether in respect of an interaction with an Official or any commercial transaction in the private sector).

Business Associates means third party companies and individuals (such as joint venture partners, consultants and agents) acting on the Company's behalf, whether directly or indirectly, by representing the Company's interests to foreign governments in relation to international business development or retention of business opportunities.

Corruption is the abuse of entrusted power for private gain.

Facilitation Payment means payments of nominal amounts or other inducement made to persons in order to secure or expedite the performance of a Government Official's routine governmental duties or actions.

Gifts, Entertainment and Hospitality includes the receipt or offer of presents, meals or tokens of appreciation and gratitude or invitations to events, functions, or other social gatherings, in connection with matters related to the Company's business unless they:

- (a) fall within reasonable bounds of value and occurrence;
- (b) do not influence, or are not perceived to influence, objective business judgement; and
- (c) are not prohibited or limited by applicable laws or applicable industry codes.

Government Official means:

- (a) any politician, political party, party official or candidate of political office;
- (b) any official or employee of a domestic or foreign government (whether national, state/provincial or local) or agency, department or instrumentality of any domestic or foreign government or any government-owned or controlled entity (including state-owned enterprises);
- (c) any official or employee of any public international organisation;
- (d) any person acting in a private or public official function or capacity for such domestic or foreign government, agency, instrumentality, entity or organisation;
- (e) any person who holds or performs the duties of any appointment created by custom or convention or who otherwise acts in an official capacity (including, some indigenous or tribal leaders who are authorised and empowered to act on behalf of the relevant group of indigenous peoples and members of royal families);
- (f) any person who holds themselves out to be an authorised intermediary of a government official.

Item of Value includes, amongst other things, cash, travel, meals, Gifts, Entertainment and Hospitality, other tangible or intangible benefits or anything of value.

Money-laundering means the process by which a person or entity conceals the existence of an illegal source of income and then disguises that income to make it appear legitimate.

Official means a Government Official, political party, official or officer of a political party or candidate for political office.

Personnel means all persons acting (whether authorised or unauthorised) on behalf of the Company at all levels, including officers, directors, temporary staff, contractors, consultants and employees of the Company.

Secret Commissions means offering or giving a commission to an agent or representative of another person that is not disclosed by that agent or representative to their principal to induce or influence the conduct of the principal's business.

Secure an improper advantage includes obtaining any commercial or financial benefit.

Third Party means any individual or organisation other than Officials, with whom Personnel come into contact during the course of their employment or business relationships associated with the Company.

3. Purpose

The purpose of this ABC Policy is to:

- (a) set out the responsibilities of the Company and its management and Personnel in upholding the Company's commitment to preventing any form of Bribery or Corruption; and
- (b) provide information and guidance to Personnel on how to recognise and deal with any potential Bribery and Corruption issues.

4. Summary Guidance

<p>DO NOT OFFER, GIVE OR ACCEPT BRIBES</p> <p>The Company and anyone acting on behalf of the Company (including employees, intermediaries and other third parties) must not offer, give, agree to give, or authorize a Bribe, nor must they accept a Bribe in the course of their employment or work for the Company under any circumstances.</p> <p>TAKE APPROPRIATE STEPS TO ENSURE INTERMEDIARIES DO NOT OFFER, PAY OR ACCEPT BRIBES</p> <p>The Company and its employees must be alert to the bribery and corruption risks presented by their intermediaries and take appropriate steps to mitigate them in accordance with this Policy.</p> <p>DO NOT MAKE FACILITATION PAYMENTS</p> <p>This prohibition applies even where Facilitation Payments are common and generally permitted. The only exception to the prohibition on Facilitation Payments is any payments made to assure the immediate personal safety of an individual. Such payments would not be considered a violation of this Policy, but must nevertheless be immediately reported to your manager, Chief Executive Officer, Managing Director or Company Secretary and properly recorded.</p> <p>DOCUMENT APPROPRIATELY</p> <p>It is essential that the Company's books and records accurately reflect all payments and Anything of Value given or received. It is important that invoices received from Intermediaries also accurately reflect the nature of payments and Anything of Value made in relation to our business.</p>	<p>REMAIN VIGILANT</p> <p>You should remain vigilant, particularly in high risk corruption environments, and when dealing with public officials or intermediaries. Bribery and corruption risks change and evolve over time, and although this Policy seeks to identify some of the key areas where the Company is aware that risks may emerge, employees must remain aware of the Company's exposure to requests for Bribery in the full range of the Company's operations.</p> <p>UNDERSTAND THE CORRUPTION RISKS AND POLICY REQUIREMENTS APPLICABLE TO YOUR JOB</p> <p>These will vary depending on the nature of your responsibilities and sometimes the risks are not obvious.</p> <p>REPORT CONCERNS</p> <p>If you have questions or doubts as to whether your actions or the actions of others are consistent with this Policy, seek advice. You must also report any known or suspected violations of this Policy in the same way. The Company does not tolerate or permit any form of retaliation against any person who reports a suspected violation in good faith.</p> <p>VIOLATION OF THIS POLICY MAY RESULT IN DISCIPLINARY ACTION</p> <p>Where an employee is found to have acted in breach of this Policy, that employee will be subject to disciplinary action, up to and including possible termination of employment.</p> <p>Intermediaries who engage in practices inconsistent with, or in violation of this Policy, are deemed to have violated their contractual obligations to the Company and are subject to immediate termination of their engagement with the Company.</p>
---	---

5. Scope and authority

The Company requires all Personnel to comply with this ABC Policy as well as the Anti-Corruption Legislation. The prevention, detection and reporting of Bribery and other forms of Corruption are the responsibility of all those working for the Company or under its control.

This ABC Policy applies to all Personnel, including directors, temporary staff and contractors, and Business Associates of the Company. This Policy supplements, and does not replace, the Code of Conduct applicable to the Company and any of its subsidiaries.

6. Responsibility for policy compliance and training

- (a) The Company's Board is responsible for the overall administration of this ABC Policy. The Board will monitor the implementation of this ABC Policy and will review on an ongoing basis the ABC Policy's suitability and effectiveness. Internal control systems and procedures will be audited regularly to ensure that they are effective in minimising the risk of non-compliance with this ABC Policy.
- (b) In addition to the Board, each of the Company's subsidiaries outside Australia has designated executives responsible for monitoring and applying this ABC Policy.
- (c) A copy of this ABC Policy will be made available to all Personnel and in such other ways as will ensure the ABC Policy is available to Personnel wishing to use it.
- (d) All Personnel are required to understand and comply with this ABC Policy and to follow the reporting requirements set out in this ABC Policy. To this end, regular and appropriate training on how to comply with this ABC Policy will be provided to all senior managers and other relevant Personnel by the Board for each business. However, it is the responsibility of all Personnel to ensure that they read, understand and comply with this ABC Policy.
- (e) All Business Associates are required to be made aware of this ABC Policy and to undertake to comply with this ABC Policy in relation to any of their dealings with, for or on behalf of the Company.
- (f) The prevention, detection and reporting of Bribery and other improper conduct addressed by this ABC Policy are the responsibility of all those working for or engaged by the Company. All Personnel should be vigilant and immediately report any breaches or suspicious activity to the officer responsible for compliance.

7. Consequences of breaching this ABC policy

- (a) Bribery and the related improper conduct addressed by this ABC Policy are very serious offences that will be taken seriously, reviewed and thoroughly investigated by the Company. Depending on the circumstances, the incident may be referred to regulatory and law enforcement agencies.
- (b) A breach of this ABC Policy may also expose Personnel and the Company to criminal and/or civil penalties, substantial fines, exclusion from tendering for government or private contracts, loss of business and reputational damage.
- (c) Breach of this ABC Policy by Personnel will be regarded as serious misconduct, leading to disciplinary action which may include termination of employment.

8. Policy

8.1 General

- (a) Personnel must:
- (i) understand and comply with this ABC Policy and attend all relevant training;
 - (ii) not engage in Bribery or any other form of Corruption or improper conduct;
 - (iii) not make Facilitation Payments;
 - (iv) not offer, pay, solicit or accept Secret Commissions;
 - (v) not engage in Money-laundering;
 - (vi) not give or accept Items of Value where to do so might influence, or be perceived to influence, objective business judgement or otherwise be perceived as improper in the circumstances.
 - (vii) obtain required approvals for political contributions and charitable donations;
 - (viii) maintain accurate records of dealings with Third Parties; and
 - (ix) be vigilant and report any breaches of, or suspicious behavior related to, this ABC Policy.
- (b) This ABC Policy does not prohibit the giving of normal and appropriate hospitality to, or receiving it from, Third Parties.

8.2 Prohibition against Bribery and Corruption

- (a) The Company strictly prohibits Personnel engaging in or tolerating Bribery or any other form of Corruption or improper conduct.
- (b) The Company's corporate values require that in all aspects of business all Personnel act honestly, adhere to the highest ethical standards, and act in compliance with all relevant legal requirements. In this respect Personnel must not engage in Bribery or any other form of Corruption.
- (c) The prohibition of Bribery under this ABC Policy includes the provision or conveying of an Item of Value to any Third Party, Official or family members of Officials, whether directly or indirectly, to secure any improper advantage or to obtain or retain business. This means that Personnel must not:
- (i) offer, promise or give an Item of Value with the intention of influencing an Official or Third Party who is otherwise expected to act in good faith or in an impartial manner, to do or omit to do anything in the performance of their role or function, in order to provide the Company with business or an improper advantage; or
 - (ii) authorise the payment or provision of Items of Value to any other person, if it is known, or reasonably should have been known, that any portion of that payment or Item of Value will be passed onto an Official or Third Party to secure an improper advantage or obtain or retain business; or
 - (iii) engage, or procure, a third party to make a payment or provide an Item of Value to an Official or Third Party, (or to procure another person to make such payment or provision), in order to secure an improper advantage or obtain or retain business.
- (d) The prohibition of Bribery under this ABC Policy also includes the request or acceptance of (or the agreement to accept) an Item of Value from an Official or Third Party either:

- (i) intending that, in consequence, a function or activity should be performed improperly (whether by the requestor/acceptor or another person); or
- (ii) where the request, agreement or acceptance itself constitutes the recipient's improper performance of a function or activity; or
- (iii) as a reward for the improper performance of a function or activity (whether by the recipient or another person).

8.3 Prohibition on Facilitation Payments, Secret Commissions and Money-laundering

- (a) The Company does not condone the making of Facilitation Payments, Secret Commissions and Money Laundering.
- (b) Personnel are prohibited from:
 - (i) making Facilitation Payments;
 - (ii) offering, paying, soliciting or receiving Secret Commissions; and
 - (iii) engaging in Money-laundering.

8.4 Personal safety exception

- (a) If a Employee reasonably believes that refusing to honor a request or demand for a Facilitation Payment would result in an imminent threat to the health or safety of themselves, their family members, or their colleagues, then the payment may be made.
- (b) Where such a payment must be made, the circumstances of the payment must be reported to the Managing Director, the Chief Executive Officer or the Company Secretary as soon as is practicable after the payment, and a written report submitted immediately thereafter. This exception is a limited one: it applies only to threats to physical health or safety; it does not apply when payments are demanded based on threats to commercial or financial interests.

Example:

You are travelling on business. When you arrive at the border, you are informed by the immigration agent that there is a small fee of EUR10 associated with the processing of the relevant documentation. You ask to see where the fee is provided for in writing, but are told that it is not. You are beginning to worry, as you need to be in the country for a meeting later that day. Under the circumstances, is payment of this fee permissible?

No. As the fee is not provided for in writing, it is unlikely to be a legally authorized cost associated with the expedition of a government process. You should refuse to pay the fee, and request to speak to the agent's supervisor.

Upon requesting to speak to the agent's supervisor, the agent becomes aggressive. You notice that the agent is repeatedly gesturing to security personnel, all of whom are armed. You begin to fear for your safety.

In this instance, payment of the fee **may be permissible**, and will not be considered in violation of this Policy, if it is made to assure your immediate personal safety. However, the payment must be reported to your supervisor, the Chief Executive Officer or Company Secretary as soon as possible.

8.5 Political Contributions and Charitable Donations

(a) Political Contributions

The Company prohibits Personnel from making political contributions to Officials on behalf of the Company. Any donations above a level determined in Federal legislation

must be disclosed annually to the Australian Electoral Commission and will be published on its website.

This ABC Policy does not seek to curtail an individual's freedom to make political contributions in their personal capacity.

The context of any other political contributions is key in determining their appropriateness. For instance, it is permissible for the Company to make a payment to attend a political function in circumstances where such payment could not be construed as an attempt to influence the political party.

If you are in any doubt as to the appropriateness of any political contribution, you should consult the Board before it is given or accepted or otherwise as soon as possible.

(b) **Charitable Donations and Sponsorships**

The Company believes in contributing to the communities in which it does business. In the right circumstances, it permits reasonable donations to charities and sponsorships. The Company, however, needs to be certain that such donations or sponsorships will not be used to disguise illegal payments to Public Officials in violation of applicable Anti-Bribery Laws. Therefore, all donations and sponsorships require written approval from the Chief Executive Officer, Managing Director or Company Secretary (in accordance with the established delegation of authority policy) before a charitable donation or sponsorship is made.

The Company can only make charitable donations that are legal and ethical under Local Laws and practices. In order to ensure that donations made by the Company to charitable organisations are for proper charitable purposes, Personnel must only make donations on behalf of the Company to charitable organisations previously approved by the Company and within approved financial limits.

When making a donation or charitable contribution, the following should be evaluated prior to commitment to or delivery of the donation:

- (i) the purpose of the payment;
- (ii) whether the payment is made at the request of a Public Official, a Public Entity or an employee of a customer or vendor;
- (iii) whether a Public Official, Public Entity or an employee of a customer or vendor is associated with the charity and, whether the public official or employee of a customer or vendor can make decisions regarding the Company's business; and
- (iv) whether the payment is conditional on directly or indirectly receiving any business or other benefits.

Charitable donations and sponsorships may only be given if they can be paid directly into a bank account of the charity or organization, unless the donation is an in-kind donation.

Only charities that are willing to agree to donations being made directly into their bank account may receive a donation or sponsorship from the Company.

8.6 Corporate social responsibility – community programs / capacity building

In addition to donations and sponsorships, the Company is committed to working constructively with the communities in which it conducts business and helping those communities to improve access to education, infrastructure, health and governance capabilities. The Company will consider any bona fide request for investment in such community programs. However, all such programs, including sponsorships, scholarships or contributions to education, infrastructure, health or governance projects must receive the written approval of the Chief Executive Officer (in

accordance with the established delegation of authority policy). All such donations and sponsorships must also be made directly to the bank account of the relevant organization (unless the donation is of an in-kind nature).

8.7 Interactions with Officials and Third Parties must be Compliant

- (a) All interactions with Officials, Third Parties and Business Associates must comply with this ABC Policy, and the Company and Personnel must not take any actions, whether direct or indirect, which create the appearance of impropriety regardless of whether there is any improper intent behind their actions.
- (b) The prohibitions under this ABC Policy include a prohibition on Personnel using personal funds to undertake any interaction or transaction that is prohibited under this ABC Policy.
- (c) The Company must implement the following procedures in relation to any “high risk Third Parties”:
 - (i) communicate this ABC Policy and any additional relevant anti-bribery policies to the high risk Third Party;
 - (ii) undertake sufficient due diligence to ensure that it is appropriate for the high risk Third Party to represent the Company and complete a due diligence report on the Third Party prior to engagement;
 - (iii) raise any issues or red flags identified in the due diligence to the Managing Director, Chief Executive Officer or Company Secretary and ensure such issues are adequately resolved prior to engagement;
 - (iv) ensure contractual terms with the Third Party include anti-bribery provisions consistent with this ABC Policy; and
 - (v) ensure oversight of the Third Party is maintained.

8.8 Promotional Items, Gifts and Entertainment

- (a) Promotional items, gifts, entertainment and other hospitality are often provided for a legitimate business purpose, such as building legitimate business relationships. However, they also pose risks to the Company, because they may compromise, or have the appearance of compromising, the exercise of objective business judgment. This risk is heightened where Public Officials are involved.
- (b) Promotional items, gifts, entertainment and other hospitality must never be used to corruptly or improperly influence business decisions.
- (c) In certain instances, however, it may be permissible for the Company to provide inexpensive and reasonable promotional gifts, refreshments, meals, travel expenses, accommodation, entertainment and/or similar items (collectively “Promotional Items”) to Public Officials and private persons and entities. The Company and its Employees can also receive Promotional Items, but such Promotional Items must not include the reimbursement of any travel expenses or accommodation costs.
- (d) Providing or receiving such Promotional Items is only permissible if:
 - (i) such Promotional Items are directly related to the promotion, demonstration or explanation of a Company product, business, service, or the execution or performance of a contract;
 - (ii) such Promotional Items are permitted by law;
 - (iii) the Promotional Item is not cash or a cash equivalent (such as a gift card), and is not lavish or offered or provided frequently;

Policies
Anti-Bribery & Anti-Corruption Policy

- (iv) the Promotional Item is commensurate with the legitimate and generally accepted local business custom in the country in question;
 - (v) the Promotional Item is not offered or received at a time when it could be perceived to impair objective business judgment, for example, when a regulatory approval (such as the granting of permits or licences) is being considered by that person or official (or their department), when a tender is pending, or when a transaction is under negotiation;
 - (vi) the giving or acceptance of the Promotional Items would not cause a third party to form an impression that there is an improper connection between that Promotional Item and a business opportunity; and
 - (vii) payment is made directly to the relevant service provider (to the greatest extent possible).
- (e) Promotional Items which satisfy the above criteria may be offered or received without prior authorization where they consist only of the following:
- (i) company-approved mementos or advertising items, such as coffee cups, calendars and pens, under \$50 in value;
 - (ii) modest refreshments separate from a meal, such as soft drinks, coffee and donuts;
 - (iii) business-related meals, as long as any such lunch meals are of reasonable value not to exceed the approximate equivalent of \$150 per person; and
 - (iv) in all instances, the cumulative market value of the Promotional Items does not exceed \$500 per recipient per year.
- (f) For any Promotional Items that may not meet these guidelines, written approval is required from the Chief Executive Officer before offering or accepting any other Promotional Item.
- (g) Any such expenditure that is approved and provided must be accurately recorded in the Company's books and records: see Section 8.10 of this Policy for further details. Supporting documentation for such expenses, such as an invitation to an event or a receipt for a gift that is purchased, will be maintained in the Company's records.
- (h) If Employees have any concerns about the appropriateness of a Promotional Item, they should consult their immediate Manager or seek prior authorization in accordance with the above.

Accepting Promotional Items

- (i) Employees must not, without written approval, accept any Promotional Item from any third party which appears to be valued in excess of \$50, or accept Promotional Items from any third parties where their cumulative value appears to be in excess of \$500 per year. If Employees have any concerns about the appropriateness or value of a Promotional Item, they should consult with their immediate Manager or seek approval to accept the item.

Example:

The Company has had a number of small, portable speakers branded with their company logo produced to give as gifts to clients at the end of the year. Each unit costs approximately \$30. Is this gift permissible under this Policy?

Yes. So long as the gifts are permitted by local law, the value of each small gift is less than the monetary limit permitted for that market, and the gifts are being given to a number of clients, rather than one Public Official.

One of the gift recipients, a Public Official from the local council, expresses his thanks for the gift, and comments that his children would very much like to receive such a gift also. You are aware that the Company is currently engaged in an active dispute with local council, and decide to give the Public Official two additional speaker sets, hoping that he will remember your kindness. Is this a permissible course of action?

No. Such gifts may be interpreted as an attempt to improperly influence the Public Official in order to obtain an improper advantage for the Company.

8.9 Reasonable and Bona Fide Travel Expenditures

- (a) As described in Section 8.8 above, in certain instances, it may be permissible for the Company to cover the travel expenses of Public Officials and private persons and entities. Offering or providing such travel expenditure will be permissible only if:
- (i) such travel expenditure is directly related to the promotion, demonstration or explanation of a Company product, business, service, or the execution or performance of a contract;
 - (ii) the offer or provision of such travel expenditure is permitted by law;
 - (iii) the travel expenditure is not lavish or offered or provided frequently;
 - (iv) the travel expenditure is commensurate with the legitimate and generally accepted local business custom in the country in question;
 - (v) the travel expenditures would not cause a third party to form an impression that there is an improper connection between that expenditure and a business opportunity;
 - (vi) the travel is for the Public Official only, not for his / her spouse or any other relative; and
 - (vii) payment is made directly to a relevant service provider (to the greatest extent possible).
- (b) Before offering, providing or receiving any travel expenditure, prior written approval is required from the Chief Executive Officer, Chief Financial Officer or the Head of Legal & Compliance.
- (c) Any travel expenditure that is approved must be accurately recorded in the Company's books and records. Supporting documentation for such an expense, such as an invitation to an event or a receipt for a flight that is purchased, must also be maintained in the Company's records.
- (d) Note: Travel or accommodation must not be received or accepted by Employees.

Example:

You are arranging a site visit for a Public Official at the site at which you work. The purpose of the site visit is to inspect compliance with local health and safety laws. You are authorized to pay for any expenses incurred with respect to the Public Official's travel and accommodation costs, as well as for meals.

As there is a **demonstrable business purpose** for this trip, related expenses are permissible, so long as they are reasonable and not extravagant or lavish.

The Public Official requests that he make his own travel arrangements, as he has an excellent relationship with his local travel agent. Is this permissible?

Maybe. However, it would be more prudent for the Company to organize all travel arrangements, and make any payments directly to the third-party service provider (i.e. an airline), to ensure compliance with the Company's policy.

The Public Official advises that he would like to bring his spouse along with him for the site visit, and it is clear from the conversation that he is also expecting the Company to pay for the travel and accommodation expenses of his spouse. As it is in the Company's best interests that the site visit goes well, you agree to pay for any expenses incurred with respect to the Public Official's spouse. Is this permissible?

No. Although there may be a demonstrable business purpose in paying the expenses of the Public Official, payment of expenses incurred by the Public Official's spouse may be viewed as an attempt to improperly influence the Public Official and, as such, is not permitted.

8.10 Documentation and Recordkeeping

- (a) As part of the Company's commitment to open and honest business practice the Company requires all of its businesses to maintain accurate books of account and records.
- (b) The Company and its subsidiaries must keep accurate and complete records of all business transactions:
 - (i) in accordance with generally accepted accounting principles and practices;
 - (ii) in accordance with the Company's accounting and finance policies; and
 - (iii) in a manner that reasonably reflects the underlying transactions and events.
- (c) It is the responsibility of all Personnel to ensure that all business transactions are recorded honestly and accurately and that any errors or falsification of documents are promptly reported to the appropriate member of the senior management team of the relevant business, and corrected. No accounts are to be kept "off the books" to facilitate or conceal improper payments.
- (d) All Personnel must record Items of Value given or received in expense reports and approved in accordance with the relevant expense policy.

8.11 Compliance with Local Laws Required

If Local Laws in a particular country or region are more restrictive than this ABC Policy, then any Personnel, including any Business Associates operating in that country or region must fully comply with the more restrictive requirements.

8.12 Reporting Violations and Suspected Misconduct

- (a) Any Personnel or stakeholder who believes that a violation of this ABC Policy or any laws has been committed, is being committed, or is being planned, should report the matter immediately to the Board.
- (b) If anyone is unsure whether a particular act constitutes Bribery, a Facilitation Payment, Secret Commission, Money-laundering or an improper Item of Value, or has any other queries, they should ask the Board or the Managing Director or Chief Executive Officer or Company secretary.

8.13 Protection

- (a) The Company prohibits retaliation against anyone reporting such suspicions.

- (b) Personnel who wish to raise a concern or report another's wrongdoing, or who have refused pressure to either accept or offer a bribe, should not be worried about possible repercussions. The Company encourages openness and will support any Personnel who raises genuine concerns in good faith under this ABC Policy.
- (c) If you are not comfortable, for any reason, with speaking directly to the Board or the Managing Director or the Chief Executive Officer or Company Secretary, the Company has a Whistleblower Protection Policy which affords certain protections against reprisal, harassment or demotion for making the report.

9. Monitoring and Review

- (a) Material breaches of this ABC Policy will be reported to the Board or a committee of the Board.
- (b) The Board will monitor the content, effectiveness and implementation of this ABC Policy on a regular basis. There may also be independent reviews taken from time to time. Any findings, updates or improvements identified will be addressed as soon as possible.
- (c) Personnel are invited to comment on this ABC Policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to the Board or the Company Secretary.