



Anti-Bribery and Corruption (AB&C) Policy

1. Purpose

Alfabs employees should act fairly, with integrity and honesty to maintain ethical standards and uphold Alfabs' reputation. It is the policy of Alfabs to conduct all its business in an honest, open and ethical manner. Alfabs has zero tolerance for any activity that seeks to bribe or otherwise improperly influence another person in any country that differs from that person's proper duties.

2. Policy Scope

This policy applies to all people anywhere within Alfabs including directors, officers, employees, contractors and volunteers of Alfabs and its subsidiaries and/or related entities (collectively referred to in this Policy as "Alfabs"). Our policy serves as a single and consistent benchmark across the Alfabs Group and is designed to comply with the Australian Criminal Code Act 1995 and all other Anti-Bribery and Corruption related laws relevant to our company locations.

3. Related Documents

Modern Slavery Statement

4. Policy Owner

Group General Manager

5. Definitions

AB&C: Anti-Bribery and Corruption

Bribe: an inducement or reward (financial or otherwise) provided, promised or offered in order to gain any commercial, regulatory, contractual or personal advantage, or with the intent of persuading a person to do their job in an inappropriate or improper way. A bribe can be cash, unreasonable gifts or lavish hospitality, unwarranted rebates, excessive commissions or uncompensated use of company resources, services or facilities.

Corruption: An act or omission for an improper or unlawful purpose, which involves the abuse of a position of trust or power.

Employee: For the purposes of this policy, an Employee includes:

- Permanent employees: employed directly through the Group as a regular, maximum term, casual, executive, or apprentice/trainee
- Contractors: employed through a preferred recruitment agency including the engagement of an apprentice or trainee.
- Service providers: employed by a Third Party vendor and have access to the Group's IT network and systems.

6. Policy

The purpose of this policy is to:

- Provide information and guidance to people working for Alfabs on how to recognise and deal with bribery and corruption issues; and
- Set out Alfabs' responsibilities, and the responsibilities of the people engaged by Alfabs, to comply with Alfabs' prohibition of bribery and corruption of officials, commissions, payments or kickbacks and improper gifts and hospitality.

Alfabs shall uphold all relevant laws, regulations and legislation to prevent and counter bribery and corruption in the jurisdictions where we operate.

Alfabs prohibits the giving, promising, offering, accepting, authorising or requesting a bribe. Bribery includes improperly promising, offering or giving a benefit (monetary or otherwise) or rewarding the improper exercise of the functions or duties of another person.

Australian law provides for significant penalties for bribery and corruption, for individuals involved in unlawful conduct as well as corporate penalties. Individuals can face imprisonment and/or penalties, companies can face significant penalties and fines.

Speaking up and Reporting

Principal channels for reporting bribery and corruption concerns are directly to your manager or any senior manager. The Alfabs Grievance Policy provides guidelines on how to report to both internal and external channels.

We assess and investigate all allegations of bribery, corruption and other related anti-bribery and corruption matters independently and determine whether or not the allegation is substantiated. If substantiated, it must be determined whether the conduct amounts to reportable conduct requiring escalation to an Alfabs Executive, Director or external agency.

Accountabilities**Group General Manager:**

Approving this policy, and any material changes to it

Reporting to the Chief Executive Officer on any breaches or material issues regarding AB&C matters

Senior Leadership Team:

Overseeing the design and implementation of the Group's management framework including AB&C risk assessment and management

Promoting a culture of compliance with the AB&C obligations

Providing advice and guidance on AB&C controls, frameworks and issues

Group People Advisor:

Reporting and escalating AB&C matters to the appropriate stakeholders

Ensuring this Policy is periodically reviewed and updated

Employees:

Ensure you comply with the principle of zero tolerance towards bribery and corruption

Understand the process for reporting AB&C matters

Breach of Policy

A breach of AB&C laws may result in legal or regulatory action including criminal proceedings and the revocation of licences, significant reputational damage and/or financial loss - to employees, Group entities and to the Group as a whole.

A breach of this Policy may be regarded as misconduct, which may result in disciplinary action including termination of employment.

Uncontrolled in Paper Form – Reader Responsibility to ensure latest revision by checking on Mango

Created by: Emily Chambers on Thursday, 23/06/2022
Approved by: Jason Torrance on Tuesday, 10/01/2023
Published by: Emily Chambers on Tuesday, 10/01/2023