

Anti Bribery & Corruption Policy

Aim:

One of Brandworx Shared Values is that we always act lawfully, ethically and with integrity and respect for the community and the environment.

Bribery and the related improper conduct referred to in this Policy are not only serious criminal and civil offences but are also contrary to our Shared Values.

Engaging in such conduct may result in Brandworx incurring very large fines, legal and compliance-related costs, and civil liability and jail sentences for individuals involved. It can also result in serious damage to Brandworx reputation and market value.

This Policy:

(a) sets out our responsibilities, and the responsibilities of those working for us, in relation to bribery and corruption.

(b) provides information and guidance to those working for us on how to recognise and deal with bribery and corruption issues.

(c) Who is covered by the Policy? This Policy applies to all individuals working for or on our behalf at all levels, including senior managers, officers, directors, employees (whether permanent, fixed-term or temporary), consultants, contractors, trainees, seconded staff, casual workers and agency staff, third party service providers, agents, sponsors, or any other person associated with Brandworx, wherever located (collectively referred to as "Staff" in this Policy).

Our Policy: Bribery, corruption and influence peddling are prohibited.

1. We conduct our business lawfully, ethically and with integrity. Corrupt practices are unacceptable, and we take a zero-tolerance approach to bribery, corruption, and influence peddling. We are committed to acting professionally, fairly and with integrity and respect in all our business dealings and relationships wherever we operate and implementing and enforcing effective systems to counter bribery. We will comply with the legal and regulatory framework in each country in which we operate.

2. We also expect those that we do business with to take a similar zero tolerance approach to bribery and corruption. Before entering into an agreement with any third party who will act on behalf of Brandworx, Brandworx will perform proper and appropriate due diligence and obtain from the third-party certain assurances of compliance.

3. This Policy has been approved by the Brandworx Directors and Senior Management in order to show Brandworx commitment to dealing with bribery and corruption issues. Brandworx has established a prevention group which meets on a regular basis. This group is responsible for the training of new staff on our Policy when commencing at Brandworx.



4. Management and senior staff at all levels are responsible for implementing this Policy in their respective workplaces and for ensuring those reporting to them are made aware of and understand this Policy.

5. What are bribery, corruption, and influence peddling?

5.1 Corruption is the abuse of public or private office for personal gain.

5.2 A bribe is an inducement or reward offered, promised, or provided, directly or indirectly, to a government official or a participant in a private commercial transaction in order to gain any commercial, contractual, regulatory or personal advantage by improper performance of a relevant function or activity. Whilst bribery of government officials or private individuals is equally prohibited under this policy, particular care needs to be taken when dealing with the former as anti-corruption laws are generally more onerous, with specific penalties applying, when government officials are involved.

5.3 It is prohibited to give a gift or hospitality with the expectation that a business advantage will be received or to reward a business advantage given. Our Staff cannot solicit gifts. Gifts may only be accepted if they are given on an infrequent basis, for the sole purpose of cultivating or enhancing a business relationship, and below the financial limit of \$20.00. Hospitality or gifts must not, however, be given to or accepted from customers or suppliers, regardless of their value, in the period leading up to and during a tender process or contract negotiations in which that customer or supplier is participating. If Staff are not sure whether they are in a period leading up to a tender, they must contact the Brandworx Senior Management.

6. Political Donations: We do not make contributions to political parties, organisations or individuals engaged in politics.

7. Training on this Policy shall form part of the induction process for all new Staff. Staff that may be more likely to be exposed to bribery given their role and position will receive appropriate training on how to implement and adhere to this Policy.

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

9. Monitoring and review -The Bribery Prevention Group will monitor the effectiveness and review the implementation of this Policy regularly considering its suitability, adequacy and effectiveness. Improvements identified will be made as soon as possible. Internal control systems and procedures will be subject to regular audits to provide assurance that they are effective in countering bribery and corruption.

10. All Staff are responsible for the success of this Policy and should ensure they use it to disclose any suspected breach or wrongdoing.

