

ANTI BRIBERY POLICY

Intent & Purpose

This policy describes the controls to ensure compliance with all applicable anti-bribery and corruption regulations and to ensure that Springmount Services business is conducted in a socially responsible manner.

We take our anti bribery responsibility towards our clients very seriously and expect that all suppliers, third party partners and our people will do the same.

Principles

We are committed to conducting all of our business honestly and ethically. 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 wherever we operate and implementing and enforcing effective systems to counter bribery.

Operation and Incidence

Operation

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

It is our policy to conduct all of our business honestly and ethically. We take a zero-tolerance to breaches of this trust.

We will uphold all laws relevant to countering bribery and corruption in all the jurisdictions in which we operate. We remain bound by the laws in Australia regarding our conduct both at home and abroad.

Consequence

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

Scope

In this policy, third party means any individual or organisation our people come into contact with during their 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.

This policy applies to all individuals working at all levels and grades, including senior managers, officers, directors, employees (whether permanent, fixed-term or temporary), consultants, contractors, trainees, seconded staff, homeworkers, casual workers and agency staff, volunteers, interns, agents, sponsors, 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).

This policy covers:

- Bribes.
- Gifts and hospitality.
- Facilitation payments.
- Political contributions.
- Charitable contributions

Amplification

Bribes

Employees must not engage in any form of bribery, either directly or through any third party (such as an agent or distributor). Specifically, employees must not bribe a public official anywhere in the world.

Gifts and hospitality

Employees must not offer or give any gift or hospitality which could be regarded as illegal or improper or which violates the recipient's policies; or

- to any public employee or government officials or representatives, or politicians or political parties; or
- which exceeds \$100 in value for each individual gift or \$500 in value for each hospitality event (not to exceed a total value of \$1000 in any financial year), unless approved in writing by the employee's manager.

Employees may not accept any gift or hospitality from our business partners if:

- it exceeds \$100 in value for each gift or \$500 in value for each hospitality event (not to exceed a total of \$1000 in any financial year) unless approved in writing by the employee's manager; or
- it is in cash; or
- there is any suggestion that a return favour will be expected or implied.

A manager's approval is required above; if the manager is below Director level, permission must be sought from an appropriate Director. If it is not appropriate to decline the offer of a gift, the gift may be accepted, provided it is then declared to the employee's manager and donated to charity.

We appreciate that the practice of giving business gifts varies between countries and regions, and what may be expected and acceptable in one area may not be in another.

The test to be applied is whether the gift or hospitality is reasonable and justifiable in all circumstances. The intention behind the gift should always be considered.

Within these parameters, local management may define specific guidelines and policies to reflect local professional and industry standards. This policy requires written approval to be given; the Company Secretary shall put in place a process to maintain a register of all such approvals.

Facilitation payments and kickbacks

Facilitation payments are a form of bribery made to expedite or facilitate a public official's performance for a routine governmental action and not to obtain or retain business or any improper business advantage. Facilitation payments tend to be demanded by low-level officials to bring a level of service to which one would generally be entitled.

Our strict policy is that facilitation payments must not be paid. We recognise, however, that our employees may be faced with situations where there is a risk to the personal security of an employee or his/her family and where a facilitation payment is unavoidable, in which case the following steps must be taken:

- Keep any amount to the minimum.
- Create a record concerning the payment; and
- Report it to your line manager.

To achieve our aim of not making any facilitation payments, each business of the Company will keep a record of all payments made, which must be reported to the Company Secretary to evaluate the business risk and develop a strategy to minimise such payments in the future.

Political Contributions

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

Charitable contributions

Charitable support and donations are acceptable (and indeed are encouraged), whether 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 under local laws and practices]. No donation must be offered or made without the prior approval of the CEO.

All charitable contributions should be publicly disclosed.

Subordinate documents

- Nil

RACI

Responsible	Implementation of this policy is the responsibility of all employees and third-party suppliers. Responsibility for the maintenance and communication of this policy is shared by the Operations Management and Finance team.
Accountable	The final authority for this policy lies with the CEO.
Consulted	When making changes to this policy, consultation should be carried out with employees, relevant contractors, and the leadership team.
Informed	All changes to this policy should be communicated to all employees and relevant contractors.

Individual Responsibilities

You must ensure that you read, understand and comply with this policy. The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for us or under our control. All employees are required to avoid any activity that might lead to, or suggest, a breach of this policy. You must notify your manager OR the Company Secretary or the confidential helpline as soon as possible if you believe or suspect that a conflict with or breach of this policy has occurred or may occur in the future.

Breach of The Policy

Breach of this policy may be regarded as misconduct, leading to disciplinary action, which may result in termination of employment or engagement. An individual may also be exposed to criminal or civil liability for a breach of relevant legislation. We reserve our right to terminate our contractual relationship with other workers if they breach this policy.