



# Corruption

## Anti-Bribery and Corruption Policy

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## Anti-Bribery and Corruption Policy

### ❖ Purpose

To set out the standards of behaviour expected to minimise the risk of bribery or corruption occurring in connection with its activities and, provide guidance when dealing with instances of bribery or corruption.

### ❖ Scope

This policy applies to all directors, senior executive officers, workers (including casual workers), and other individuals or entities that are effectively controlled by Xyz Company Proprietary Limited.

### ❖ Policy

Xyz Company Proprietary Limited is committed to conducting business ethically and honestly and is committed to implementing systems to prevent bribery and corruption from occurring. The organisation has a zero-tolerance approach to bribery and corruption. This includes instances where a bribe may not take place but is promised to be given or agreeing to receive a bribe.

Every representative of Xyz Company Proprietary Limited must act with integrity and to understand and comply with the policy and procedures.

Bribery and corruption for the instance of this policy involves offering, giving, authorising, soliciting, promising or accepting of a benefit to any person where the benefit is:

- not legitimately due, e.g. a legal, commercial transaction;
- offered or given to that person to influence them in some manner or gain an advantage;
- sought by dishonest or fraudulent conduct by those in power for personal gain;
- illegitimate, immoral or incompatible with ethical standards.

Bribery can include (monetary or otherwise) but is not limited to:

- cash payments or cash equivalents, e.g. shares, cryptocurrency;
- loans or other transactions;
- unwarranted allowances;
- kick-backs;
- political contributions and charitable contributions;
- employment opportunities;
- social benefits;
- sexual favours;
- gifts, travel, and hospitality;
- use of company services or facilities.

Any breach of this policy or, breach of the law, could result in disciplinary action, including dismissal or in relevant cases, the police informed where offences might carry criminal liability.

**Signature:**

*(To be signed by Director/CEO of Company)*

**Date:**