



# Anti-Bribery and Corruption Policy

## SCOPE

This Anti-Bribery and Corruption Policy (“**Policy**”) relates to Supply Network Limited (“**Supply Network**”) and its related bodies corporate (together “**Supply Network**”, “**we**”, “**our**” and “**us**”).

This Policy forms part of Supply Network’s risk management and corporate governance framework. It has been approved by the Supply Network Board of Directors and will be reviewed no less than annually during formal reviews of the governance framework.

Supply Network takes seriously its responsibility to promote good business ethics. To ensure compliance with anti-bribery laws, we will ensure a fair, transparent, and ethical conduct of business transactions by our staff, suppliers, and customers.

## PURPOSE OF THIS POLICY

The purpose of this Policy is to:

- Acknowledge and avoid the potential for criminal and civil penalties and serious reputational damage if the organisation is found to have been involved in bribery or corruption.
- Set out the responsibilities of employees to observe and uphold our position on acts of direct and indirect bribery,
- Provide a transparent framework for the procurement of products and services,
- Provide a mechanism to prevent and report suspected acts of bribery and corruption,
- Ensure thorough, objective, fair and independent investigation of any related disclosures,
- Ensure we comply with related elements of the Corporations Act 2001 and ASX Corporate Governance Principles and Recommendations.

## WHAT ARE ACTS OF BRIBERY

Bribery is an offence under both international and domestic laws, and Section 70 of the Criminal Code Act 1995 applies inside and outside Australia to all Australians and Australian Companies. Bribery includes:

- Paying secret commissions to people acting in an agency or fiduciary capacity,
- Offering improper payments or benefits to public officials,
- Providing, offering, or arranging a benefit to influence a decision maker, influence an outcome, obtain an advantage or retain business, or
- Receiving, asking or accepting a benefit in exchange for goods and services where that benefit is not legitimately due, and where
- A benefit refers to money, gift or anything of value in the form of fees, rewards or other advantage.



## **UNDER THIS POLICY EMPLOYEES MUST**

- Not give or accept gifts and/or benefits that will compromise or appear to compromise their integrity and objectivity in the performance of their duties,
- Not give or accept gifts and/or benefits that cause or appear to cause a conflict of interest, and
- Report gifts or benefits worth \$100 or more to their immediate manager, and
- Report any suspected bribery to their immediate manager, the HR Manager, Chief Financial Officer or a Director of the company.

## **ACCEPTABLE GIFT AND ENTERTAINMENT EXPENDITURE**

Gifts and business-related hospitality and entertainment expenditure that is reasonable and proportionate is allowable provided:

- It is clearly given as an act of appreciation or common courtesy associated with standard business practice,
- It does not place the recipient under any obligation,
- Expectations are not created by the giver or an associate of the giver,
- It is done openly,
- Its size is small and consistent with general business practice,
- Its nature is appropriate to the business relationship,
- It is provided on an “arm’s length” basis with no special favours or arrangements,
- It complies with relevant laws, and
- It is reported if the expense or gift is valued at \$100 or more.

Examples of gifts and entertainment that are not acceptable:

- Gifts in the form of cash or cash equivalent, such as gift vouchers or gift cards, and
- Exchanges to obtain special advantage not consistent with company practices and policies.

## **RELATED POLICIES**

This Policy works in conjunction with our Whistle Blowing and Dispute Resolution policies and our Organisational Values.

## **INVESTIGATING ACTS OF BRIBERY**

We will investigate allegations of bribery in a manner consistent with all relevant company policies having regard for confidentiality, procedural fairness, and just outcomes.