



ANTI BRIBERY & CORRUPTION POLICY

The Organisation and its officers have a zero-tolerance policy towards Bribery & Corruption. The organisation is committed to complying with the law and regulations of the countries in which its businesses operate and acting in an ethical manner, consistent with the principals of honesty, integrity, fairness & respect.

Bribery and the related improper conduct referred to in this policy are serious criminal offences for both the organisation and any individuals involved. They are also inconsistent with the Organisation's values.

Laws prohibiting the types of improper payments covered by this policy apply in all states the organisation engages in trading activities. As can be found in the Australian Criminal Code.

The purpose of this policy is to:

- Set out the responsibilities of the Organisation and its personnel in observing and upholding the prohibition on bribery and related improper conduct
- Provide information and guidance on how to recognise and deal with instances of bribery and corruption

The Organisation will regularly review the control measures to ensure they remain effective. Through the co-operative efforts of management and workers, we are committed to:

- Understanding and complying with this policy
- Not give, offer or accept or request bribes, facilitation payments, secret omissions or other prohibited payments or engage in money laundering or cause any of them to be given, offered, accepted or requested
- Not approve any offers, or make, accept, or request an irregular payment or other thing to value, to win business or influence a business decision in favour of the Organisation
- Comply with any reporting and approval process for gifts, entertainment, or hospitality
- Not offer or received any gifts, entertainment or hospitality to or from public or government officials or politicians, without approval from the relevant anti-bribery officer
- Obtain required approvals for donations and sponsorship
- Maintain accurate approvals for donations and sponsorship
- Maintain accurate records of dealings with third parties
- Be vigilant and report any breaches of, or suspicious behaviour related to, this policy



Michele Birtchnell

Director

on behalf of KTR Electronics Pty Ltd

Date: 2 June 2021

Review date: 2 June 2024