



Anti-Bribery, Gifts & Conflict of Interest Policy

Mercantile Group | Techmert Corporate Policy

Policy Owner	Effective Date	Next Review
Management	16-Jun-25	16-Jun-27

1. Purpose

This policy establishes controls designed to prevent bribery, secret commissions, improper influence and unmanaged conflicts of interest in commercial activities.

2. Scope

This policy applies to Mercantile Group Pty Ltd as trustee for Mercantile Group Trust, trading as Techmert (together, “Mercantile Group and Techmert”), including management, contractors, agents, suppliers and other business partners where relevant. Mercantile Group and Techmert currently operate without employees. Any reference in this policy to employees or workers applies only to supplier or contractor personnel, or to personnel engaged by Mercantile Group and Techmert in the future.

3. Zero Tolerance for Bribery

Mercantile Group and Techmert conduct business on an arm's-length basis. No person acting for or on behalf of Mercantile Group and Techmert may offer, promise, request, authorise or accept a bribe, kickback, secret commission or other improper benefit.

4. Gifts, Hospitality and Benefits

- Gifts, hospitality or benefits must be lawful, modest, infrequent and incapable of influencing, or appearing to influence, a business decision.
- Cash, cash equivalents, secret commissions and benefits linked to the award or retention of business are prohibited.
- Where there is doubt about whether a gift or hospitality is appropriate, it must not be offered or accepted until reviewed by management.

5. Conflicts of Interest

- Actual, potential or perceived conflicts of interest must be identified and disclosed to management.
- Where a customer, supplier or procurement process could be affected by a conflict, disclosure will also be made to the relevant party where appropriate or required.
- Past employment, personal relationships, financial interests or other connections must not be used to obtain an improper advantage.



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- A person with a material conflict may be excluded from the relevant decision, negotiation or approval process.

6. Confidential Information and Public Authorities

- Confidential customer, competitor, supplier or commercial information must not be misused for personal or improper commercial advantage.
- Political donations or interactions with public authorities must comply with applicable law and must not be used to obtain an improper advantage.

7. Reporting, Breaches and Records

- Concerns may be raised under the Grievance & Speak-Up Policy without retaliation for good-faith reporting.
- Breaches may result in corrective action, removal from a transaction, termination of supplier or contractor relationships, and referral to authorities where appropriate.
- Relevant disclosures, approvals and corrective actions will be recorded where appropriate.

Approval and Review

This policy is approved for use by Management on behalf of Mercantile Group and Techmert. It will be reviewed by the next review date shown above, and earlier where there is a material change in law, business activities, customer requirements, risk profile or supply-chain arrangements.

Where a customer, contract, purchase order, specification or site requirement imposes a higher standard, the applicable higher requirement will be reviewed and adopted where accepted as part of the engagement.