
ANTI-BRIBERY & ANTI CORRUPTION

What this policy covers

This policy applies to all workers and contractors at the Company.

This policy outlines the expectations of the Company.

The definition of bribery refers to the offering, giving, promising, asking, agreeing, receiving, accepting, or soliciting something of value or advantage to induce or influence an action or decision. A bribe refers to any inducement, reward, or object/item of value offered to another individual to gain commercial, contractual, regulatory, or personal advantage. Bribery is not limited to the act of offering a bribe. If an individual is on the receiving end of a bribe and accepts it, they are also breaking the law. Bribery is illegal.

Your responsibilities

Employees must not engage in any form of bribery, whether it be directly or passively (as described above). Furthermore, they must not accept bribes to any degree.

If they are uncertain about whether something is a bribe or a gift, or an act of hospitality, they must seek further advice from the Company's the Management Team.

The employee must tell the Management Team of First Fix Formwork Ltd as soon as possible if they are offered a bribe, if they have been asked to make a bribe, if they suspect that they may be bribed or asked to make a bribe in the near future, or if they have reason to believe that they are a victim of another corrupt activity.

What is and what is NOT acceptable?

Gifts and hospitality

First Fix Formwork Ltd accepts appropriate gestures of hospitality and goodwill (whether given to/received from third parties) so long as the giving or receiving of gifts meets the following requirements:

- It is not made to influence the party to whom it is being given, obtain or reward the retention of a business or a business advantage, or an explicit or implicit exchange for favours or benefits.
- It is not made with the suggestion that a return favour is expected.
- It complies with local law.
- It is given in the name of the Company, not in an individual's name.
- It does not include cash or a cash equivalent (e.g., a voucher or gift certificate).
- It is appropriate for the circumstances (e.g., giving small gifts around Christmas or as a small thank you to a company for helping with a large project upon completion).
- It is of an appropriate type and value and given at an appropriate time, considering the reason for the gift.
- It is given/received openly, not secretly.

- As good practice, gifts given and received should always be disclosed to the Management Team. In addition, gifts from suppliers should always be disclosed.
- The intention behind a gift being given/received should always be considered. If there is any uncertainty, the advice of the Management Team should be sought.

Facilitation Payments

A facilitation payment can take many shapes and forms, such as cash, gifts, vouchers, tickets, etc. ... Common examples are facilitation payments **demanded at border crossings**, where officials will hold up First Fix Formwork Ltd.'s cargo from entering a market until they receive payment.

Political Contributions

Before making a political contribution, the Company should carefully consider whether a member of the party, the politician, or the candidate for office to whom the donation is being made is, or may soon be, in a position to regulate the Company or evaluate a pending bid or proposal made by the Company. The Company should weigh these factors carefully when considering whether to make the donation. The Company must keep written records that properly account for all contributions, document the approval process, the type, and the amount of the contribution. Any political contribution should be made transparently and not anonymously.

Change emphasis of this paragraph from 'should' to 'will'. We aren't giving ourselves advice we are stating what we will do.

Charitable Contributions

The Company accepts the act of donating to charities – whether through services, knowledge, time or direct financial contributions (cash or otherwise) – and agrees to disclose all charitable contributions it makes. Employees must be careful to ensure that charitable contributions are not used to facilitate and conceal acts of bribery.

Protection

If an employee refuses to accept or offer a bribe, or they report a concern relating to potential act(s) of bribery or corruption, the Company understands that they may feel worried about possible repercussions.

The Company will support anyone who raises concerns in good faith under this policy, even if the investigation finds it mistaken.

The Company will ensure that no one suffers any detrimental treatment due to refusing to accept or offer a bribe or other corrupt activities or because they reported a concern relating to potential act(s) of bribery or corruption.

Detrimental treatment refers to dismissal, disciplinary action, threats, or unfavourable treatment in relation to the concern the individual raised. If you have reason to believe you have been subjected to unjust treatment because of a concern or refusal to accept a bribe, you should inform the Management Team immediately.

Record keeping

The Company will keep detailed and accurate financial records and have appropriate internal controls to act as evidence for all payments made.