



## Anti-bribery Corruption

### Policy

**POL-LGR-GPG-0002**

#### 1. Purpose

The purpose of this policy is to establish controls to ensure compliance with all applicable anti-bribery and corruption regulations, and to ensure that the Company's business is carried out with the highest level of integrity and ethical standards conducted in a socially responsible manner.

The objective of this policy is to provide a consistent standard of behaviour throughout the company and ensure that all personnel understand their obligations in respect of anti-bribery and corruption practices.

We will uphold all laws relevant to countering bribery and corruption in all in which we operate. However, we remain bound by the laws in Australia in respect of our conduct both at home and abroad.

This Anti-Bribery and Corruption Policy has been formally approved by the Board of Directors.

#### 2. Scope

Who is covered by the policy:

In this policy, third party means any individual or organisation you come into contact with during the course of your work for us, and includes actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies, including their advisors, representatives and officials, politicians and political parties.

This policy applies to all individuals working at all levels and grades, including senior managers, officers, directors, employees (whether permanent, fixed-term or temporary), consultants, contractors, trainees, seconded staff, homeworkers, casual workers and agency staff, volunteers, interns, agents, sponsors, or any other person associated with us, or any of our subsidiaries or their employees, wherever located (collectively referred to as employees in this policy).

This policy covers:

- Bribes,
- Gifts,
- Hospitality and Entertainment,
- Facilitation payments,
- Political contributions, and
- Charitable Contributions.



### 3. Bribes

Employees must not engage in any form of bribery, either directly or through any third party (such as an agent or distributor). Specifically, employees must not bribe a foreign public official anywhere in the world.

### 4. Gifts

The Company prohibits the giving and receiving of gifts in connection with the Company's operations where these go beyond common courtesies associated with general commercial practice. This is to ensure that the offer or acceptance of a gift does not create an obligation or cannot be construed or used by others to allege favouritism, discrimination, collusion, or similarly unacceptable practices by the Company.

If a member of the Company personnel is in any doubt as to whether a gift goes beyond general commercial practice, they should discuss this with their immediate manager.

### 5. Hospitality and Entertainment

Entertaining external business stakeholders is permitted where there is a justifiable business purpose for such expenses to be incurred on behalf of the Company. Valid entertainment expenses may include meals and events such as theatre, sporting events and other cultural events. The business purpose may be related to fostering the business relationship or be ancillary to a business discussion that takes place during, immediately before or immediately after the event.

The Company personnel must not make or accept invitations where the costs exceed the level of accepted common business courtesies, considering the location in which the entertaining takes place and what would be appropriate for the role and responsibilities within the organisation.

If there is any doubt as to whether an invitation exceeds the level of accepted business courtesies this should be discussed with their immediate manager.

### 6. Dealing with Government Officials including Facilitation Payments & Political Contributions

The provision of gifts or entertainment to a government official may be a legitimate and justifiable business activity in some circumstances; however, the practice has the potential to create the perception that the Company has sought to improperly influence the government official to achieve an improper advantage or obtain preferential treatment.

The offer, promise or giving of any gift, entertainment or other personal favour or assistance to a government official which might, regardless of value, be perceived as likely to improperly obtain/retain a business advantage, must be referred to the Managing Director in advance for approval.

The Company does not make political donations to any political party, politician, or candidate for public office in any country unless the donation has been approved in advance by the Board.

Attendance at party-political functions as a representative of the Company is permitted where there is a legitimate business reason. Attendance at these functions must be approved by the Managing Director.

#### Compliance with Laws and Regulations

Non-compliance with anti-bribery and corruption laws has potentially serious consequences for the Company and the personnel involved.

Applicable laws and regulations to which all Company personnel must comply include:

- Criminal Code Act 1995 (Cth)
- any other anti-corruption laws of the Commonwealth of Australia or any State or Territory of Australia (including any applicable common law, law of equity, any written law, statute, regulation, or other instrument made under statute or by any government agency), and
- any anti-corruption law of a country other than Australia which applies to the Company, its business partners or third parties operating on the Company's behalf

## 7. Charitable Contributions

Charitable support and donations are acceptable, whether in-kind services, knowledge, time, or direct financial contributions. However, employees must be careful to ensure that charitable contributions are not used as a scheme to conceal bribery.

The Company only makes charitable donations that are legal and ethical. In Australia, that means that an organisation must have deductible gift recipient status with the Australian Taxation Office.

This status makes the organisation entitled to receive income tax deductible gifts and deductible contributions.

No donation must be offered or made without the prior approval of the CEO.

## 8. Reporting Violations

Personnel who have witnessed, or who are aware of, any suspected bribery, corruption or any other conduct which does not comply with applicable laws and regulations must report it immediately in accordance with the Company's Whistle-blower Policy.

Any reports made will be treated in confidence and in accordance with the Company's POL-GPG-GPG-003-Whistleblower Policy.

The Company will not tolerate any form of harassment or retaliation against Personnel who make a report under this Policy.

The Board will be informed of incidents of bribery or corruption or any material breaches of this Policy.

## 9. Document Information

Company Details
GenusPlus Group Limited ACN 620 283 561 Adopted and approved by the Board on 14 October 2020

### 3.1 Document History

Rev	Date	Author	Approver	Details of Amendment
0	10/05/2019	CoSec	Board	Draft Issue
2	10/05/2019	CoSec	Board	Issued for Use
3	14/10/2020	DW	Board	Document review
4	15/12/2021	DW	Board	Annual review

### 3.2 Definitions & Abbreviations

Term	Definition
ASX	Australian Securities Exchange (ASX Limited)
GPG	GenusPlus Group Limited

### 3.3 References

References
Documents both internal and external that are referenced within the content of this policy, including Australian and International Standards and legislation. <ul style="list-style-type: none"> <li>Criminal Code Act 1995 (Cth)</li> </ul>

### 3.4 Related Documents

Related Documents				
<table border="1"> <tr> <td>POL-GPG-GPG-001</td> <td>Code of Conduct Policy</td> </tr> <tr> <td>POL-GPG-GPG-003</td> <td>Whistle-blower Policy</td> </tr> </table>	POL-GPG-GPG-001	Code of Conduct Policy	POL-GPG-GPG-003	Whistle-blower Policy
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