



**PPK GROUP LIMITED**  
**ACN 003 964 181**

## **BRIBERY AND CORRUPTION POLICY**

### **1. PURPOSE OF THE POLICY**

- 1.1 The purpose of this Policy is to set out the controls PPK Group Limited (“Company”) has established to ensure compliance with all applicable anti-bribery and corruption regulations, and to ensure that the Company’s business is conducted in a socially responsible manner.

### **2. POLICY STATEMENT**

- 2.1 Bribery is offering, promising, giving, accepting or soliciting of an advantage as an inducement for action which is illegal or a breach of trust. A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage.
- 2.2 As stated in the Company’s Code of Conduct, it is the Company’s policy to conduct all its business in an honest and ethical manner and it takes a zero-tolerance approach to bribery and corruption. The Company is committed to acting professionally, fairly and with integrity in all its business dealings and relationships by implementing and enforcing effective systems to counter bribery.
- 2.3 The Company will uphold all laws relevant to countering bribery and corruption in Australia.

### **3. BRIBES, CHARITABLE CONTRIBUTIONS, GIFTS AND HOSPITALITY**

- 3.1 Personnel must not engage in any form of bribery, either directly or indirectly.
- 3.2 Charitable support and donations are acceptable (and indeed are encouraged), whether of knowledge, time, or direct financial contributions. However, personnel must be careful to ensure that charitable contributions are not used as a scheme to conceal bribery.
- 3.3 Personnel must not offer or give any gift or hospitality:
- 3.3.1 which could be regarded as illegal or improper, or which violates the recipient’s policies or
  - 3.3.2 to any public employee or government officials or representatives.
- 3.4 Employees may not accept any gift or hospitality from any business associates unless previously authorised by one of the directors.

### **4. YOUR RESPONSIBILITIES**

- 4.1 You must ensure that you read, understand and comply with this Policy. The prevention,

detection and reporting of bribery and other forms of corruption are the responsibility of all employees.

4.2 All employees are required to avoid any activity that might lead to, or suggest, a breach of this Policy. You must notify your manager as soon as possible if you believe or suspect that a conflict with or breach of this policy has occurred or may occur in the future.

4.3 Employees who breach this policy will face disciplinary action, which could result in dismissal for gross misconduct. The Company reserves its right to terminate any contractual relationship with its personnel if they breach this Policy.

## **5. HOW TO RAISE A CONCERN**

5.1 You are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. If you are unsure whether a particular act constitutes bribery or corruption, or if you have any other queries or concerns, these should be raised with your manager.

## **6. WHAT TO DO IF YOU ARE A VICTIM OF BRIBERY OR CORRUPTION**

6.1 It is important that you tell your manager as soon as possible if you are offered a bribe by a third party, are asked to make one, suspect that this may happen in the future, or believe that you are a victim of another form of unlawful activity.

## **7. PROTECTION**

7.1 Personnel who refuse to accept or offer a bribe, or those who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

7.2 We are committed to ensuring no one suffers any detrimental treatment because of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion that an actual or potential bribery or other corruption offence has taken place or may take place in the future.

## **8. TRAINING AND COMMUNICATION**

8.1 Training on this Policy forms part of the induction process for all new employees. All existing employees will receive regular and relevant training on how to recognise and deal with bribery and corruption.

## **9. WHO IS RESPONSIBLE FOR THE POLICY**

9.1 The Company's Board has overall responsibility for ensuring this Policy complies with the Company's legal and ethical obligations, and that all personnel comply with it.

9.2 The Company's Board will be promptly informed of any material incidents reported under this Policy.

9.3 The Policy will be periodically reviewed to ensure that it is operating effectively and whether any changes are required.

Adopted: December 2021