



# EVZ LIMITED ANTI-BRIBERY & CORRUPTION POLICY

SEPTEMBER 2022

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## 1. Introduction and Purpose

To ensure that the Company is in compliance with international regulations with regards to anti-corruption and bribery issues it is committed to conducting all business dealings legally, ethically and fairly while also striving to maintain the highest standards of integrity and honesty.

In order to avoid exposure to potential conflicts of interest the Company has an open and transparent management approach.

The Company does not seek to win or retain business through any illegal or corrupt means, and all transaction and contract related payments, including those in connection with gifts and other expenditures, are recorded in detail.

The Company has adopted this policy to prohibit inappropriate conduct associated with bribery and corruption.

## 2. Responsibility for Compliance

The following are personally responsible for complying with this ABC Policy and all applicable laws and regulations worldwide:

- All directors, senior executives and employees of the Company (Personnel)
- Consultants, contractors and other representatives of the Company (Contracted third parties)

Any conflict between this ABC Policy and the law is to be referred to the relevant person to deal with this policy, Compliance Officer.

## 3. What is Bribery and Corruption?

Bribery is the act of offering, promising, giving or accepting a benefit with the intention of influencing a person who is otherwise expected to act in good faith or in an impartial manner, to do or omit to do anything in the performance of their role or function, in order to provide EVZ Group with business or a business advantage that is not legitimately due. The relevant laws apply to bribery of public officials as well as bribery in respect of any commercial transaction in the private sector. Merely offering a bribe will usually be sufficient for an offence to be committed.

Bribery can take many forms. The benefit that is offered, given or accepted may be monetary or non-monetary. For instance, it may involve non-cash gifts, political or charitable contributions, loans, reciprocal favours, business or employment opportunities or lavish corporate hospitality. Corruption involves an abuse of power for personal gain or advantage for an entity.

Bribery and corruption are known as Improper Acts.

#### **4. Improper Acts and Other Unfair Dealings**

Personnel and Contracted Third Parties are prohibited from conducting any improper acts anywhere in the world. Personnel and Contracted Third Parties may also be personally liable and exposed to criminal and civil liability if they engage in any improper acts.

Personnel and Contracted Third Parties will make a clear distinction between the interests of the Company and private interests and will avoid conduct that would expose Personnel and / or Contracted Third Parties to possible conflicts of interest. Personnel and Contracted Third Parties will not misuse privileged information, misrepresent information, or conduct other unfair acts.

#### **5. Safety and Liberty Exception**

In the event that any Personnel or Contracted Third Parties experience a threat to the safety or liberty of a person, they are not required to comply with this Policy. Such Personnel and Contracted Third Parties must immediately or as soon as reasonably possible after the event provide a detailed report of what occurred to the relevant Compliance Officer.

#### **6. Facilitation Payments and Money Laundering**

The making of 'facilitation payments' either directly or indirectly through agents, contractors or intermediaries by Personnel and Contracted Third Parties is prohibited unless permitted by law in the relevant jurisdiction in which the Company is operating. A facilitation payment could be a minor, unofficial payment to a public official in order to expedite a routine government action by a public official.

A public official includes anybody who has any official or representative capacity in any part of any government (whether national, state/ provincial, or local) or any regulatory entities and includes anybody who holds themselves out to have such capacity.

Money laundering by Personnel and Contracted Third Parties is also prohibited. Money laundering broadly involves the act of concealing or attempting to conceal illegal funds and disguising the funds to give the appearance that they are legitimately obtained.

#### **7. Gifts and Entertainment**

The Company recognises that offering or accepting gifts and entertainment by Personnel and Contracted Third Parties which are of moderate value and proportionate are generally considered to be in accordance with business practice and maintaining good business relationships, for example, meals and theatre, sporting, and cultural events. However, the



exchange of gifts and entertainment may give rise to conflicts between the personal interests of Personnel and Contracted Third Parties and the interests of the Company.

Personnel and Contracted Third Parties are prohibited from offering or accepting gifts or entertainment in circumstances which could give rise to or appear to give rise to. Improper Acts and must always consider this ABC Policy when gifts or entertainment are offered.

Personnel and Contracted Third Parties must always ensure that any gifts or entertainment offered, given or accepted, are proportionate and in line with the laws and common business practice of the location where the gift or entertainment occurs.

We are to ensure that all gifts and entertainment given to or received from Contracted Third Parties are approved by management. It is the Company's policy that gifts or entertainment with a value exceeding AUD\$250 per person must not be offered, given or accepted by Personnel and Contracted Third Parties without the prior reporting to the Compliance Officer and approval of a director.

Personnel and / or Contracted Third Parties who offer, give or receive a gift or entertainment which has a value over AUD\$100 must immediately report it to the finance team so that such gifts or entertainment can be recorded in the Gifts and Entertainment Register. The Chief Financial Officer (CFO) will regularly review the register.

## **8. Charitable Contributions, Sponsorship and Political Donations**

The Company does not make political donations in any country. Apart from political donations, Personnel and / or Contracted Third Parties must not make or offer any charitable contribution, donation, or sponsorship (including, for example, community investment projects) on behalf of the Company without prior approval from the CEO, CFO or a director. All donations greater than AUD\$500 will be recorded on the Contributions Register.

## **9. Record Keeping**

All transactions, including evidence of permitted travel, hospitality, entertainment, gifts or any other expenses, incurred by Personnel and / or Contracted Third Parties must be appropriately recorded in the Company's books and records.

## **10. Contracted Third Parties**

The Company expects Contracted Third Parties will avoid Improper Acts and act legally and ethically in all their dealings (and not just dealings involving the Company). Contracted Third Parties are also prohibited from accepting secret commissions, being 'kick-backs' received by a Contracted Third Party related to Company business.

Personnel will ensure that Contracted Third Parties are made aware of and know the standards the Company expects and commits to maintain.

Contracted Third Parties must be made aware of, and agree in writing to comply with, this Policy and the Company's Code of Conduct. Appropriate due diligence must be conducted in relation to Contracted Third Parties and agents and should be recorded in writing in suitable detail.

## 11. Training

All relevant Personnel and Contracted Third Parties are to receive appropriate training, including refresher training, relating to this Policy and related policies and procedures. Any newly hired senior executives and employees will receive such training as part of their induction.

The extent and nature of such training shall be defined by reference to their function and will reflect the risks facing an employee in their role.

Records of all completed training sessions undertaken by Personnel are maintained by the relevant Compliance Officer.

## 12. How to Raise a Concern

Personnel are encouraged to speak up if they suspect any actual, planned, or potential Improper Acts or unfair dealings. Any questions or concerns about this Policy or actual or suspected breaches of this Policy should be directed to the relevant Company Secretary, or the Chief Executive Officer as follows:

EVZ Company Secretary Pieter van der Wal	Phone: 03 9545 5288 Email: <a href="mailto:pieter.vanderwal@evz.com.au">pieter.vanderwal@evz.com.au</a>
EVZ Chief Executive Officer Scott Farthing	Phone: 03 9545 5288 Email: <a href="mailto:scott.farthing@evz.com.au">scott.farthing@evz.com.au</a>

Reports may also be made via the Company's Whistle Blower Policy, a copy of which is on the Company's website.

## 13. Consequences of Breaching this Policy

The Compliance Officer shall investigate any reported breaches or potential breaches of this Policy. The Compliance Officer is ultimately responsible for determining the validity of each report, concern or complaint and fashioning, with the input of its advisors and the Company's management, if requested, the appropriate corrective action. The Compliance Officer shall report any legal or regulatory non-compliance they consider a material concern to the Company's Board of Directors and ensure that management takes corrective action including, where appropriate, obtaining external legal advice and, if so advised, reporting any violation to

relevant governmental authorities. Breach of this Policy by any Personnel and / or Contracted Third Parties will be regarded as serious misconduct. Personnel and / or Contracted Third Parties may be subject to disciplinary action, which may include termination of employment. In addition to breaching this Policy, Personnel and / or Contracted Third Parties may be exposed to personal liability or criminal liability at law if they engage in any Improper Acts that are illegal. Where possible, the Company will seek to terminate its relationship with any Contracted Third Parties if it is determined that such Contracted Third Parties has failed to comply with this Policy. This Policy will be reviewed regularly to ensure its relevance to the ever-changing environment.

#### 14. Compliance with Anti-Bribery and Corruption policy

Compliance with anti-bribery and corruption policy is mandatory.

EVZ is committed to ensuring EVZ's directors, senior executives, employees, and consultants can raise concerns regarding illegal conduct, malpractice or breach of policy in good faith without being subjected to victimisation, harassment or discriminatory treatment, and to have such concerns properly investigated.

Breaches of the anti-bribery and corruption policy may be reported via the EVZ whistle blower program. A copy of the whistle blower policy is available on the company website: <http://www.evz.com.au>

All reports will be dealt with in the strictest of confidence

Version	Date Amended / Released	Amendments
1.0	12 December 2019	Initial Version
1.1	1 September 2022	Reformat
1.2	2 September 2022	Clause 12 amended

