



Hardcat Pty Ltd Anti-Bribery & Corruption Policy

Zero-tolerance approach to bribery and Corruption.

V1.0 8 April, 2022



What is the purpose of this policy?

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 conducted in a socially responsible manner. (<https://www.hardcat.com/about-us/>).

Who this policy applies to?

This policy applies to you if you are involved in our business, including if you are an employee, director, officer, labour hire staff, contractor or other representative of our business or of any business in our supply chain.

While this policy is not part of any contract you may have with us, you are expected to comply with it.

If you do not comply with this policy, we may end our business relationship with you and if you are an employee, you may be disciplined or dismissed.

Policy Statement:

Bribery is the 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.

It is our policy to conduct all of our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption. We are committed to acting professionally, fairly and with integrity in all our business dealings and relationships by implementing and enforcing effective systems to counter bribery.

We will uphold all laws relevant to countering bribery and corruption in Australia.

What are indicators of modern slavery practices?

Modern slavery indicators may include where a person:

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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, business contacts, agents, and government and public bodies.

This policy applies to all employees and contractors engaged by Hardcat Pty Ltd, collectively referred to as personnel.

This policy covers:

- Bribes
- Gifts and hospitality
- Charitable contributions

Bribes

Personnel must not engage in any form of bribery, either directly or indirectly.

Gifts and hospitality

Personnel must not offer or give any gift or hospitality:

- which could be regarded as illegal or improper, or which violates the recipient's policies or
- to any public employee or government officials or representatives.

Employees may not accept any gift or hospitality from any business associates unless previously authorised by one of the directors.

Charitable contributions

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.

Your responsibilities

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 those working for the Hardcat Pty Ltd.

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.

Personnel who breach this policy will face disciplinary action, which could result in dismissal for gross misconduct. We reserve our right to terminate our contractual relationship with other workers if they breach this policy.

How to raise a concern

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

What to do if you are a victim of bribery or corruption

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.

Protection

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.

We are committed to ensuring no one suffers any detrimental treatment as a result 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.

Training and communication

Training on this policy forms part of the induction process for all new employees. All existing employees will receive regular, relevant training on how to implement and adhere to this policy. In addition, all employees will be asked to formally accept conformance to this policy on an annual basis. Our zero-tolerance approach to bribery and corruption must be communicated to all suppliers, contractors, and business partners at the outset of our business relationship with them and as appropriate thereafter.

Who is responsible for the policy?

The Board of Directors have overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all personnel comply with it.

The Chief Financial Officer has primary and day-to-day responsibility for implementing this policy, and for monitoring its use and effectiveness and dealing with any queries on its interpretation.

Monitoring and review

The Chief Financial Officer will monitor the effectiveness and review the implementation of this policy, regularly considering its suitability, adequacy, and effectiveness. Any improvements identified will be made as soon as possible. Internal control systems and procedures will be subject to regular audits to provide assurance that they are effective in countering bribery and corruption.

All personnel are responsible for the success of this policy and should ensure they use it to disclose any suspected danger or wrongdoing.

Personnel are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions, and queries should be addressed to the Chief Financial Officer.

The policy may be amended, replaced, or removed and the current version can be found here: <https://www.hardcat.com/about-us/>.