

# Australian United Investment Company Limited

## Anti-Bribery and Corruption Policy

### Objective

Australian United Investment Company Limited (the Company) takes a zero-tolerance approach to bribery and corruption and is committed to conducting business with integrity and high ethical standards. Bribery and corruption are a breach of the Company's Code of Conduct and will not be tolerated.

This policy is to establish controls to ensure compliance with all applicable anti-bribery and corruption regulations, and to ensure the Company's employees and Directors understand the importance of operating in a workplace free of bribery and corruption and are aware of their rights and responsibilities in relation to it.

### Guidelines

#### Bribes

The Company's employees and Directors are not permitted to give, offer, promise, accept, request or authorise a bribe, to or from any person in order to influence them corruptly or improperly in the exercise of their duty.

#### Gifts and Hospitality

Giving and receiving gifts or hospitality is a normal and important part of developing and maintaining business relationships. However, all gifts and hospitality should be reasonable and given in the ordinary course of business.

Lavish or unreasonable gifts or hospitality, whether these are given or received, are unacceptable and can create the impression of trying to obtain or receive favourable business treatment by providing individuals with personal benefits.

Employees and Directors must declare and report gifts and/or benefits, either offered or accepted and valued at \$250 or more, in the Gift and Entertainment Register held by the Company Secretary.

Non-executive Directors should seek approval from the Chairman on any Company-related hospitality, such as conferences or attendance at meals, cultural and sporting events, with an estimated value greater than \$250 and offered to them in their capacity as Directors of the Company.

The Chairman should seek approval from the Chairman of the Audit and Risk Management Committee on any Company-related hospitality offered to him with an estimated value of greater than \$250. Any hospitality with an estimated value of greater than \$250 will be submitted to the Company Secretary to be recorded in the Gifts and Entertainment Register.

#### Facilitation Payments

Facilitation payments are payments, no matter how small, given to an official to increase the speed at which they do their job. All facilitation payments are prohibited.

## Political Contributions and Donations

The Company does not make contributions or donations to political parties.

Attendance at party-political functions is permitted where there is a legitimate business reason. The Chairman must approve attendance at these functions at which the Director or employee is attending in that capacity.

## Charitable Contributions

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

The Company only makes charitable donations that are legal and ethical under local laws and practices. In Australia, this 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.

## Insider Trading

In addition to general obligations to observe the law, one of the most important responsibilities of all employees and Directors is to protect the Company's reputation for ethical and honest dealing.

The Company's reputation could be irreparably damaged if inside information is inappropriately disclosed such that it affects the stock price of the Company or that of any other company with whom it has a relationship. Directors and employees are forbidden from sharing or disclosing Company information in any way that could be deemed insider trading or give the appearance of such conduct.

## Consequences

Any breach of this policy is a serious matter which will be investigated and addressed by the Company.

Disciplinary action will be taken against any individual who breaches this policy. Disciplinary action will depend on the severity of the breach but may include reprimands, formal warnings, demotions or dismissal.

Matters may also, depending on the circumstances, be referred to the police and result in fines, criminal convictions or jail.

## Reporting Concerns

The Company is committed to ensuring that employees can speak up with confidence if they have any concerns or need to ask for help. Concerns with or suspicion of bribery and / or corruption should be raised with the employee's manager or reported under the Company's Whistleblower policy.

## Record-keeping

All financial transactions must be recorded accurately, completely and fairly in accordance with the Companies' internal accounting controls. Books and records must include, in reasonable detail, the parties, payment arrangements and purpose of all transactions and disposition of assets. No accounts are to be kept 'off the books' for any reason.

**Monitoring of Policy**

The Gift and Entertainment Register will be provided at each Audit and Risk Management Committee meeting of the Company. The Company Secretary will regularly monitor the effectiveness and implementation of this policy and the Gift and Entertainment Register to identify and manage any emerging risks.

**Policy Review**

This Policy will be reviewed annually by management and every three years by the Board, unless there are material changes proposed by management which require approval by the Board.