

EMPLOYEE POLICY

ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

GLOBAL

ID: A1919436

Version: 1.0

Date: 3/09/2020

TABLE OF CONTENTS

- 1. POLICY GOAL 3
- 2. ELIGIBILITY 3
- 3. ANTI-BRIBERY AND ANTI-CORRUPTION POLICY 3
 - 3.1 Crimes 4
 - 3.2 Sponsorships, Donations and Engagements 4
- 4. ACTION WE MAY TAKE 5
- 5. STATUS OF THIS PROCEDURE 5

1. POLICY GOAL

Objective is committed to operating its business ethically and living our values and complying with our legal obligations. This policy provides you with clarity about how to act ethically, honestly, transparently and in a trustworthy manner in all your deals at and for Objective.

Objective will publish this policy as part of our People & Culture Policies so that it will be accessible to you at all times.

Objective will also reasonably regularly publicise the existence of the policy to all employees and officers in our Australian locations.

2. ELIGIBILITY

This policy applies to all employees, contractors, directors and officers, in Objective's locations around the world on and from 31 December 2019.

3. ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

Objective strictly prohibits the following:

- bribes
- payoffs
- kickbacks
- improper benefits
- secret, unjustified or inflated commissions
- payments characterised as 'facilitation payments' for the purpose of speeding up routine activities or extending the delay of routine deferrals
- any similar types of rewards

no matter how large or small the value, whether received directly or indirectly and whether international (i.e. cross-border) or local.

The prohibition applies whether or not the activity is considered common or usual in the location where it takes place.

The prohibition applies to offering as well as accepting any of the above. That means:

- you must not offer any bribes, pay-offs, kickbacks, improper benefits, secret, unjustified or inflated commissions, 'facilitation payments' or other rewards to any entity or person in connection with your work at or for Objective; and
- you must not accept any of those things from any entity or person either.

If you are ever:

- asked by any entity or person to make or arrange a prohibited payment related to Objective you must politely decline saying "*I have no authority to make such an offer to you*" or words to that effect;
- offered, directly or indirectly, a prohibited payment related to Objective by any entity or person you must politely decline saying "*I have no authority to receive such an offer from you*" or words to that effect.

and you must promptly notify your manager as soon as possible about the prohibited activity.

Managers who become aware of prohibited activity under this policy must notify Objective's Chief Financial Officer and Chief Executive Office, both of whom work from Objective's North Sydney offices.

If you are aware that any employee, contractor, director or officer of Objective is engaging in any prohibited activity you must report it – please review Objective's Whistleblower Policy for your office.

3.1 Crimes

Bribery and corruption, particularly of public or government officials, are illegal activities according to the laws in place where each Objective office is located.

No person covered by this policy is authorised or otherwise permitted by Objective to engage in illegal behaviour as part of their work for Objective.

All persons covered by this policy who do engage in any illegal will be doing so outside the terms of their employment or engagement at Objective, which means they will face personal liability which may include fines or imprisonment.

Bribery and corruption attract substantial penalties because they are serious and unacceptable behaviours. Objective will not tolerate them.

3.2 Sponsorships, Donations and Engagements

When Objective sponsors any specific activity (such as sponsoring a conference) or donates to any formal cause (such as donations to the NSW Rural Fire Service) or formally engage a service provider to perform services for us

(such as engaging businesses to act as 'spotters' for new business opportunities) it does so in a legal manner, transparently using written contracts and we record the transactions in our financial accounts.

Formal, transparent and recorded sponsorships, donations and services engagements are not prohibited activities under this policy.

4. ACTION WE MAY TAKE

Any person covered by this policy who engages in any of the prohibited activities will face disciplinary action which may include termination of employment or engagement.

If you break any laws you will be personally liable and may face fines or imprisonment.

5. STATUS OF THIS PROCEDURE

The company reserves the right to alter any of its terms at any time in accordance with obligations of compliance with the law, although we will notify you in writing of any changes.