

ANTI-BRIBERY AND CORRUPTION POLICY

Document No.:	03-12-PCY-043_Rev1_Anti-Bribery and Corruption Policy
Issue Date:	
Revision No.:	1
Pages	1 of 4

1	07/09/2023	Review	N. Kerrisk	L.Lesmeister	M. Hagen	10/11/2024
Rev	Date	Issued For	Originator	Reviewed	Approved	Next Review

ANTI-BRIBERY AND CORRUPTION POLICY

PURPOSE OF POLICY

It is EDMS Australia's policy to conduct all business activities in an honest and ethical manner. EDMS Australia is committed to ensuring compliance with all applicable anti-bribery and corruption regulations, and to ensure that the Company's business is conducted in a socially responsible manner.

This policy applies to all existing and prospective full-time, part-time, and casual employees, a person conducting a business or undertaking, directors, office workers, as well as all agents and contractors (including contractors or subcontractors) of EDMS, engaged from time to time, collectively referred to in this policy as "workplace participants."

WHAT IS BRIBERY

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.

SCOPE

This policy applies to:

- a. Directors.
- b. Senior managers.
- c. Fulltime, part time, casual and temporary working participants.
- d. Apprentices.
- e. Trainees.
- f. Interns.
- g. Job Candidates.
- h. Work experience students.
- i. Contractors.
- j. Sub-contractors.
- k. Clients of EDMS Australia.
- l. Suppliers.
- m. Third parties, not mentioned above.

ANTI-BRIBERY AND CORRUPTION POLICY

This policy covers:

- a. Bribes.
- b. Gifts and hospitality.
- c. Charitable contributions.

BRIBES

EDMS Australia workplace participants and associates must not engage in any form of bribery, either directly or through any third party. Specifically, personnel associated with EDMS Australia, must not bribe a foreign public official anywhere in the world.

GIFTS AND HOSPITALITY

EDMS Australia workplace participants must not offer any of the following in the form of gift or hospitality:

- a. Which could be regarded as illegal or improper, or which violates the recipients policies.
- b. To any public employee or government officials or representatives, or politicians or political parties.

Workplace participants may not accept any gift or hospitality from our business partners if:

- a. There is any suggestion that a return favour will be expected or implied.

CHARITABLE CONTRIBUTIONS

Charitable support and donations are acceptable. Donations can be in-kind services, knowledge, time or direct financial contributions. No donation shall be offered or made without the prior approval of the manager. Ensure that charitable contributions are not used as a scheme to conceal bribery.

RESPONSIBILITIES

The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for us or under our control. All workplace participants are required to avoid any activity that might lead to, or suggest, a breach of this policy.

ANTI-BRIBERY AND CORRUPTION POLICY

BREACH OF THIS POLICY

Any workplace participants who breaches this policy may be subjected to disciplinary action for serious misconduct in accordance with the Conduct and Performance Policy. Agents or contractors of EDMS Australia who are found to have breached this policy, may have their contracts with EDMS Australia terminated.

RAISING CONCERNS

You are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. If you are unsure what constitutes bribery or corruption, you can raise the issue with your manager or the managing director.

It is important that you notify your manager or the managing director as soon as possible if you are offered a bribe, are asked to make a bribe, suspect a bribe, or believe you are a victim of unlawful activity.



Michael Hagen
Director
EDMS Australia

Date: 10/11/2023