



## Anti-Bribery and Corruption Policy

### 1. POLICY STATEMENT

Greatland is committed to conducting all business in an honest and ethical manner. Greatland has a zero-tolerance approach to bribery and corruption and is committed to acting professionally, fairly and with integrity in all business dealings.

Greatland seeks to uphold all laws relevant to countering bribery and corruption in the jurisdictions in which it operates. In addition, Greatland remains bound by the laws of the United Kingdom, including the Bribery Act 2010, in respect of conduct both in the UK and abroad.

The purpose of this Policy is to set out the responsibilities of Greatland's employees, directors and contractors in observing and upholding the prohibition on bribery, corruption and other related improper conduct.

### 2. THE SCOPE OF THIS POLICY

This Policy set out the responsibilities of employees, directors and contractors of Greatland and its controlled subsidiaries. The prevention, detection and reporting of bribery and other forms of related improper conduct is the responsibility of all Greatland staff.

### 3. WHAT IS BRIBERY

A bribe is an inducement or reward offered, promised, or provided to gain any commercial, contractual, regulatory or personal advantage.

#### Examples:

#### Offering a bribe

You offer a potential client a ticket to a major sporting event, but only if they agree to do business with us.

This would be an offence as you are making the offer to gain a commercial and contractual advantage. Greatland and the individual may be found to have committed an offence because the offer has been made to obtain business for the Company. It may also be an offence for the potential client to accept the offer.

#### Receiving a bribe


A supplier gives your nephew a job but makes it clear that in return they expect you to use your influence in Greatland to continue to do business with them.

It is an offence for a supplier to make such an offer. It would be an offence for you to accept the offer as you would be accepting the offer to gain a personal advantage.

#### Bribing a foreign official

You arrange for the Company to pay an additional payment to a foreign official to speed up an administrative process, such as clearing goods through customs.

The offence of bribing a foreign public official has been committed as soon as the offer is made. Greatland and the individual may be found to have committed an offence.

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#### 4. GIFTS AND HOSPITALITY

In this Policy, Third Party refers to any individual or organisation encountered during your work for Greatland, including, but not limited to actual and potential clients, shareholders, customers, suppliers, distributors, business contacts, joint venture partners, agents, advisers, traditional land owners, government and public bodies, including their advisors, representatives and officials, politicians, and political parties.

This Policy does not prohibit normal and appropriate hospitality and seasonal gifts (given and received) to or from Third Parties.

The giving or receipt of gifts is not prohibited, if the following requirements are met:

- It is not made with the intention of influencing a Third Party to obtain or retain business or a business advantage, or to reward the provision or retention of business or a business advantage, or in explicit or implicit exchange for favours or benefits.
- It complies with applicable law.
- It is given in the Company's name, not your own name.
- It does not include cash or a cash equivalent (such as gift certificates or vouchers).
- It is appropriate in the circumstances.
- Considering the reason for the gift, it is of an appropriate type and value and given at an appropriate time.
- It is given openly, not secretly.
- Gifts should not be offered to, or accepted from, government officials or representatives, or politicians or political parties, without prior approval.

#### 5. DONATIONS


Donations or contributions to political parties should receive prior approval by the CFO, who will act on the direction of the Board of Directors with respect to political parties.

Charitable donations may be approved jointly by the Managing Director and CFO.

#### 6. WHAT IS NOT ACCEPTABLE

It is not acceptable for you (or someone on your behalf) to:

- Give, promise, or offer, a payment, gift or hospitality with the expectation that a business advantage will be received, or to reward a business advantage already given.
- Give, promise, or offer, a payment, gift or hospitality to a government official, agent or representative to 'facilitate' or expedite a routine procedure.
- Accept payment from a Third Party that you know, or suspect is offered with the expectation that it will obtain a business advantage for them.
- Accept a gift or hospitality from a third party if you know or suspect that it is offered with an expectation that a business advantage will be provided by us in return.
- Threaten or retaliate against another worker who has refused to commit a bribery offence or who has raised concerns under this Policy.
- Engage in any activity that might lead to a breach of this Policy.

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## 7. REPORTING THRESHOLD

All gifts, entertainment or hospitality provided greater than the Reporting Threshold must be captured on a register maintained by the CFO and approved by the Managing Director and CFO.

Amounts individually or in combination where provided as a package exceeding:

- Political Donations made by Greatland >AUD \$0
- Charitable donations and sponsorship made by Greatland >AUD\$2,500
- Gifts, entertainment or hospitality received from a Third Party >AUD\$1,000
- Gifts, entertainment or hospitality provided to a Third Party >AUD\$500

## 8. WHAT TO DO IF YOU ARE THE VICTIM OF BRIBERY OR CORRUPTION


It is important that you immediately advise the Company Secretary as soon as possible if you are offered a bribe by a Third Party or 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.

## 9. PROTECTION

Workers who refuse to accept or offer a bribe, or those who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. Greatland aims to encourage openness and will support anyone who raises genuine concerns in good faith under this Policy.

## 10. CONTACTS

You must notify the Company Secretary or the relevant contact under the Company's Whistleblowing Policy should you observe or suspect any activity which may be a breach of this Policy.

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