

# Anti-bribery and Corruption Policy



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## Relevant Company

Advanced Braking Technology Limited

Advanced Braking Pty Ltd

All companies collectively referred to as “ABT” or “Advanced Braking Technology.”

## Purpose

Advanced Braking Technology has a zero-tolerance approach to bribery and corruption and is committed to conducting its operations and business activities with integrity and preventing bribery or corruption by any of its directors, officers, employees or any other party acting on its behalf.

The purpose of the Anti-Bribery and Corruption Policy (**the Policy**) is to:

- supplement ABT’s Code of Conduct by setting out the conduct expected by ABT to minimise the risk of bribery or corruption occurring in connection with its operations and activities;
- further reinforce ABT’s values; and
- provide guidance to those working for ABT on how to recognise and deal with bribery and corruption issues.

## 1. Scope

This policy applies to all individuals working at all levels, including all directors, senior managers, officers, employees (whether permanent, fixed-term or temporary), consultants, contractors, service providers and third party agents or any other person associated with ABT, or any of ABT’s subsidiaries or their employees, wherever located (collectively referred to as **Employees** in this

policy).

ABT expects that all employees will comply with the law and apply the same or materially similar standards detailed in this Policy. This policy may be amended or replaced at the discretion of ABT or otherwise required by law.

## 2. Policy Statement

Advanced Braking Technology is committed to countering bribery and corruption in all forms. ABT does not tolerate any form of bribery and corruption, and will treat potential instances of bribery or corrupt behaviour as a threat to ABT's reputation and integrity as a business. In accordance with these commitments and to support a culture of compliance, ABT has developed this Policy.

### 2.1 What is bribery and corruption

Bribery and corruption in any form are strictly prohibited. Serious criminal and civil penalties, as well as reputational damage, may be incurred if ABT or an employee of ABT is involved in bribery or corruption.

Bribery involves improperly offering or providing a benefit or something of value to a public official, someone in business, a close relative of such a person or, in certain countries, a corporate entity in order to improperly obtain or retain business or an advantage or to induce or reward improper conduct or an improper decision. While a bribe may involve a monetary payment or offer, it covers anything of value such as:

- cash or cash equivalents (e.g. gift vouchers or loans);
- some gifts, hospitality, entertainment or travel;
- donations or scholarships;
- offers of employment;
- the provision of favours (e.g. discounted or 'free' ABT product or use of ABT's facilities or property);
- training; or
- anything else that is of value to the recipient.

Corruption is a deliberate act of dishonesty, breach of the law, or abuse of public trust or power that undermines or is incompatible with the impartial exercise of an official's powers, authorities, duties or functions for private gain. An Employee of ABT, under no circumstances, is permitted to engage in

corruption, whether directly or indirectly.

## 2.2 Policy requirements

An Employee of ABT must **never**:

- pay, offer, promise or accept, directly or indirectly, any bribe, kickback, secret commission or other form of improper payment in order to obtain any improper business or other advantage for ABT, for themselves, or for others;
- give, pay, offer, pay or give anything of value to a public official in order to obtain business or anything of benefit to ABT. 'Public official' should be understood very broadly, and this means anyone paid directly or indirectly by the government or performing a public function, including officials of state-owned enterprises and public international organisations;
- make facilitation payments. Facilitation payments are payments (typically of low value) made to a public official with the purpose of expediting or facilitating the performance of a routine governmental action;
- provide, promise or accept benefits including gifts, entertainment, meals, travel/accommodation, training or other things of value which are contrary to the Policy;
- engage or make a payment to any third party, knowing or suspecting the third party may use or offer all or a portion of the payment directly or indirectly as a bribe, kickback, secret commission or other form of improper payment;
- hire an agent, consultant or other intermediary if they have reason to suspect that they will pay bribes on behalf of ABT; or
- prepare false, misleading, incomplete or inadequate accounting books or records.

ABT employees must not do any of the above in their 'personal capacity' in an attempt to evade the requirements of this Policy.

No ABT employee will be penalised, or be subject to other adverse consequences, for refusing to pay bribes or engage in any other conduct which would be a breach of this Policy.

## **2.3 Gifts, Entertainment and other benefits**

ABT does not permit the exchange of gifts or involvement in hospitality activities that is beyond general commercial practice or that occurs in circumstances that could be considered to give rise to undue influence.

An Employee of ABT must obtain approval from the CEO (or in the case of directors or senior executives from the Chair) before accepting or offering any gift or hospitality where it is reasonably foreseeable that the gift or hospitality will exceed AU\$100 in value (Threshold Value).

## **2.4 Charitable and political donations**

ABT does not make payments in cash or in kind, directly or indirectly, to politicians, political parties, political organisations, their employees or any independent candidates engaged in politics. Any breach of this Policy could contravene applicable legislation and result in sanctions against ABT, its subsidiaries and their respective directors.

ABT may make charitable donations and contribute to social programs (e.g. community education and health programs) as permitted by local laws and practices. No charitable donation may be offered or made on behalf of ABT without the prior approval of the CEO.

## **3. Maintaining accurate books and records**

CEO must keep a record of all requests and written approvals for receiving and offering gifts or benefits. This register will be reviewed at least annually by the Board.

All accounts, invoices, memoranda and other documents and records relating to dealings with Third Parties should be prepared and maintained with strict accuracy and completeness. No accounts must be kept "off-book" to facilitate or conceal any improper payments.

## 4. Reporting

If any ABT employee becomes aware of any actual or suspected breach of this Policy, or of any request or demand for any improper business or other advantage, this must be promptly reported to the CEO. Reports may be made anonymously under ABT's Whistleblower Policy.

Employees are also encouraged to contact Company Secretary if they have any questions or concerns regarding this Policy or subject matter to which this Policy relates. Any enquiries will be treated with the utmost confidentiality.

## 5. Consequences for breach of this policy

A breach of any of the provisions of this Policy may lead to disciplinary action (including termination of employment or engagement). Conduct in violation of this Policy may breach applicable anti-corruption laws and result in criminal or civil penalties, including fines and imprisonment.

ABT employee must cooperate fully and openly with any investigation by ABT into alleged or suspected corrupt activity or breach of this Policy. Failure to cooperate or to provide truthful information is a breach of this Policy.

## 6. Training

ABT will provide training sessions to assist employees' understanding and management of bribery and corruption issues, as appropriate. ABT will ensure that, to the extent it is relevant to their role, ABT employees (including new employees) are informed about this Policy. Relevant ABT employee will receive or be provided with access to a copy of this Policy, and will be provided with training on bribery and corruption awareness. This training will occur on the induction of relevant new ABT employee and then on a regular basis.

## 7. Governance

ABT will review the policy at least every two years. The policy will be approved and endorsed by our Board of Directors and Executive Leadership team.