

Engentus Pty Ltd.

Anti-Corruption Policy

Revision Number	Revision Date	Description	Approved By
1	28/06/21	Rebranding	

Anti-Corruption Policy

Policy Brief and Purpose

Engentus Pty Ltd (the company) is committed to conducting its affairs in an ethical, legal and fair manner. It is in the best interests of the company and the wider business community that corrupt practices in business are neither condoned nor encouraged and the company will not allow such behaviour to be part of its way of doing business.

Scope

This policy applies to all employees, contractors and persons acting on behalf of the Company.

Policy Elements

The company will comply with all anti-corruption legislation and regulation regardless of the jurisdiction in which it does business. Corruption and bribery in any form are strictly prohibited in all of the company's activities.

The company and its representatives shall:


1. Conduct themselves with integrity and honesty in all dealings with suppliers, contractors, customers and other external entities;
2. Not offer unauthorised or illegal incentives to third parties in order to advance the interests of the company or to encourage them to act in an improper or illegal fashion;
3. Be transparent in all communication with all external entities;
4. Not offer not provide any payment or incentive, either directly or indirectly to any third party in exchange for services or preferential treatment outside authorised fees and charges;
5. At all times conduct the business of the company in keeping with all appropriate statutes, regulations and legislation in the jurisdictions in which it operates.

It is common practice for businesses to give small gifts to valued clients and business contacts. However, no item of any value must be provided to third parties without first being approved by company management. In any event, any such gift must be offered for

legitimate business purposes, not be proffered as a reward for a specific outcome or to influence a decision and must be legal under the laws of the jurisdiction in which the business is being conducted.

Any employee who becomes aware of a transaction or behaviour which could be construed as corrupt has a responsibility to immediately bring it to the attention of senior management. Employees who engage in such behaviour will be subject to sanction under the terms of the company's Performance and Misconduct policy.

Yours sincerely,



*David John Izzard
Managing Director
Engentus Pty Ltd*