



## QUICKSTEP HOLDINGS LTD

# ANTI-BRIBERY AND CORRUPTION POLICY

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Quickstep Holdings and the subsidiary companies (Quickstep) are committed to conducting business in accordance with all applicable laws and regulations and are committed to the highest ethical standards.

### **PURPOSE**

The purpose of this policy is to reinforce Quickstep's commitment to ensuring full compliance by the company, its subsidiaries and all stakeholders to anti-bribery and anti-corruption laws that are applicable when undertaking business.

The policy applies to Quickstep and all of its officers, directors, employees, agents, contractors, joint venture partners and any other party representing Quickstep, wherever they are in the world.

Quickstep is committed to acting fairly, honestly with integrity and in compliance with the law at all times. Quickstep will have zero tolerance regarding any corrupt conduct, including bribery or fraud in its business. It is expected that subsidiaries, affiliates, directors, officers, employees, agents, contractors and any other party representing Quickstep, wherever they are in the world, will act fairly, honestly, with integrity and in compliance with the law — that is, no persons associated with Quickstep will engage in any form of corrupt conduct.

All countries in which Quickstep conducts business have laws that prohibit corrupt conduct by companies and individuals. Breach of anti-bribery and corruption laws by Quickstep or its subsidiaries, affiliates, directors, officers, employees, agents, representatives or contractors worldwide could have serious consequences for each or any of the person's involved. The intention of this Policy is not to describe all of the specific requirements or provisions of the applicable laws.

Rather, the intent is to identify and impose standards so that those governed by the Policy understand the obligations and the underlying guiding principles to help ensure robust compliance with the Policy, and to provide tools and measures to detect and prevent violations of the Policy.

**WE WILL:**

- Comply with all applicable anti-bribery and corruption laws
- Act honestly and with integrity at all times in the conduct of Quickstep business
- Maintain measures to prevent and detect bribery and corruption by Quickstep or any other party representing Quickstep
- Be alert for instances of corrupt conduct and report any suspected or actual breach of this Policy
- Adhere to the Code of Conduct Policy
- Ask questions and seek advice if unsure about obligations under this Policy

**WE WILL NOT:**

- Offer or accept gifts or hospitality if doing so might impair objective judgement, improperly influence a decision or create a sense of obligation
- Use company property or funds (directly or indirectly) for any unlawful, unethical or improper purpose
- Authorise, provide, invite or accept any monetary or other benefit to obtain, retain or improve business or a business advantage
- Make a facilitation payment
- Offer or give anything of value including monetary payments to a government official or public officials (or their department, agencies or representative) to induce or reward improper conduct in the course of their duties or responsibilities
- Permit or turn a blind eye to someone else doing something (whether by acting or failing to act) that contravenes this Policy; nor
- Encourage someone else to do something (whether by acting or failing to act) that contravenes this Policy.

**BREACHES OF THIS POLICY**

- Will be investigated to determine if the breach has occurred, and if so;
- Disciplinary action will be taken and potential termination of employment or other termination of contract or other association with Quickstep, and
- Depending on the nature of the breach, legal action may also be taken.

Sponsor: <b>Jacque Courtney-Pitman</b>	Title: <b>Executive GM Human Resources</b>	Review Date: <b>August 2019</b>
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