

**QUICKSTEP HOLDINGS LTD**

# **ANTI-BRIBERY AND CORRUPTION POLICY**

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## **Contents**

|  |   |
|--|---|
| 1. PURPOSE.....                            | 2 |
| 2. WHO IS COVERED .....                    | 2 |
| 3. OUR POLICY .....                        | 2 |
| 4. GIFTS AND HOSPITALITY .....             | 3 |
| 5. SUSPECTED BREACHES OF THIS POLICY ..... | 3 |

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.

## **1. PURPOSE**

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

## **2. WHO IS COVERED?**

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

## **3. OUR POLICY**

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Quickstep is committed to acting fairly, honestly with integrity and in compliance with the law always. Quickstep will have zero tolerance regarding any corrupt conduct, including bribery or fraud in its business. It is expected that subsidiaries, directors, officers, employees, agents, contractors, joint venture parties 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 representing 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. Breaches of anti-bribery and corruption laws by Quickstep or its subsidiaries, directors, officers, employees, agents, contractors, joint venture parties and any other party representing Quickstep could have serious consequences for the company and each or any of the person's involved. The intention of this Policy is not to describe all the specific requirements or provisions of the applicable law. 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.

### **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 by doing so it 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 official (or their department, agencies or representative) to induce or reward improper conduct in the course of their duties or responsibilities
- Make contributions to political parties, organisations or individuals engaged in politics unless expressly approved by the Chairman of the Board and considered necessary in the course of doing business.
- 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.

#### 4. GIFTS AND HOSPITALITY

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Staff may not accept or provide gifts in relation to any non-governmental third party with a value in excess of \$150, or its equivalent in local currency, without the approval of their line manager and must ensure that it is solely for the purpose of cultivating or enhancing a business relationship. Gifts in excess of \$150, from any one source per calendar year require the line manager’s approval and gifts in excess of \$250, or equivalent local currency, from any one source per calendar year will, in addition, require the approval of the CEO.

Staff and other persons working on our behalf are required to record any gift or hospitality given or received (including, where relevant, related expenditure) promptly and accurately. Such records are subject to managerial review. All expense related claims relating to hospitality, gifts or expenses incurred to third parties must be submitted in accordance with the applicable expenses policy, and specifically record the reason for the expenditure.

No accounts may be kept ‘off book’ to facilitate or conceal improper payments, and personal funds must not be used to accomplish what is otherwise prohibited by this Policy.

#### 5. SUSPECTED BREACHES OF THIS POLICY

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- 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 including of contract or other association with Quickstep, and
- Depending on the nature of the breach, legal action may also be taken.

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| Sponsor<br><b>Mark Burgess</b><br><b>CEO &amp; Managing</b><br><b>Director</b> | Signature<br> | Board Approval Date<br><b>October 2021</b> |
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