



# **Anti-Bribery and Corruption Policy**

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## 1 Purpose

Southern Cross Electrical Engineering Limited ('SCEE' or 'Company') is committed to carrying out its business with the highest level of integrity and ethical standards.

The objective of this policy is to provide a consistent standard of behaviour throughout the company and ensure that all personnel understand their obligations in respect of anti-bribery and corruption practices.

This Anti-Bribery and Corruption Policy has been formally approved by the Board of Directors.

## 2 Scope

This Policy applies to all employees, directors, contractors, and consultants of SCEE and its wholly owned entities.

## 3 Definitions

Term	Explanation
Bribery	Means the offering, promising, giving or accepting or soliciting of an advantage as an inducement for an action which is illegal, unethical or a breach of trust
Corruption	Means but is not limited to dishonest activity in which a Director, executive, manager, employee or contractor of an entity acts contrary to the interests of the entity and abuses his/her position of trust in order to achieve some personal gain or advantage for him or herself or for another person or entity
Entity	Means any company in the Southern Cross Electrical Engineering Group
Facilitation Payment	Means an unofficial payment or other inducement to a foreign official. Usually such payment is made to expedite or secure the performance of a routine government action
Personnel	Means all employees, directors, contractors and consultants of SCEE and its wholly owned entities
Policy	Policy means this Anti-Bribery and Corruption Policy

### 4 Policy

SCEE strictly prohibits any form of bribery, corruption or any other conduct which does not comply with applicable state, federal and international laws.

At all times personnel must conduct themselves in a manner consistent with SCEE's policies, stakeholder expectations and in compliance with laws and regulations.

#### 4.1 Corrupt Payments

SCEE personnel must not offer, pay, solicit or accept bribes in any form.

SCEE personnel are prohibited from making facilitation payments.

Any request for bribes or facilitation payments must be reported to the Chief Executive Officer.

#### 4.2 Gifts

SCEE prohibits the giving and receiving of gifts in connection with SCEE's operations where these go beyond common courtesies associated with general commercial practice. This is to ensure that the offer or acceptance of a gift does not create an obligation or cannot be construed or used by others to allege favouritism, discrimination, collusion or similarly unacceptable practices by SCEE.

If a member of SCEE personnel is in any doubt as to whether a gift goes beyond general commercial practice they should discuss this with their immediate manager.

#### 4.3 Entertainment

Entertaining external business stakeholders is permitted where there is a justifiable business purpose for such expenses to be incurred on behalf of SCEE. Valid entertainment expenses may include meals and events such as theatre, sporting events and other cultural events. The business purpose may be related to fostering the business relationship or be ancillary to a business discussion that takes place during, immediately before or immediately after the event.

SCEE personnel must not make or accept invitations where the costs exceed the level of accepted common business courtesies, taking into account the location in which the entertaining takes place and what would be appropriate for the role and responsibilities within the organisation.

If there is any doubt as to whether an invitation exceeds the level of accepted business courtesies this should be discussed with their immediate manager.

#### 4.4 Dealing with Government Officials

The provision of gifts or entertainment to a government official may be a legitimate and justifiable business activity in some circumstances; however, the practice has the potential to

create the perception that SCEE has sought to improperly influence the government official to achieve an improper advantage or obtain preferential treatment.

The offer, promise or giving of any gift, entertainment or other personal favour or assistance to a government official which might, regardless of value, be perceived as likely to improperly obtain/retain a business advantage, must be referred to the Chief Executive Officer in advance for approval.

SCEE does not make donations to any political party, politician or candidate for public office in any country unless the donation has been approved in advance by the Board.

Attendance at party-political functions as a representative of SCEE is permitted where there is a legitimate business reason. Attendance at these functions must be approved by the Chief Executive Officer.

## 5 Compliance with Laws and Regulations

Non-compliance with anti-bribery and corruption laws have potentially serious consequences for SCEE and the personnel involved.

Applicable laws and regulations to which all SCEE personnel must comply include:

- the Competition and Consumer Act 2010;
- the Criminal Code Amendment (Bribery of Foreign Officials) Act 1999 (Cth);
- the Foreign Corrupt Practices Act 1977 (US);
- the Bribery Act 2010 (UK);
- any other anti-corruption laws of the Commonwealth of Australia or any State or Territory of Australia (including any applicable common law, law of equity, any written law, statute, regulation or other instrument made under statute or by any government agency), and
- any anti-corruption law of a country other than Australia which applies to SCEE, its business partners or third parties operating on SCEE's behalf

## 6 Reporting Violations

Personnel who have witnessed, or who are aware of, any suspected bribery, corruption or any other conduct which does not comply with applicable laws and regulations must report it immediately to their manager, the Chief Executive Officer or in accordance with the Company's Whistleblower Policy.

Any reports made will be treated in confidence and in accordance with the Company's Whistleblower Policy.

SCEE will not tolerate any form of harassment or retaliation against Personnel who make a report under this Policy.

## 7 Regular Review

This Policy will be reviewed regularly to ensure that it remains current and effective.

**8 Related Documents**

Document ID	Document Title
SCEE-MN-CG-POL-0007	Code of Conduct Policy
SCEE-MN-CG-POL-0003	Whistleblower Policy