



Anti-Bribery and Corruption Policy

Last Updated 24/07/2023

Warsash Scientific is committed to the highest ethical standards and has a zero-tolerance approach to all forms of bribery and corruption, whether in the public or private sector. In regard to our conduct both domestically and abroad, Warsash Scientific is bound by all Australian laws^{1,2,3,4,5} governing anti-bribery and corruption.

This Anti-bribery and corruption policy applies to all employees, consultants, contractors, agencies, agents and any other person or persons associated with us including suppliers/customers and their employees.

Compliance with this policy is moreover, a key concern to many of our clients who expect us to adhere to internationally accepted standards of behaviour. These clients also have their own regulatory and conduct obligations and for reasons of good governance abide by their own code of ethics in regard to their suppliers.

1. Definitions

1.1. Bribery

Bribery can consist of monetary benefits or non-monetary benefits, such as gifts, travel, entertainment, favours, charitable or political contributions, employment opportunities or anything else of value. Bribes can be made directly to a recipient or indirectly by directing or authorising a third party to provide the improper benefit.

1.2. Corruption

The misuse of entrusted power/breach of duty for personal gain.

2. Doing the right thing

2.1. Gifts and hospitality

Normal and appropriate gestures of hospitality and goodwill may be accepted as long as the giving/receiving of gifts meets the following requirements.

- It is not made with the intention of influencing the party to whom it is being given, to obtain or reward the retention of a business or a business advantage, or as an explicit or implicit exchange for favours or benefits.
- It is not made with the suggestion that a return favour is expected.
- It is in compliance with local law.
- It is appropriate for the circumstances (e.g. giving small gifts around Christmas or as a small thank you to a company for helping with a large project upon completion)
- It is given/received openly, not secretly.
- It is not above a certain excessive value (such as \$100).

2.1.1. Where it is inappropriate to decline the offer of a gift (i.e. when meeting with an individual of a certain religion/culture who may take offence), the gift may be accepted so long as it is declared to the compliance manager, who will consider all relevant circumstances.

2.1.2. The intention behind a gift being given/received should always be considered. If there is any uncertainty, the advice of the compliance manager should be sought.

2.2. Facilitation payments and kickbacks

Warsash Scientific does not accept and will not make any form of facilitation payments of any nature. We recognise that facilitation payments are a form of bribery that involves expediting or facilitating the performance of a public official for a routine governmental action. Warsash Scientific does not allow kickbacks to be made or accepted. We recognise that kickbacks are typically made in exchange for a business favour or advantage.

2.3. Charitable contributions

Warsash Scientific accepts and encourages the act of donating to charities and agrees to disclose all charitable contributions it makes. We will ensure that all charitable donations made are legal and ethical under local laws and practices. Employees must be careful to ensure that charitable contributions are not used to facilitate and conceal acts of bribery.

3. Employees Responsibilities

3.1. All employees, contractors, consultants, and agents are bound by this policy and are responsible for the prevention, detection, and reporting of bribery and any other forms of corruption.

3.2. You are required to avoid any activities that could lead to, or imply, a breach of this anti-bribery policy.

3.3. If you have a reason to believe or suspect that an instance of bribery or corruption has occurred or will occur in the future, you are encouraged to raise your concerns as early as possible.

3.4. If you are uncertain about whether a particular action or behaviour can be considered bribery or corruption, you should speak to the director.

3.5. Anyone who breaches this policy will face disciplinary action which may include dismissal. The Managing Director has the right to terminate a contractual relationship with an employee if they breach this anti-bribery policy.

4. Protection⁶

4.1. Warsash will support anyone who raises concerns in good faith under this policy, even if investigations find that they were mistaken.

4.2. The identity of any whistleblower and all relevant information will be kept strictly in confidence.

4.3. Warsash will ensure no one suffers any detrimental treatment as a result of refusing to accept or offer a bribe or other corrupt activities.

4.4. Detrimental treatment refers to dismissal, disciplinary action, treats, or unfavourable treatment in relation to the concern the individual raises.

4.5. Anyone who files a report with the intention of spreading falsehoods or to threaten or damage any employee's reputation will be subject to disciplinary action.

5. Actions to be taken in case of an event

5.1. Take actions quickly to prevent or mitigate potential penalties.

5.2. Seek legal advice and take steps to ensure that communications are privileged to the extent appropriate.

5.3. Investigate the scope of the problem. Investigations can facilitate cooperation with authorities which can also reduce penalties.

5.4. Address the core problem, which may include cultural change.

5.5. Deal with employees concerned and cease the activity, where possible.

5.6. Implement, strengthen, and integrate compliance policies and programs to reduce the risk of reoccurrence.

Ref:

1. Foreign Bribery offence under the Criminal Code Act 1995 (Cth)
2. Anti-Money Laundering and Counter Terrorism Financing Act 2006 (Cth)
3. Anti-Money Laundering and Counter Terrorism Financing Rules 2007 (Cth);
4. Financial Transaction Reports Act 1988 (Cth)
5. Financial Transaction Reports Regulations 1990 (Cth)
6. The Treasury Laws Amendment (Enhancing Whistleblower Protections) Act 2019 (Cth)