



## Anti-Bribery and Anti-Corruption Policy

### 1. Introduction

Articore Group Limited (“**Articore**” or the “**Company**”, and collectively with its subsidiaries, “**Articore Group**”) is committed to compliance with all applicable anti-bribery and anti-corruption laws and regulations, including the Criminal Code Act 1995, (Commonwealth of Australia) and the United States Foreign Corrupt Practices Act. Articore Group sets high ethical standards for the directors, executives, staff and contractors of Articore and all companies in the Articore Group (“**Articore Group Personnel**”) in accordance with its Code of Conduct and has adopted this Policy to specifically promote full compliance with applicable anti-bribery and anti-corruption laws and regulations.

### 2. Prohibition Against Bribery and Corruption

Articore Group strictly prohibits Articore Group Personnel from engaging in or tolerating any form of bribery or other corruption.

“**Bribery or corruption**” for this purpose means the offering or providing (or authorising the offer or provision) of anything of value directly or indirectly, in cash or non-cash, to or for the benefit of any third party to obtain or retain business or to secure any advantage for Articore Group.

The prohibition of bribery under this Policy also includes the request or acceptance of (or the agreement to accept) anything of value from a third party either:

- intending that, in consequence, a function or activity should be performed improperly (whether by the requestor/acceptor or another person);
- where the request, agreement or acceptance itself constitutes the recipient's improper performance of a function or activity; or
- as a reward for the improper performance of a function or activity (whether by the recipient or another person).

### 3. Gifts and Entertainment

Articore has separately provided Articore Group Personnel with guidelines on the giving or receiving of gifts or entertainment to external parties. If any Articore Group Personnel are in any doubt as to the appropriateness of any gift or entertainment, they should consult a member of the Articore legal team before it is given or accepted or otherwise as soon as possible.

### 4. Reporting and Consultation

Any Articore Group Personnel who believes that a violation of this Policy has been committed or is being planned, should report the matter immediately to a member of the Articore legal team or via the Articore Group whistleblower service.

If any Articore Group Personnel is unsure whether a particular act constitutes bribery, or has any other queries, they should likewise consult a member of the Articore legal team. Articore Group prohibits retaliation against anyone reporting such suspicions. Articore Group Personnel who wish to raise a concern or report another's wrongdoing, or who have refused pressure to either accept or offer a bribe, should not be worried about possible repercussions. Articore Group encourages openness and will support any Articore Group Personnel who raises genuine concerns in good faith under this Policy.

## **5. Reporting**

Articore Group Personnel are encouraged to report any suspected breach of this Policy to the Group Chief Legal Officer or Company Secretary.

All suspected breaches of this Policy will be thoroughly investigated. If a breach is found to have occurred, disciplinary action and potentially dismissal will result. If the breach is also a criminal matter, the police or appropriate authorities will be notified.

## **6. Administration and Review of Policy**

The Company Secretary will be responsible for the administration of this Policy.

This Policy may be amended by resolution of the Board. The Board will review this Policy at least annually and amend as appropriate.

This Policy is available at [www.articore.com](http://www.articore.com) and any key features are published in the Articore Group Corporate Governance Statement.