



Introduction

Tutt Bryant Group Limited and its subsidiaries (collectively “TBG” or the “Company”) is committed to conducting business activities ethically, fairly and with honesty and integrity. Fraud, Bribery and Corruption, including facilitation payments, are all serious unethical behaviours that are inconsistent with TBG Core Values therefore TBG has zero-tolerance approach to preventing those behaviours by any of its directors, officers, employees or any other party acting on its behalf.

Purpose

This policy along with supporting systems, resources and processes are in place to:

- Set out the conduct expected to minimise the risk of exposure to bribery, corruption, facilitation payments, and fraud occurring in connection with TBG operations and/or activities in Australia and overseas.
- Provide guidance on how to recognise and uphold the prohibition of bribery, corruption, facilitation payments and fraud in connection with TBG operations.

Principles

TBG is committed to the following principles that will be embedded in all aspects of TBG business, and in the TBG Integrated Management System (IMS);

- The policy principles apply across TBG to all directors, officers, employees and other individuals or entities that are effectively controlled by TBG (collectively, TBG “Personnel” or “Employee”).
- The policy principles apply across TBG and extend to all to employees, officers and directors of TBG’s representatives, vendors, contractors, shippers, agents, and any other entity that performs services for or on behalf of the Company (collectively, TBG “Associated Persons” or “Third Party” / “Third Parties”).
- TBG business operations and/or activities shall be undertaken with zero-appetite and zero-tolerance towards bribery, corruption, facilitation payments, fraud and other improper conduct referred to in the TBG Code of Conduct.
- Bribery, corruption, facilitation payments, fraud and other improper conduct referred to in the TBG Code of Conduct is expressly prohibited, and TBG encourage Whistle Blowing and Protections for those who report breaches.
- As a condition of employment, engagement and association, all TBG Personnel and Associated Persons must and actively commit to and demonstrate a zero-appetite culture for bribery, corruption, facilitation payments, Fraud and other improper conduct in all aspects of business activities.
- Due diligence is conducted on employees and on those who are doing business with, or on behalf of, the TBG.
- Training and awareness about our zero appetite for bribery, corruption, facilitation payments and fraud must be conducted across TBG.
- Business activities must be transparent, sufficiently documented and above suspicion.
- TBG fosters a culture that encourages immediate reporting of potential breaches of this policy, and treating ‘allegations’ in a sensitive, fair, timely and confidential manner.

Approach

To meet the requirements of this Policy, TBG will implement:

- [TBG-FAA-POL-002 Securities Trading](#) – prohibiting use of “inside information” to “deal” in securities.
- [TBG-CS-STD-007 Whistleblower Protections](#) – protections and standard requirements that apply to Whistleblowers.
- [TBG-CS-STD-005 Code of Conduct](#) to define and educate in bribery and corruption, including facilitation payments, fraud and other improper conduct that is expressly prohibited.
- [TBG-RMQC-STD-007 Incident, Hazard Reporting and Investigations](#) – to define the process for reporting of issues/conduct that may be in breach of this policy.

Any breach of applicable laws or of this policy will result in disciplinary action applied in accordance with TBG procedures ([TBG-CS-PRO-004 Discipline](#), which can lead to application of the [TBG-CS-PRO-005 Termination Procedures](#) and prosecution). Additionally, persons convicted of a criminal offence or dismissed for serious misconduct relating to bribery, corruption, facilitation payments, fraud or other improper conduct should not benefit from their activity therefore TBG will seek all remedies permitted by law.

This Policy will not be amended without approval from the TBG Board.

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