



PUBLIC ANTI-BRIBERY AND CORRUPTION STATEMENT

Purpose of the Statement

CMR Tech PTY LTD is committed to conducting its business activities ethically and with integrity in order to prevent bribery or corruption by any of its partners, employees or any other party acting on behalf of CMR Tech.

CMR Tech and personnel are required to observe and comply with the provisions outlined in this document which sets out objectivity, integrity, professional behaviour and professional due care as its fundamental principles.

Furthermore, CMR Tech is committed to complying with all laws that apply, including bribery and corruption laws. As an example, bribing or attempting to bribe a foreign public official results in a breach of the Commonwealth Criminal Code and is a punishable offence.

CMR Tech have implemented an anti-bribery and corruption policy which applies to CMR Tech, firm personnel or those acting on behalf of CMR Tech and aims to:

- Set out the responsibilities of CMR Tech to minimise the risk of bribery or corruption occurring and
- Provide guidance on how to recognise, deal with and report instances of bribery and corruption.

Certain payments, arrangements and relationships ('arrangements') are more susceptible to bribery and corruption. This includes:

- Inducements including gifts and hospitality
- Facilitation payments
- Charitable contributions
- Political contributions and
- Third party arrangements.

Our policy also applies if travelling outside of Australia, where firm personnel are subject to the laws of the country they are in.

Where a country has specific bribery and corruption laws, firm personnel must comply with the more stringent requirements in place.



Summary of CMR Tech Anti-Bribery and Corruption policy statements

CMR Tech, firm personnel and those acting on behalf of CMR Tech will:

General

- Conduct business in an honest and ethical manner
- Act professionally, fairly and with integrity in all business dealings and relationships
- Not give, offer, accept or request bribes.

Facilitation payments

- Not give or offer facilitation payments unless a facilitation payment is required to be made to protect against perceived or actual danger to personal safety.

Inducements including gifts and hospitality

- Comply with the CMR Tech Australia Independence Policy in relation to inducements including gifts and hospitality:
 - Not offer or accept inducements where there is an actual or perceived intent to improperly influence behaviour
 - Not offer or accept inducements that are not considered trivial and inconsequential.

Sponsorships

- Only permit sponsorships to individuals or organisations where there is a bona fide business purpose and where the Firm has assessed there are no bribery or corruption risks associated with the sponsorship.

Recruitment and Selection

- Will not permit recruitment and selection practices which are susceptible to bribery and corruption, in line with the firms Talent Acquisition Policy.

Charitable contributions

- Ensure that charitable donations are legal and ethical under local laws and practices. In Australia this means that an organisation must have deductible gift recipient status with the Australian Taxation Office. This status enables the organisation to receive income tax deductible gifts and deductible contributions.

Political contributions

- Not make a donation to any political party, politician or candidate for public office unless the donation has been approved by the Head of Risk & Ethics.

Dealing with third parties

- Offer, solicit or receive a bribe directly or indirectly through a third party
- Decline any efforts made by third parties to unfairly affect any decision making process in order to achieve an advantage or benefit.



Record keeping

- Maintain accurate records of payment to third parties in accordance with the Corporations Act
- Not make, alter, destroy or conceal an accounting document (including being reckless in their conduct which allowed such an act) in order to facilitate, conceal or disguise improper conduct
- Report any suspected or actual bribery and or corruption in accordance with the CMR Tech Whistleblowing Policy.

Reporting

- Report any suspected or actual bribery and/or corruption. Any actual or suspected bribery and/or corruption may also be reported to the National Anti-bribery and Corruption Commission (NACC).