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## Anti-bribery and corruption policy statement

Accurri Pty Limited (referred to as Accurri, we, us or our) is committed to practising the highest level of ethical behaviour and has zero tolerance for bribery and/or corruption in any form.

Accurri requires compliance with both the letter and spirit of all anti-bribery and corruption laws in all jurisdictions in which it operates. Where a conflict arises between Accurri's zero tolerance position and the applicable legislative requirements of a jurisdiction, Accurri will adopt the more onerous requirement.

### Responsibilities

No Accurri entity or employee shall engage in bribery or corrupt practices in any form and where any employee is found to have engaged in bribery or corrupt practices they will be subject to summary dismissal.

No entity, or employees of an entity, acting for or on behalf of Accurri shall engage in bribery or corrupt practices in any form and where an entity or any of its employees or agents is found to have engaged in bribery or corrupt practices it will be considered a material breach and any agreement will be immediately terminated.

Accurri expects that each of its suppliers will have and maintain their own anti-bribery and corruption policies and practices and will also be committed to complying with all relevant anti-bribery and corruption legislation.

### Gifts and hospitality

Accurri employees will not offer or accept gifts which might be regarded as illegal or improper, or for which there is any suggestion that a return favour is implied or expected.

### Facilitation payments

Accurri regards facilitation payments as a form of bribery and consequently it will not pay facilitation payments or allow such payments to be made on its behalf.

### Political contributions

Accurri does not make political contributions and it does not allow such payments to be made on its behalf.

### Not-for-profit contributions

Accurri supports and encourages contributions to not-for-profit and community based organisations and such contributions may be made through in-kind services, knowledge, time, person hours or direct financial contributions. We will only make not-for-profit contributions that are legal and ethical and the bona fides of the not-for-profit organisation has been confirmed.

### Breach

Where Accurri becomes aware of bribery or corrupt activity it will, in addition to taking its own actions of dismissal or termination, refer the matter to the appropriate authorities and co-operate fully in any subsequent investigation.

Where Accurri suspects bribery or corrupt activity, it may refer the matter to the appropriate authorities and it will co-operate fully in any subsequent investigation.

Anyone who believes or suspects that this policy may have been breached in any way should report their concerns, in confidence, to the Chief Commercial Officer (CCO) by emailing [kevin.ormrod@accurri.com](mailto:kevin.ormrod@accurri.com).

## Corporate social responsibility policy statement

This statement is about how Accurri Pty Limited (referred to as Accurri, we, us or our) takes account of its economic, social and environmental impact in the way it operates as a business. By demonstrating our commitment to Corporate Social Responsibility (CSR) we aim to align our business values, purpose and strategy with the needs of our employees, clients, suppliers and others with whom we interact.

Accurri has developed an excellent reputation for the way in which it conducts its business in accordance with the highest principles of business ethics. We are proud of this reputation and are committed to conducting our business activities with honesty, integrity and in full compliance with all relevant laws and regulations.

As an innovative business, Accurri is continually seeking better, safer, more efficient and sustainable methods of working and our CSR objectives may be summarised as; We aspire to make a positive contribution to all those people and communities with whom we interact.

### Employees

Our employees are a highly valued part of the business. We do not treat them as resources, we treat them as people who are the very fabric of Accurri and Accurri products. We don't have many employees, therefore it is important that those we do have are the best at what they do. We work hard to recruit and retain the best we can find and second best is never good enough.

We encourage all of our employees to seek out and undertake personal and professional development, we encourage each of them to learn new skills and enhance old ones. We encourage frequent two-way communication that is honest, open and forthright.

We provide home-based (home-office) work opportunities for all and we ensure that everyone is furnished with the best equipment (hardware, software and office furniture) available.

### Environment

Even though we are a small company with a small environmental footprint we recognise that Accurri still has an impact on the environment we share. Accordingly, we are committed to ensuring that we minimise, as much as possible, the negative impacts of our operations. We encourage our employees and suppliers to consider, among other things, the:

- impact of work-related travel
- disposal of packaging and other waste, and potentially harmful, materials (e.g. inks, toners, batteries etc.)
- saving of energy by ensuring lights and equipment are switched off when not in use
- sourcing and using products that use recycled materials

### Health and safety

As all of our employees work from home-based offices, many of the more common health and safety requirements associated with large work places are not applicable. We do however encourage our employees to make sure the work spaces are well lit (preferably with natural light), temperature controlled, that furniture and equipment is ergonomic, proper posture is adopted and that routine breaks are observed.

We are also very interested in the well-being of our employees and we monitor for signs of undue stress or other warnings signs. We work with our staff to manage stressful or challenging situations should (or when) they occur.

### Communities

We are a part of many communities and in each we hope and encourage all of our employees to be a force for good. We are providers and consumers. We belong to industry groups, professional associations and alumni bodies. Some of us are parents and grandparents, brothers, sisters, wives, husbands, partners and children and in each role, we are unique members of many communities. We encourage each other to make a positive impact in those communities, and it doesn't matter if it is achieved by providing excellent client support, helping a colleague, volunteering at the local school, supporting a charity or pursuing a hobby that brings others pleasure. As long as each of us makes a positive impact in our communities, we are fulfilling a piece of our corporate social obligation.

## Modern slavery policy statement

Accurri Pty Limited and its wholly owned subsidiaries (referred to as Accurri, we, us or our) is committed to acting ethically and with integrity in all our business relationships and we take a zero tolerance approach to modern slavery and human trafficking.

### Statement

Modern Slavery includes a range of practices including, but not limited to: trafficking in persons; slavery; forced or compulsory labour; child labour; forced marriage; servitude; debt bondage and slavery.

Accurri is committed to identifying and eliminating the risk of modern slavery in its operations and supply chain.

### Our company

Accurri is a small, privately owned software development company focused exclusively on the development and support of statutory financial reporting software. We do not use sub-contracted labour and we do not outsource any software development or client support services. All software development activities and client support services are fulfilled in-house by our employees.

We do not have extensive supply chains. Our suppliers are primarily providers of equipment, telecommunications, software and web hosting services. We ensure, to the extent that is practical, that our suppliers are committed to the abolition of slavery and human trafficking. We are fortunate that most of our suppliers are large multi-national companies and they each have their own publicly stated policies regarding slavery and human trafficking.

### Our policies and positions

The following Accurri policies are relevant to monitoring and reducing the risk of modern slavery occurring within our company or its supply chain:

- this modern slavery policy statement
- our position on corporate and social responsibilities
- our position on whistle blowing
- our position on ethical business practices

We raise awareness amongst all of our staff of the risks of modern slavery in our company and supply chains and we encourage all of our employees to report any concerns about modern slavery or human trafficking in any part of our company or in our supply chains.

### Steps for the prevention of modern slavery or human trafficking within our company and its supply chains

As part of our effort to reduce the risk of modern slavery occurring within our company and its supply chains, we have carried out:

- a risk assessment to determine the level of risk of modern slavery posed to our business; and
- a supplier risk assessment to identify if any parts of our business or our suppliers are at risk of modern slavery so that efforts can be focused on those areas.

As a result of the assessments we are of the view that the risk of modern slavery or human trafficking occurring within our company and its supply chains is very low. We will however re-assess this risk at regular intervals.