

## Introduction

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 Executive Officer (CEO) by emailing [michael.berrington@accurri.com](mailto:michael.berrington@accurri.com).