

CORP 130 – Anti-Bribery and Corruption Policy

Purpose and Scope

This policy ensures Coventry Group Ltd (CGL) fosters a culture of corporate compliance, ethical behaviour and good corporate governance.

This Anti-Bribery and Corruption policy is intended to ensure all CGL directors, employees, contractors, employees of contractors and other relevant persons are aware that giving bribes or other improper payments or benefits to public officials is a serious criminal offence, can damage the Company's reputation and standing within the Community, and is a breach CGL's Values of Respect, Fairness, Teamwork Professionalism and Integrity, and the CGL Code of Conduct.

This policy will be made available on the CGL intranet and will be displayed on site notice boards.

Authority

This policy was prepared by the Chief Financial Officer and has been approved by the CGL Board of Directors.

Policy

Coventry Group strictly prohibits the giving of bribes or other improper payments or benefits to public officials, and the payment of secret commissions to those acting in an agency or fiduciary capacity. This includes the giving of donations to political parties.

Serious criminal and civil penalties may be incurred and reputational damage may be done if Coventry Group is involved in an act of bribery or corruption.

Breaches of this policy should be reported to the CGL Reporting Officer following the guidelines and processes within the CORP 300 – Whistle-blower Policy.

The act of offering, giving or accepting gifts, entertainment or hospitality to/from a supplier or third party other than public officials may occur from time to time. In this occurrence, all CGL employees should follow the CORP 550 – Supplier Awards and Incentives Policy and ensure they follow the CGL Code of Conduct and act honestly, ethically and without vested interests. All incentives or rewards above AUD\$500 require prior written management approval.

CGL Reporting Officer

The Chief Financial Officer is responsible for investigating all reported concerns, and to ensure the Chairman, CEO and/or Board Audit & Risk Committee is advised of all material reported incidents.

The CGL Reporting Officer will notify the complainant and acknowledge receipt of a report within five business days. All reports will be promptly investigated and, if warranted appropriate corrective action will be taken.

CGL will make its employees aware of this policy and its related processes via the PeopleStreme training programs which are conducted on commencement with the Company and through annual acknowledgements of the Code of Conduct and Corporate Governance Policies.

Associated Documents

- CGL Code of Conduct
- CGL Values
- CORP 300 – Whistle-blower Policy
- CORP 550 – Supplier Awards and Incentives Policy



Policy History

Description
Original Policy
Minor Update

Next Review Due

Reference #
CORP 130
CORP 130

Date
June 2019
October 2020

June 2022

Authority
ELT
Board

