

## 1. Purpose

Royal Poly Products is committed to the highest standards of integrity, transparency, and ethical conduct. This policy outlines our **zero-tolerance approach** to bribery, corruption, and facilitation payments in line with the **Criminal Code Act 1995 (Cth)**, **Modern Slavery Act 2018 (Cth)**, and applicable international standards, including **ISO 37001: Anti-Bribery Management Systems**.

## 2. Scope

This policy applies to:

- All employees, directors, officers, and contractors of Royal Poly Products;
- Third parties, including suppliers, agents, distributors, consultants, and other partners acting on behalf of Royal Poly Products;
- All domestic and international business operations, transactions, and joint ventures.

## 3. Zero Tolerance Commitment

Royal Poly Products prohibits any form of bribery, corruption, or improper payments, including:

- Offering, promising, or giving anything of value to improperly influence decisions;
- Receiving or soliciting bribes, kickbacks, or facilitation payments;
- Using company funds for unlawful political donations or sponsorships;
- Concealing, misreporting, or falsifying financial records related to improper transactions.

## 4. Ethical Conduct and Third-Party Compliance

- All third parties must comply with this policy as a condition of doing business with Royal.
- Suppliers and contractors must sign an undertaking to adhere to **our Anti-Bribery, Modern Slavery, and Supplier Code of Business Conduct**.
- Royal reserves the right to **audit third parties** for ABC compliance and to **terminate contracts immediately upon breach**.

## 5. Modern Slavery and Ethical Sourcing

- Bribery and corruption can conceal modern slavery and labour exploitation. Royal requires all suppliers to maintain transparent and fair labour practices throughout their supply chains.
- Ethical sourcing standards must be upheld, particularly when operating on Aboriginal and Torres Strait Islander land or sourcing from vulnerable communities.

## 6. Gifts, Hospitality and Entertainment

- Modest, **occasional gifts or hospitality** may be permissible if they are reasonable, transparent, and not intended to improperly influence decisions.
- Gifts or hospitality exceeding **AUD \$150** must be declared and approved by management.
- Cash gifts or equivalents (e.g., gift cards) are prohibited.

### 7. Facilitation Payments

Facilitation payments (small, unofficial payments to expedite routine actions) are **strictly prohibited**, regardless of local customs.

### 8. Employee Responsibilities

Employees, officers, and representatives must:

- Understand and comply with this policy;
- Avoid any activity that could lead to a perception of bribery or corruption;
- Report any suspected breach immediately.

### 9. Reporting and Whistleblower Protection

- Suspected or actual breaches must be reported to:  
[✉ compliance@royalmechgroup.com](mailto:compliance@royalmechgroup.com)
- Reports will be investigated confidentially. No retaliation will be tolerated against whistleblowers who report in good faith.

### 10. Recordkeeping and Audits

- All expenses, gifts, and business dealings must be **accurately recorded and reported**.
- All contracts with suppliers or agents will include **anti-bribery clauses**.
- Royal Poly Products will conduct periodic audits to verify compliance.

### 11. Disciplinary Actions

- Violations of this policy may result in disciplinary action, including termination of employment or contracts.
- Serious breaches may be referred to law enforcement or regulators.

### 12. Training and Awareness

- Employees and third parties will be provided with training and awareness programs as required.
- Contractors and suppliers may be subject to ABC compliance workshops or induction.

### 13. Policy Review

- This policy will be reviewed annually or as required by changes in law or business activities.
- The latest version will be available on:  
[https://royalpolyproducts.com/who\\_we\\_are\\_qhse\\_Section.html#Anti](https://royalpolyproducts.com/who_we_are_qhse_Section.html#Anti)

### 14. Governing Law

This policy is governed by the laws of **Western Australia** and applies to all operations worldwide.

**15. References**

- Criminal Code Act 1995 (Cth)
- Modern Slavery Act 2018 (Cth)
- UN Convention Against Corruption
- ISO 37001: Anti-Bribery Management Systems
- Royal Mechanical Group QHSE, Harassment, Discrimination, IT, and Supplier Code of Conduct Policies

**Approved by**

Sahil Thathu (Director)

12<sup>th</sup> August 2024

Full Name & Designation

Signature

Date