

ANTI-BRIBERY AND CORRUPTION POLICY

“At DIG PTS, we are committed to operating honestly, ethically, with integrity and full respect for the rule of Law”.

The purpose of this policy is to establish controls to ensure compliance with all applicable anti-bribery and corruption regulations, and to ensure that DIG Personnel and Training Solutions business is conducted in a socially, ethically and legally responsible manner.

This policy forms part of our Risk Management Framework and is underpinned further by our principles of:

- Customer focussed
- Honest & Reliable
- Innovative & Agile
- Merit & Fairness

POLICY STATEMENT

Bribery is the offering, promising, giving, accepting, or soliciting of an advantage as an inducement for action which is illegal or a breach of trust. A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage.

DIG PTS does not tolerate any form of bribery or corruption within or outside of our organisation. It is our policy to conduct all our business in an honest and ethical manner, and we are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate and implementing and enforcing effective systems to counter bribery and/or corruption.

We will uphold all laws relevant to countering bribery and corruption.

Bribery and corruption are punishable by fines and or imprisonment under Australian Law. If we are found to have taken part in corruption, we could face an unlimited fine, be excluded from tendering for public contracts and face untold damage to our reputation.

“We therefore take our legal responsibilities very seriously”.

SCOPE

WHO IS COVERED BY THE POLICY?

In this policy, **third party** means any individual or organisation you come into contact with during the course of your work for DIG Personnel and Training Solutions, and includes actual and potential clients, suppliers, distributors, business contacts, agents, advisers, and government and public bodies, including their advisors, representatives and officials, politicians and political parties.

This policy applies to all individuals working at all levels and grades, including senior managers, company officers, all employees (whether permanent, fixed-term, temporary and casual), consultants, contractors, trainees, work experience or any other person associated with us.

THIS POLICY COVERS:

- Bribes (financial or other)
- Gifts and Hospitality (of any kind)
- Facilitation Payments
- Political Contributions (financial or other)

- Charitable Contributions (financial or other)

BRIBES

Employees are not permitted to give, offer, promise, accept or authorise a bribe, whether directly or indirectly.

GIFTS AND HOSPITALITY

Employees must declare all gifts and benefits valued at **\$100 or more**.

Employees must not offer or give any gift or hospitality:

- Which could be regarded as illegal or improper, or which violates the recipient's policies; or
- To any Public Employee or Government Officials or Representatives, or Politicians or Political Parties

ACCEPTABLE GIFT AND ENTERTAINMENT EXPENDITURE:

Gifts and genuine hospitality and entertainment expenditure that is reasonable and proportionate is allowable provided it complies with the following:

- Being genuine and made for the right reason – it should be clearly given as an act of appreciation or common courtesy associated with standard business practice.
- no obligation – it does not place the recipient under any obligation.
- no expectation – expectations are not created by the giver or an associate of the giver or have a higher importance attached to it by the giver than the recipient would place on such a transaction.
- made openly – if made secretly and undocumented then the purpose will be open to question.
- reasonable value – its size is small and in accordance with general business practice.
- appropriate – its nature is appropriate to the relationship.
- at “arm’s length” – all transactions / gifts should be at an “arm’s length” basis with no special favours and no special arrangements.
- legal – it complies with relevant laws.
- documented – the expense or gift, if valued at \$100 or more, is fully declared.

FACILITATION PAYMENTS AND ‘KICKBACKS’

Facilitation payments are a form of bribery made for the purpose of expediting or facilitating the performance of a public official for a routine governmental action, e.g. Processing papers, issuing permits and other actions of an official in order to expedite performance of duties of a non-discretionary nature (i.e. which they are already bound to perform). The payment or other inducement is not intended to influence the outcome of the official's action, only its timing.

“Our strict policy is that facilitation payments must not be paid”.

POLITICAL CONTRIBUTIONS

The DIG Personnel and Training Solutions Business may make donations to political parties from time to time and will disclose such contributions to the Australian Electoral Commission and state electoral authorities as required.

CHARITABLE CONTRIBUTIONS

The DIG Personnel and Training Solutions Business may make charitable donations from time to time and will disclose such contributions if required. The support however of identified charities is reserved for the DIG PTS business and will constitute the businesses commitment to initiatives and the community. Charitable support and donations are acceptable (and indeed are encouraged), whether of in- kind services, knowledge, time, or direct financial contributions. However, employees must be careful to ensure that charitable contributions are not used as a scheme to conceal bribery. We only make charitable donations that are legal and ethical under local laws and practices. No donation(s) on behalf

of the DIG Personnel and Training Solutions business must be offered or made without the prior approval of the Managing Director.

RESPONSIBILITIES

You must ensure that you read, understand, and comply with this policy.

The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for DIG PTS or under our control. All employees are required to avoid any activity that might lead to, or suggest, a breach of this policy. You must notify your Manager as soon as possible if you believe or suspect that a conflict with or breach of this policy has occurred or may occur in the future.

Any employee who breaches this policy may face disciplinary action, up to and including a termination of employment or engagement.

Please note that a bribe does not actually have to take place! Just the mention of or promising to give a bribe or agreeing to receive a bribe is an offence.

RECORD KEEPING

We must keep financial records and have appropriate internal controls in place which will evidence the business reason for making payments to third parties.

You must declare and keep a written record of all hospitality or gifts accepted or offered, which will be subject to managerial review.

You must ensure all expenses claims relating to hospitality, gifts or expenses incurred to third parties are submitted in accordance with our expenses policy and specifically record the reason for the expenditure.

All accounts, invoices, memoranda and other documents and records relating to dealings with third parties, such as clients, suppliers and business contacts, should be prepared and maintained with strict accuracy and completeness. No accounts must be kept "off-book" to facilitate or conceal improper payments.

HOW TO RAISE A CONCERN

Under the DIG Personnel and Training Solutions Code of Conduct, all employees have a responsibility to help detect, prevent, and report instances of or suspected bribery and corruption as well as any other suspicious activity or wrongdoing in connection with the DIG PTS business. DIG PTS is committed to ensuring that all employees have a safe, reliable, and confidential way of reporting any suspicious activity. You are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage with your DIG PTS Consultant or Manager. If you are unsure whether a particular act constitutes bribery or corruption, or if you have any other queries or concerns, these should be raised with your DIG PTS Consultant or the DIG PTS Manager.

WHAT TO DO IF YOU ARE A VICTIM OF BRIBERY OR CORRUPTION

It is important that you inform your DIG PTS Consultant or Manager as soon as possible if you are offered a bribe by a third party, are asked to make one, suspect that this may happen in the future, or believe that you are a victim of another form of unlawful activity. The DIG PTS business can support you with information that may assist with your concern or conduct a further investigation or report.

RESPONSIBILITY

The Managing Director has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

The CFO has primary responsibility for implementing this policy, and for monitoring its use and effectiveness and dealing with any queries on its interpretation.

Management at all levels are responsible for ensuring those reporting to them are made aware of and understand this policy and are given adequate and regular training on it.

MONITORING AND REVIEW

The CFO will monitor the effectiveness and review the implementation of this policy, regularly considering its suitability, adequacy, and effectiveness. Any improvements identified will be made as soon as possible and employees notified of any changes or updates. Internal control systems and procedures will be subject to regular audits to provide assurance that they are effective in countering bribery and corruption.

“All employees are responsible for the success of this policy and should ensure they use it to disclose any suspected danger or wrongdoing”.

This policy does not form part of any employee's contract of employment, and it may be amended at any time.

BUSINESS ETHICS

In keeping with DIG Personnel and Training Solutions commitment to act ethically, sustainably and with integrity in relation to all its business dealings, our business framework is underpinned by our following policies:

- Code of Conduct Policy
- Corporate Social Responsibility Policy
- Sustainability Policy
- Anti-Bribery and Corruption
- Diversity and Inclusion policy
- Modern Slavery Policy

Edwin Davey - Managing Director

Signed: 