

 <b>Anti-Bribery and Corruption Policy</b>	<b>ISSUED BY:</b>	People Department
	<b>APPROVED BY:</b>	Chief People Officer
	<b>POLICY TYPE:</b>	People and Culture
	<b>LAST UPDATED: REVIEW DATE:</b>	October 2019 October 2021

## 1 Purpose

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The purpose of this Policy is to establish controls to ensure compliance with all applicable anti-bribery and corruption regulations, and to ensure that the Company’s business is conducted in a socially responsible manner.

Oncore’s Anti-Bribery and Anti-Corruption Policy, (the “Policy”) sets out Oncore’s requirements in relation to interactions with Officials and Third Parties. This Policy does not prohibit interactions with Officials, rather it forbids corrupt interactions with those individuals.

## 2 Policy statement

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Bribery is the offering, or providing (or authorising the offer or provision) of any loan, gift, lavish trip or entertainment, donation, payment, or any other thing of value directly or indirectly, in cash or in kind, to or for the benefit of any Official or Third Party to obtain or retain business or to secure any improper advantage for Oncore Group Holdings Pty Ltd or its subsidiaries (Oncore).

It is our Policy to conduct all of our business in an honest and ethical manner. We take a zero tolerance approach to bribery and corruption. We are committed to acting professionally, fairly and with integrity in all our business dealings and relationships by implementing and enforcing effective systems to counter bribery.

We will uphold all laws relevant to countering bribery and corruption in Australia, including the Criminal Code Act 1995 (Commonwealth of Australia).

## 3 Scope

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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 Oncore, and includes actual and potential clients, business contacts, agents, and government and public bodies.

Oncore requires all Personnel to comply with this Policy as well as the Anti-Corruption Legislation and any applicable anti-corruption laws and regulations specific to the location in which they operate. This Policy applies to all Personnel and contractors engaged by Oncore Group Holdings Pty Ltd (Oncore) and its subsidiaries, collectively referred to as Personnel.

This Policy covers:

- Bribery and corruption;
  - Interactions with officials;
  - Gifts and hospitality; and
  - Political and charitable contributions.
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## **4 Responsibility for Policy Compliance, Training and Review**

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Oncore's Company Secretary (Chief Financial Officer) is the CFO, and is the party responsible for the overall administration of this Policy. The CFO will monitor the implementation of this Policy and will review on an ongoing basis the Policy's suitability and effectiveness. Internal control systems and procedures will be audited regularly to ensure that they are effective in minimising the risk of non-compliance with this Policy.

Training on this Policy forms part of the induction process for all new Personnel. All existing Personnel will receive regular, relevant training on how to implement and adhere to this Policy. In addition, all Personnel will be asked to formally accept conformance to this Policy on an annual basis. Our zero-tolerance approach to bribery and corruption must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and as appropriate thereafter.

All Personnel should be vigilant and immediately report any breaches or suspicious activity in accordance with section 11. below.

## **5 Bribery and Corruption**

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Oncore's corporate values require that in all aspects of business all Personnel act honestly, adhere to the highest ethical standards, and act in compliance with all relevant legal requirements. In this respect Personnel must not engage in Bribery or any other form of corruption.

The prohibition of Bribery under this Policy includes the provision or conveying of anything of value to any Third Party, Official or family members of Officials, whether directly or indirectly, to secure any improper advantage or to obtain or retain business. This means that Personnel must not:

- a) Offer, promise or give an Item of Value with the intention of influencing an Official or Third Party who is otherwise expected to act in good faith or in an impartial manner, to do or omit to do anything in the performance of their role or function, in order to provide Oncore with business or an improper advantage; or
- b) Authorize the provision of an Item of Value to any other person, if it is known, or reasonably should have been known, that any portion of that Item of Value will be passed onto an Official or Third Party to secure an improper advantage or obtain or retain business; or
- c) Engage, or procure, another party to provide an Item of Value to an Official or Third Party, (or to procure another person to make such provision), in order to secure an improper advantage or obtain or retain business.

The prohibition of Bribery under this Policy also includes the request or acceptance by any Personnel of (or the agreement to accept) anything of value from an Official or Third Party either:

- a) intending that, in consequence, a function or activity should be performed improperly (whether by the requestor/acceptor or another person); or
- b) where the request, agreement or acceptance itself constitutes the recipient's improper performance of a function or activity; or
- c) as a reward for the improper performance of a function or activity (whether by the recipient or another person).

## **6 Interactions with Officials and Third Parties must be Compliant**

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All interactions with Officials and Third Parties must comply with this Policy, Oncore and Personnel must not take any actions, whether direct or indirect, which create the appearance of impropriety; regardless of whether there is any improper intent behind their actions.

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## **7 Gifts and hospitality**

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Personnel 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.
- a) Cash and cash equivalent (eg gift vouchers) must never be offered or accepted as a gift.
  - b) Gifts and entertainment should only be offered for genuine business purposes.
  - c) Gifts and entertainment should be appropriate to the occasion/circumstances and in proportion relative to the importance of the customer or business relationship and must not be offered, given or received in circumstances that could be considered to give rise to undue influence.
  - d) Personnel must never request a gift or entertainment from a Third Party.
  - e) Gifts and entertainment must only be offered or accepted in compliance with any relevant government law, regulation, rule, or code.
  - f) If the value of a gift or entertainment exceeds \$250, Personnel must receive prior approval in writing (which can include email) and record it in the Gifts and Entertainment Register.

## **8 Political and Charitable contributions**

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Oncore prohibits Personnel from making political contributions to candidates for any political office on behalf of Oncore. This Policy does not seek to curtail an individual's freedom to make political contributions in their personal capacity. The context of any other political contributions is key in determining their appropriateness. For instance, it is permissible for Oncore to make a payment to attend a political function in circumstances where such payment could not be construed as an attempt to influence the political party. If you are in any doubt as to the appropriateness of any political contribution, you should consult Oncore CFO before it is given or accepted or otherwise as soon as possible.

Charitable support and donations are acceptable and encouraged by Oncore, whether of knowledge, time, or direct financial contributions. However, Personnel must be careful to ensure that charitable contributions are not used as a scheme to conceal bribery.

Oncore is committed to the communities in which it does business and encourages and supports Personnel participating in local community development initiatives, making donations and undertaking volunteer work. In addition, Oncore supports a number of nominated charitable organizations as determined by the local business. Apart from donations made pursuant to an approved matched funding program, Personnel should only make donations on behalf of Oncore with the prior approval of a member of the Executive team.

## **9 Documentation and Recordkeeping**

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As part of Oncore's commitment to open and honest business practice Oncore requires all of its businesses to maintain accurate books of account and records. Oncore and its subsidiaries must keep accurate and complete records of all business transactions:

- a) in accordance with the law and generally accepted accounting principles and practices,
  - b) in accordance with Oncore's accounting and finance policies, and
  - c) in a manner that reasonably reflects the underlying transactions and events. It is the responsibility of all Personnel to ensure that all business transactions are recorded honestly and accurately and that any errors or falsification of documents are promptly reported to the appropriate member of the Executive team and corrected.
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## **10 Your responsibilities**

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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 Oncore.

All Personnel 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.

Personnel who breach this Policy will face disciplinary action, which could result in dismissal for gross misconduct. We reserve our right to terminate our contractual relationship with other workers if they breach this Policy.

## **11 How to raise a concern**

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You are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. 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 the CFO or use the procedure set out in the Oncore Whistleblower Policy. A copy of this Policy can be found on Oncore's website or from the Compliance Officer.

## **12 What to do if you are a victim of bribery or corruption**

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It is important that you tell your 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.

## **13 Protection**

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Personnel who refuse to accept or offer a bribe, or those who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this Policy, even if they turn out to be mistaken.

We are committed to ensuring no Personnel suffers any detrimental treatment as a result of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion that an actual or potential bribery or other corruption offence has taken place or may take place in the future.

## **14 Monitoring and review**

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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. Internal control systems and procedures will be subject to regular audits to provide assurance that they are effective in countering bribery and corruption.

All Personnel are responsible for the success of this Policy and should ensure they use it to disclose any suspected danger or wrongdoing.

Personnel are invited to comment on this Policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to the Compliance Officer.

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