



Anti-Bribery and Anti-Money Laundering – Policy Statement

Bribery encompasses the act of offering, promising, giving, accepting, or soliciting an advantage as an inducement for actions that are illegal or breach trust. A bribe is an inducement or reward offered, promised, or provided to gain a commercial, contractual, regulatory, or personal advantage.

Money Laundering entails injecting funds generated from unlawful activities into the legitimate financial system to conceal or disguise the illegal source of those funds.

Our policy is to conduct all our business affairs in an honest and ethical manner. We adopt a zero-tolerance approach to bribery and corruption. We are committed to conducting our business professionally, fairly, and with integrity by implementing and enforcing effective systems to prevent bribery and money laundering.

Who Is Covered by this Policy?

In this policy, "third party" refers to any individual or organisation you interact with during your employment with us, including current and potential clients, business contacts, agents, government representatives, and public bodies. This policy applies to all employees and contractors working for Concept Commissioning, collectively referred to as "staff."

Bribes

Staff members must refrain from participating in any form of bribery, whether directly or indirectly.

Gifts and Hospitality

Staff should not offer or provide gifts or hospitality that may be deemed illegal or improper, or that violate the policies of the recipient. This prohibition extends to gifts or hospitality offered to public employees, government officials, or representatives. Staff may only accept gifts or hospitality from business associates if prior authorisation is obtained from one of the directors.

Charitable Contributions

Contributions to charitable causes, whether in the form of knowledge, time, or direct financial support, are permissible. However, staff must exercise caution to ensure that charitable contributions are not utilised as a means to conceal bribery.

Suspicious Payments

Prior to making or accepting payments, staff must verify the identities of customers. If a client or supplier requests a payment involving physical currency exceeding AUD10,000, staff should first notify their manager, who will then promptly notify AUSTRAC. Concept Commissioning will maintain records related to transactions and customer identification for seven years.



Your Responsibilities

It is your responsibility to read, comprehend, and adhere to this policy. The prevention, detection, and reporting of bribery and other forms of corruption fall under the purview of all Concept Commissioning employees. All staff are obligated to refrain from activities that may lead to or suggest a breach of this policy. If you suspect or believe that a conflict with or violation of this policy has occurred or is likely to occur in the future, you must promptly inform your manager.

Staff members found in violation of this policy will be subject to disciplinary measures, which may include dismissal for gross misconduct. We reserve the right to terminate the contractual relationships with individuals who breach this policy.

How to Report a Concern

You are encouraged to report concerns about any instance or suspicion of malpractice at the earliest possible stage. If you are uncertain about whether an action constitutes bribery or corruption or if you have any other questions or concerns, please raise them with your manager.

What to Do if You Encounter Bribery or Corruption

It is crucial that you promptly inform your manager if you are offered a bribe by a third party, are asked to make one, suspect that such an occurrence may take place in the future, or believe you are a victim of another form of unlawful activity.

Protection

Staff members who refuse to offer or accept a bribe or who raise concerns or report wrongdoing are at times concerned about potential repercussions. We aim to foster transparency and will support individuals who, in good faith, raise legitimate concerns under this policy, even if their concerns later prove to be unfounded. We are dedicated to ensuring that no one faces adverse treatment due to refusing to engage in bribery or corruption, or due to reporting, in good faith, their suspicion of an actual or potential bribery or other corrupt act or any future transgressions.

Ian Quaye | CPEng | MIEAust | NER | RPEQ | GSAP

A handwritten signature in blue ink, appearing to read "Ian Quaye".

Managing Director | Concept Commissioning

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