

Jarrahd	IMS-JIS-7-1-004.02	
	TITLE:	Antibribery, Corruption and Fraud Policy
	Department:	Human Resources

POLICY STATEMENT

Jarrahd Integrated Services (Jarrah) is a proud Aboriginal company delivering comprehensive Facilities Management Services, including a full suite of asset management, precise facility management (encompassing cleaning and soft services), complex project oversight, trades & maintenance functions, and outstanding catering and event services across Australia and New Zealand.

Jarrahd is committed to perform in accordance with all applicable legislations and regulations, and in accordance with the highest standards of ethical behavior. Jarrah prohibits any activity that seeks to bribe, corrupt, fraud or improperly influence any individual and entity within its business activities; and to act in any improper and non-compliant way of their role. Jarrah takes a zero-tolerance approach to any corruption, fraud and bribery.

This policy complies with:

- **Legislative Requirements:** The Criminal Code Act 1995 (Cth), applicable Australian state/territory laws, Crimes Act 1961 (NZ), and any other anti-bribery and anti-corruption laws applicable across jurisdictions.
- **ISO Standards:** ISO 45001:2018 (Work Health and Safety), ISO 14001:2015 (Environmental), and ISO 9001:2015 (Quality).

DEFINITIONS

Corruption, bribery and fraud are illegal and unethical. They destabilise communities, undermine the rule of law, and pose serious threats to sustained economic progress and the healthy operation of the business.

- **Corruption-** an act of dishonest and fraudulent behavior wherein someone uses their position of power to benefit themselves at the expense of others.
- **Bribery-** an act of offering, promising, giving, accepting or soliciting of an advantage as an inducement for an action which is illegal, unethical or a breach of trust.
- **Fraud-** Dishonest activity causing actual or potential financial loss to any person or entity - including theft of moneys or other property by employees, business partners or other persons external to the entity - and where deception is used either at the time, immediately before, or immediately following the activity. This also includes the deliberate falsification, concealment, destruction or use of falsified documentation used or intended for use for a normal business purpose or the improper use of information or position for personal financial benefit.
- **Business advantage-** an advantage gained that assists in the conduct of the business (ex. granting of a licence or permit in circumstances where it may not otherwise be granted).

POLICY PURPOSE

Jarrahd is committed to operating in a manner consistent with the laws and regulations of the jurisdictions in which it operates, including those relating to anti-bribery, fraud and corruption. Jarrah is also committed to the highest standards of integrity, fairness and ethical conduct.

POLICY APPLICATION

This policy applies to all employees, stakeholders, suppliers and Jarrah's subcontractors.

APPLICABLE LEGISLATION

Anti-Bribery and Anti-Corruptions Laws include:

- The Criminal Code Act 1995 (Cth)
- Any other anti-corruption and anti-bribery laws of Commonwealth of Australia and any other State or Territory of Australia
- Any anti-corruption and anti-bribery law of any other country other than Australia which applies to the individuals of third parties operating in Jarrah's behalf.

Breaches of these laws may expose Jarrah and its employees to criminal penalties and/ or civil actions. For Jarrah, possible consequences may include the imposition of substantial fines, exclusion from tendering for government and private contracts and reputational damage. For individuals, possible consequences include criminal and civil liability with associated significant fines, including imprisonment.

PROCEDURE AND REPORTING PROCESS

Jarrah is committed to conducting a business aligned with its values, conducting itself with integrity, honesty and fairness in all business practices.

It is not acceptable for the employees, or anyone that operates in Jarrah's behalf, to:

- Give, promise to give, offer any payment/gift with the expectations or hope that a business advantage will be received, or to reward a business advantage already given.
- Accept payments from a third party with an expectation that it will obtain any type of business advantage.
- Make any direct or indirect contribution to any political party, organization or individual engaged in politics as a way of obtaining an improper business advantage.
- Threaten or retaliate against another worker who has refused to commit a bribery offence or who has raised concerns under this policy
- Engage in any activity that might lead to a breach of this policy.

Jarrah recognises the value and importance of all employees reporting identified or suspected instances of bribery, corruption, fraud and other improper conduct and strongly supports such disclosures and reports.

It is the responsibility of all Jarrah stakeholders to remain alert to any instances of individuals within the business engaging in, or attempting to engage in, bribery or other improper conduct, or otherwise not meeting the standards of behaviour required under this Policy.

Any Jarrah stakeholder must report suspected or actual instances of bribery or other improper conduct to any of the following persons:

- Employee's direct manager
- HR Department
- Senior Leadership Team

Any stakeholder also can make an anonymous report via the Company's Whistleblower Policy. Detailed information must be provided to enable a formal investigation to be undertaken. In accordance with Jarrah's Whistleblower's Policy, the person reporting the breach of this Policy will be protected from victimization or harassment, discrimination, demotion, dismissal, or any future bias. If you are unsure as to whether particular conduct constitutes bribery or related improper conduct, contact HR directly.

RESPONSIBILITIES

Every person covered by this Policy is required to understand and comply with the Policy and with the reporting requirements set out in this document.

TRAINING AND AWARENESS

To support the effective implementation of this policy, Jarrah will provide regular annual trainings and awareness sessions for all employees, contractors and suppliers as directed by HR, to educate them about bribery, corruption, fraud, their signs and indicators and its responsibilities in preventing them. Training will be conducted regularly to ensure that all relevant stakeholders are equipped with the knowledge and tools to address the elements of this policy

effectively.

POLICY REVIEW

This policy will be reviewed annually to ensure its effectiveness and compliance with Australian and New Zealand legislative requirements and international standards. Updates may be made as necessary to reflect changes in laws, regulations, or best practices related to modern slavery and human trafficking.

POLICY BREACH

Non-compliance with this policy is treated as a serious offense. Consequences include:

- **For Employees:** Disciplinary actions, including termination of employment.
- **For Contractors and Suppliers:** Contract termination and exclusion from future business opportunities.
- **External Reporting:** Serious breaches may be referred to regulatory authorities.

Jarrahd will address systemic issues identified during investigations and implement corrective actions to prevent recurrence.

ENDORSED BY

Signed: **Matthew Block**

Position: CEO

Date: 31 October 2024