



ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

Date : 19 July 2024
Document No. : i24s-POL-026-1

CONTENTS

1	PURPOSE	2
2	SCOPE	2
3	DEFINITIONS	2
4	RESPONSIBILITIES	2
5	LEGISLATION AND STANDARDS	3
6	RESOLUTION OF ISSUES	3
7	GOVERNANCE	4

Document Control					
Version	Reason for Issue	Date	Prepared	Reviewed	Approved
A	Risk Management (Governance and Compliance)	15/2/2023	Anton Pickett, (Operations Manager, Civil & Construction)	Justin Kickett (Executive Director)	Angela Kickett (Executive Director)
1	Review	19/7/2024	Anton Pickett, (Operations Manager, Civil & Construction)	Justin Kickett (Executive Director)	Angela Kickett (Executive Director)

Any person(s) using i24s Group Pty Ltd's (i24s) documents or data accepts the risks of:

- a) using the documents or data in electronic form without requesting and checking them for accuracy against the original hard copy version; and
- b) using the documents or data for any purpose not agreed to in writing by i24s.

1 PURPOSE

i24s Group Pty Ltd (“i24s”) (“the Group”) (ABN 74 650 861 402), is a 100 per cent owned and operated Aboriginal business. The Group is a leading provider of talent pipeline/workforce solutions, industrial equipment hire and goods, and outreach and advocacy services, for the Mining, Resources, Energy, Infrastructure and Property sectors.

The Group is committed upholding the highest ethical business standards in all business activities.

The purpose of this **Anti-Bribery and Anti-Corruption Policy** (“Policy”) is to establish a culture where we conduct business in an honest and ethical way at all times. i24s chooses to do the right thing in everything we do and will fully support and protect our people and business partners who are acting and conducting themselves in accordance with the principles presented in our Code of Conduct.

2 SCOPE

This Policy applies to employees, sub-contractors and other parties undertaking work for the Group. When the following terms are referenced herein, “we”, “our” or “us”, we are referring to everyone at i24s.

The scope of this Policy applies to all workplaces which are under the Group’s control.

3 DEFINITIONS

Bribery is best described as an attempt to make someone do something for you by giving the person money, presents, facilitation payments, or something else that they want.

Examples of bribery include but are not limited to:

- paying a government official to get advanced warning of a development;
- employing a public official’s relative to influence the award of a contract; and/or
- paying the travel expenses of a client to gain engagement on a project.

Corruption is illegal, bad, or dishonest behaviour, especially by people in a position of power. It occurs when someone who has been granted official power exploits them for his or her benefit.

4 RESPONSIBILITIES

i24s holds our core values at the forefront of all activities we undertake. We value integrity and hold ourselves and others accountable for all actions.

We are committed to ethical behaviours regarding both the internal conduct of our business and our engagement with clients, partners, external stakeholders, and the public.

The Group:

- does not condone, enable or permit any form of bribery, corruption or unethical behaviours or practice;
- takes a zero tolerance approach to corruption of any kind, including bribery, kickbacks and facilitation payments; and
- competes fairly for our commissions based on quality price and innovative services, not by offering improper benefit to others.

Employees cannot:

- directly or indirectly offer, promise, grant or authorise the giving of money or anything else of value to client and government officials or third parties to influence official action or obtain improper advantage. This includes facilitation payments;
- authorise, undertake or participate in schemes to give any improper benefit, kick back or secret commission to anyone;
- promise or give cash or cash equivalent payment of any person or official for the purpose of obtaining advantage;
- use any third party to do something that is prohibited by the Group; and
- give anything of value to any third party when there is any suspicion that the third party will engage in bribery, corruption or other prohibited conduct.

We foster an open environment in which our people can report any suspected, fraudulent, or other improper practice without fear of reprisal. All reported incidents will be treated in confidence and investigated promptly independently with appropriate follow-up.

We will co-operate fully with external agencies investigating corrupt practices within any legal parameter.

5 LEGISLATION AND STANDARDS

The Group complies with all Australian requirements and legislations, as well as with internationally recognised standards for bribery and corruption including but not limited to:

- The Australian Criminal Code Act 1995 (Cth) – which criminalises corrupt conduct both domestically and internationally.
- The United Nations Convention Against Corruption (UNCAC) – the only binding international treaty dealing with corruption.

We acknowledge there are considerable penalties for corporations and individuals found to have engaged in bribery or corruption either domestically and/or internationally. These include financial penalties and imprisonment.

6 RESOLUTION OF ISSUES

Information on potential non-compliance with this Policy by the Group, its employees, clients, suppliers and any third parties with whom i24s conducts or anticipates conducting business with, must be reported promptly.

Employees can report issues of bribery or corruption by:

- contacting or speaking to their supervisor; and
- contacting or speaking to the Co-Founders and Officers/Executive Directors.

We also encourage our clients and stakeholders to report and express their concerns relating to our employee' behaviours and suspected violations of this Policy.

7 GOVERNANCE

The governance of this Policy is overseen by the Group's Officer, Angela Kickett. For further information about this Policy, please contact i24s on +61 8 9209 2090 or admin@i24s.com.au

Angela Kickett

Angela Kickett

Co-Founder/Executive Director

