

Anti-Bribery Policy

Our Commitment to Anti-Bribery & Corruption

1.0 Purpose

Inclusee Ltd (the **Company**) is committed to conducting its business in a fair and ethical way, without using unlawful practices to obtain unfair advantages in our business dealings. The Company acknowledges that bribes and corrupt practices are morally unacceptable, as they harm societies in which these acts are committed and prevent economic growth and development. They are also illegal in Australia and in most countries around the world.

This Policy will be communicated to all Company staff members and business associates working on our behalf. Any breach of this Policy will be regarded as a serious matter and may result in disciplinary action, dismissal or termination of contract.

2.0 Scope

This policy applies to the Company, its directors, officers and staff members as well as any contractors or other third parties engaged to provide services on behalf of the Company.

This Policy applies in all jurisdictions where the Company does business. It must be adhered to in all Company business dealings and transactions in all countries, with domestic or foreign government / public officials and transactions with private companies or persons.

All of Inclusee's directors, officers, staff members, contractors or other third parties engaged to provide services on behalf of Inclusee, are individually responsible for complying with this Policy and any breach may lead to disciplinary action, dismissal or termination of contract.

3.0 Prohibition of Bribery

The Company will not engage in bribery or corruption in any form, whether it involves individuals or companies in the public or private sector, in Australia or any other jurisdictions in which the Company operates.

It is strictly prohibited for directors, officers, staff members, contractors and third parties providing services on behalf of the Company to directly or indirectly accept, request, agree to receive, promise, offer or give a bribe.

All Company business activities must be conducted in full compliance with this Policy and all applicable anti-bribery and corruption laws including, but not limited to, the Commonwealth of Australia Criminal Code Act 1995 (Cth) and Crimes Legislation Amendment (Combatting Foreign Bribery) Act 2024 (Cth). To the extent that laws and regulations in any countries in which the Company operates with are more rigorous or restrictive than this Policy, those laws and regulations should be followed.

What is Bribery?

Bribery is the offering, promising, giving, requesting or accepting of a payment, inducement, reward or other benefit to another person in circumstances where:

- the benefit is not legitimately due to the other person; and
- the benefit is given with the intention of influencing the other person in order to obtain or retain business, or a business advantage, that is not legitimately due to the recipient.

Bribes can be given in many forms and do not necessarily involve payments of cash. A bribe could be, for example:

- **Kickbacks:** where a percentage from a contract is improperly returned to the person awarding that contract.
- **Facilitation payments or "grease" payments:** usually small, non-discretionary payments to government / public officials to speed up routine administrative processes.
- **Inflated commissions:** where higher than normal commissions are paid as a reward for improper behaviour.
- **Political or charitable donations:** for example, donating to a political party in exchange for their support for legislation that is favourable to the Company's business or donating to a charity, which is used to funnel money to local government officials.
- **Excessive or inappropriate entertainment:** which may influence the recipient.

It is an offence for companies or individuals to directly or indirectly bribe a public official. It is unlawful to offer a bribe, regardless of whether the offer is accepted, or the benefit gained. It is also an offence for a company or its directors or officers to fail to prevent bribery.

4.0 Gifts and Hospitality

It is important to note that Inclusee Ltd strictly prohibits all staff members, volunteers, contractors, board members, and any other representative of the organisation from accepting gifts in any form. All offers of gifts must be declared to the CEO.

There are some limited exceptions to this:

- Invitations to reasonable corporate events that support the development of positive relationships with stakeholders, are permissible.
- Promotional items with a small value (such as pens, T-shirts, cups, drink bottles etc.) are permissible.
- Basic food and/or beverages provided during a meeting for a business purpose (such as tea, coffee, sandwiches) are permissible.

Inclusee staff members, volunteers, contractors, board members and any other representative of the organisation, must never give, request, accept or offer:

- any form of gift.
- cash, loans, or cash equivalents.
- travel and / or accommodation costs for family members.
- invitations for family members to attend events where the staff member is not present.

5.0 Dealings with Public Officials

Public Officials includes all governments, government agencies, public officials, public agencies, candidates for public office and employees of state-owned commercial enterprises. In all dealings with Public Officials, all of Inclusee's directors, officers, staff members, contractors and any third parties providing services on behalf of the Company, must apply the highest ethical standards and comply with all applicable laws.

No one acting on behalf of the Company should exert, or attempt to exert, any improper or illegal influence on Public Officials. Improper or secret payments or improper transfers of any value made to Public Officials are strictly prohibited. This includes transfers made through intermediaries, or to a third party.

6.0 Documents and Record Keeping

The Company must maintain accurate books and records. Accurate and complete records of all business transactions must be kept:

- In accordance with generally accepted accounting principles and practices.
- In accordance with the Company's accounting and finance policies.
- In a manner that reasonably reflects the underlying transactions and events.

It is the responsibility of our directors, officers, staff members, contractors and any third parties providing services on behalf of the Company, to ensure that all business transactions are recorded honestly and accurately and that any errors or falsification of documents are promptly reported to the Company and corrected.

7.0 Reporting of Misconduct and Wrongdoing

Directors, officers, staff members, contractors and any third parties providing services on behalf of the Company that become aware of any breach of this Policy should immediately report it to their manager or the CEO. Reports may also be made under the Whistleblower Policy, on an anonymous basis if desired.

Policy compliance statement

Responsible Executive:	CEO	Date of Review:	September 2026
Approved by:	Inclusee Ltd Board	Date of Next Review:	September 2028