



COMPANY POLICY

ANTI-BRIBERY, CORRUPTION, FRAUD AND
ECONOMIC CRIME POLICY

2026 Board Approved Version

This policy replaces the previous Anti-Bribery & Corruption Policy and expands the control framework to include fraud prevention, conflicts of interest, procurement integrity, economic crime controls, record integrity and the use of digital monitoring and AI-supported compliance tools.

Policy owner	Board of Directors
Applies to	Directors, employees, workers, consultants, contractors, subcontractors, suppliers, agents, introducers and other associated persons
Approved by	Michael Simm and Russell Solts, Directors
Effective from	Apr 2026
Review frequency	Annually, or sooner following legal change, tender requirement, incident, investigation or material business change
Related records	Training records, declarations, gifts and hospitality register, conflicts register, supplier due diligence, investigation records and board approvals
Status	Final - issued for business use



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