

## VAXA ANTI BRIBERY AND CORRUPTION POLICY

Vaxa Group says 'no' to all forms of bribery/does not condone/ bribery in any form/ does not tolerate bribery or corruption/'s position on bribery is 'zero tolerance'/obeys the law/ does not condone bribery or corruption in any form.

## At Vaxa Group we:

- conduct all business in an honest and ethical manner;
- are committed to acting professionally, fairly and with integrity in all business dealings and relationships;
- do not permit the making of any inappropriate promises, gifts, or excessive hospitality to Foreign Public Officials in order to achieve unfair advantage or benefit; and
- resist any efforts made by others (including suppliers, customers or clients) to unfairly affect any official decision-making process in order to achieve unfair advantage or benefit.

## Vaxa Group's employees and Agents must:

- conduct all business in an honest and ethical manner.
- be committed to acting professionally, fairly and with integrity in all business dealings and
- relationships;
- not permit the making of any inappropriate promises, gifts, or excessive hospitality to Foreign Public
- Officials to achieve unfair advantage or benefit; and
- resist any efforts made by others (including existing or potential suppliers, customers, or clients) to
- unfairly affect any official decision-making process to achieve unfair advantage or benefit.

We encourage charitable donations only when they are ethical and legal under local laws and practices.

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We discourage facilitation payments as a means of doing business. We expect our business partners and Agents to implement and enforce effective systems to counter bribery.

We will always report and document any breach of the law that is brought to our attention through the reporting mechanism provided by Australian authorities.