



ANTI-BRIBERY AND CORRUPTION POLICY

MacTack Pty Ltd (MacTrack) is committed to conducting its business and activities with integrity and all MacTrack employees, contractors, consultants, suppliers and others representing or acting for, or on behalf of, MacTrack are required to comply with the following objectives:

- MacTrack will not engage in corrupt business practices;
- MacTrack will implement measures to prevent bribery and corruption by any director, employee, contractor or other party representing MacTrack;
- MacTrack will, at a minimum, comply with all applicable laws, regulations and standards (including ABC Laws) or, where internal policies require a higher standard, will apply and comply with such higher standard.

PROHIBITION ON CORRUPT PAYMENTS

MacTrack prohibits bribery and corruption, in any form, whether direct or indirect, whether in the private or public sector, anywhere in the world. Most countries have laws prohibiting bribery of private individuals and government officials. There are potentially serious consequences, including fines and imprisonment, for contravention of ABC Laws.

To this end:

- You must not offer, pay, solicit or accept bribes in any form.
- You must not engage in any form of corrupt business practice, whether for the benefit of MacTrack, yourself or another party.
- Facilitation payments are prohibited.
- Requests for bribes or facilitation payments must be reported to the General Counsel.

Gifts and entertainment, political contributions, charitable contributions and sponsored travel have the potential to be misused as a cover for bribes or improper payments for the purpose of influencing decisions or obtaining preferential treatment. For this reason, MacTrack has adopted special rules in relation to these types of payments to ensure openness and transparency.

Any breach of this policy is a serious matter which will be investigated and addressed by MacTrack. Disciplinary action will be taken against anyone who breaches this policy. Matters may also, depending on the circumstances, be referred to law enforcement agencies.

This policy applies to all MacTrack Directors, Officers, Executives, Managers, Employees and Contractors (where they are under a contractual obligation to do so).

Refer also to: *Australian Anti Bribery, Australian Corruption Rules and the Australian Criminal Code*