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Anti-Bribery and Corruption Policy



1. Scope

This document applies to all sites, employees and activities of HRL Holdings Limited and its subsidiaries (herein referred to as The Company). For the purposes of this policy, the term 'employees' includes contractors and representatives whose terms of engagement require compliance with the Code of Conduct.

2. Definitions

Bribery is the offer, payment, provision or receipt of an advantage to improperly secure the performance or non-performance of any function or duty in both the public and private sectors. The advantage may be financial or non-financial. The offer of the bribe may be direct or indirect.

Corruption is the abuse of a position of employment, authority or trust for gain.

3. Policy

The Company does not permit any form of bribery and corruption and applies a 'zero tolerance' to any form of bribery and corruption in the conduct of its activities. No employee will suffer adverse consequences for refusing to participate in an act of bribery or corruption, or for reporting, in good faith, suspected instances of bribery or corruption.

4. Reporting Bribery and Corruption

Employees must immediately report any actual or suspected instances of bribery or corruption to the CEO or using the Company Whistleblower process, so that appropriate action can be taken by the Company.

5. Compliance with Laws and Regulations

The Company is committed to ensuring compliance with all applicable national and international trade laws, regulations and restrictions when transferring materials, services and funds internationally.

Employees must ensure that they avoid reaching any agreement, or exchanging any competitively sensitive information, whether directly or indirectly, or any other action, which could imply unlawful coordination when dealing with competitors, customers, suppliers, joint venture partners and other third parties.

6. Conflicts of Interest

Employees must avoid conflicts between their personal interests and any business decision that they are involved in on behalf of the Company. Employees must not be involved in any conduct or activity that may compromise their ability to make impartial business decisions.

7. Gifts, Entertainment and Hospitality

The giving and receiving of gifts, entertainment or hospitality may create a risk of bribery and corruption and must never unduly influence business decision making or bring disrepute to those involved. Employees are required to abide by the disclosure and reporting guidelines detailed in the Company's Code of Conduct.



8. Dealings with Third Parties

The Company recognises that through their actions, subcontractors, suppliers, business partners and other third parties (parties) can directly impact the financial performance and profitability of the Company as well as its reputation. As such, the Company seeks relationships with external parties that share the Company's commitment to lawful business practice conducted to a high standard of ethical behaviour and conduct.

To ensure that these standards are met, employees are expected to carry out necessary checks to ensure that:

- The external party is reputable, competent and qualified to do the work
- The compensation that is being sought reflects a fair value for the services and goods provided
- The proposed arrangement complies with all applicable laws
- There is no conflict of interest that would make the engagement of the party inappropriate
- The party understands the Company's expectations, its Code of Conduct, and is contractually bound to meet standards consistent with the Code of Conduct.

9. Sponsorships and Donations

The Company has a framework to guide our business in supporting donations and sponsorships which are aligned with our business values, ensure mutual benefit and are legal, ethical and further the interests of the Company.

Review of Policy

The Policy is reviewed biennially by the Audit and Risk Committee to keep it up to date and consistent with legislative and other Corporate Governance Requirements.

This Policy was reviewed by the Board of Directors and adopted on 22/4/20.