



1.0 Purpose.

This document sets out the standards and expectations that underpin how BIC Consolidated (the 'Company') defines ethical conduct and ensures all employees are aware of their obligations in acting with integrity. The Company requires the highest level of ethical conduct and decision making in all instances and has zero tolerance for fraudulent or corrupt behaviour.

2.0 Scope.

This policy applies without exception to all personnel of the Company. It applies when an employee acts as a representative of the Company either in the course of the performance of the required duties of their role, taking action and making decisions for or on behalf of the Company.

3.0 Non-negotiable Principles.

- The Company has zero tolerance for bribery and corruption.
- Employees are prohibited from engaging in bribery, corrupt conduct or any conduct that is in breach of this Policy.
- All employees are required to avoid any activity that might lead to or suggest a breach of this Policy.
- Employees must comply with all applicable anti-bribery and corruption laws.
- The Company acknowledges that failure to comply with anti-bribery and corruption laws is a criminal offence.
- The penalties for breaching anti-bribery and corruption laws are significant both for individuals and the Company, including possible imprisonment, large fines and reputational brand damage.

4.0 Definitions.

The Company: refers to Consolidated Property Services (Australia) Pty Ltd and BIC Services Pty Ltd integrated as one business, as members of the Bidvest Group of companies.

Employee: a person who has accepted employment with the Company (whether permanent, fixed term or casual), contractors, consultants and directors wherever located.

Corruption: is an act or omission for an improper or unlawful purpose, which involves the abuse of a position of trust or power.

Bribery: is the offering, promising, giving, accepting, or soliciting of an advantage as an inducement for action which is illegal, unethical or a breach of trust.

Conflicts of interest: where an employee has a personal and/or professional interest that influences or could appear to influence the objective performance of their duties and responsibilities to the Company.

5.0 Corrupt conduct.

Employees are prohibited from engaging in any form of corrupt conduct. Corrupt conduct can take many forms including:

- Offering or taking bribes or secret commissions.
- Committing or knowingly facilitating blackmail, fraud, embezzlement, theft, tax evasion, money laundering.
- Altering, falsifying or fabricating any record for business or personal benefit.
- Dishonestly using a position of influence or trust.
- Deliberately failing to declare an actual conflict of interest.
- Withholding information about any of the activities above.



6.0 Bribery and inducement.

Employees are not permitted to give, offer, promise, accept, request, or authorise a bribe, whether directly or indirectly.

A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage and can take the form of gifts, loans, fees, rewards, kickbacks or other advantages.

7.0 Gifts and hospitality

Employees must declare all gifts and benefits, valued at \$250 or more, by entering details in gift register - within 5 working days of receiving or being offered the gift / benefit.

Employees are also expected to decline (or avoid accepting) gifts and benefits which are valued at \$500 or more, without express approval from the Company.

Employees should, where possible, discuss with their manager the fact that they have been offered a gift / benefit before accepting it, in order to determine the appropriate action.

Gifts and genuine hospitality and entertainment expenditure that is reasonable and proportionate is permitted provided it complies with the following:

- **Made for the right reason:**
It should be clearly given as an act of appreciation or common courtesy associated with standard business practice.
- **No obligation:**
It does not place the recipient under any obligation.
- **No expectation:**
Expectations for favourable treatment, benefit or personal gain are not created by the giver or an associate of the giver or have a higher importance attached to it by the giver than the recipient would place on such a transaction.
- **Made openly:**
If made secretly and undocumented then the purpose will be open to question.
- **Reasonable value:**
Its size is small and in accordance with general business practice.
- **Appropriate:**
Its nature is appropriate to the relationship.
- **At “arm’s length”:**
All transactions / gifts should be at an “arm’s length” basis with no special arrangements.
- **Legal:**
It complies with relevant laws.
- **Documented:**
The expense or gift, if valued at \$250 or more, is fully documented in accordance with this Policy.



8.0 Conflicts of Interest.

Employees are required not to participate in activities that involve a conflict between their duties and responsibilities, or which are prejudicial to the Company's business. Employees should not put themselves in a position of conflict with the best interests of the Company.

9.0 Whistleblower Protection.

Employees are required to report any instances of bribery or corruption that they observe in the course of their role in the Company.

Disclosures made by Company personnel making a bona fide report of an alleged violation in compliance with the Anti-Bribery and Corruption Policy are protected under the Company's Whistleblower Policy.

10.0 Training and Communication.

All employees are to undertake annual training in the requirements and guidelines of this policy. The Company is to ensure that training in Anti-bribery and Corruption is mandatory and included as a pre-requisite for all employment and annual performance reviews.

Any changes to the Anti-bribery and Corruption Policy are to be communicated with all employees in a timely manner, clearly highlighting key changes.

11.0 Related Policies, Procedures and Guidelines

- Procurement and Expense Management Policy
- Travel, Entertainment & Corporate Card Policy
- Gift and Benefits Policy
- Company's Disclosure Policy

12.0 Ownership and Version Control

Policy Owner	General Manager, People & Culture
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Revision	Description	Author
1.0	BIC/CPS original + Initial Draft	LD, CE
1.1	Executive Management Team Review	EMT