



ANTI BRIBERY and CORRUPTION POLICY

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PURPOSE

Pureprofile is committed to conducting business worldwide with integrity and transparency, and in full compliance with the anti-corruption laws of the countries in which we do business.

The purpose of this Policy is to:

- confirm that Pureprofile Limited, together with its subsidiaries, has zero-tolerance for bribery and corruption in any form and is committed to conducting all parts of its business in an honest and ethical manner;
- set out the responsibilities in observing and upholding Pureprofile's position on bribery and corruption; and
- provide information and guidance on how to recognise and deal with bribery and corruption issues.

WHO MUST COMPLY WITH THIS POLICY

This Policy applies to Pureprofile Ltd and all its subsidiaries and includes all directors, officers and employees (including temporary or contract staff) (Pureprofile Personnel). Pureprofile expects that those who perform services for or on behalf of Pureprofile will comply with the law and apply the same or materially similar standards detailed in this Policy. This includes agents, contractors, consultants and advisors. This Policy applies to any activity undertaken in connection with Pureprofile, regardless of the geographic location in which that activity occurs.

WHAT IS BRIBERY AND CORRUPTION

Under the law, bribes and bribery have a very wide definition.

Bribery is the offer, promise, payment or provision of a benefit or something of value to a public official, private company or individual, to improperly influence a person in order to obtain or retain business or an advantage that is not legitimately due. Bribes can take the form of cash, gifts, loans, fees, hospitality, services, rewards, discounts, or other advantages such as taxes, services, donations, or anything else of value.

Corruption as a form of dishonesty or criminal offense undertaken by a person or organization entrusted with a position of authority, to acquire illicit benefit or abuse power for one's private gain.

PROHIBITED CONDUCT

Pureprofile Personnel must not:

- give, promise to give, or offer a bribe, kickback, secret commission or other form of improper payment in order to obtain (or with the expectation or hope of obtaining) any improper business or other advantage for Pureprofile, for themselves or for others;
- make a payment to a Public Official with the purpose of expediting or facilitating the performance of a routine government action also known as a **Facilitation payment**;
- give or receive a Benefit involving a Public Official, other than, for example, where it involves modest entertainment such as coffee or a reasonable priced meal or a low cost and modest gift;
- give or receive a prohibited Benefit
- engage in any fraudulent conduct, including misappropriation of funds or other assets, causing a loss to Pureprofile or creating a liability for Pureprofile by deception, impropriety in the handling or reporting of money or financial records or false invoicing for goods or services never provided; or
- cause or authorise any of the above conduct or engage in any other activity that is inconsistent with this Policy.

Pureprofile recognises that Public Officials are often subject to additional restrictions. Particular care must therefore be taken in dealings with Public Officials. **Public Official** refers to any government or public official in Australia or any other country and also includes an employee, official or contractor of a government or public body, a government-owned or government-controlled enterprise (including a state owned enterprise), or a public international organisation.

GIFTS AND ENTERTAINMENT

Giving and receiving gifts, entertainment, meals, travel/accommodation (including reimbursement), training or other things of value (Benefits) are common and play an important role in helping Pureprofile to build relationships or raise brand awareness when doing business and are not in themselves unlawful. However, if Benefits are given or received with the intention of improperly influencing the action or decision of another person in a business or regulatory context, this can leave Pureprofile vulnerable and could amount to bribery. All benefits given or received over the value of \$100 AUD require direct manager approval.

Giving or receiving Benefits that are unlawful, extravagant or inappropriate can have serious legal, ethical and/or financial consequences.

Pureprofile appreciates that practice varies between countries and regions, and what may be normal and acceptable in one region may not be in another.

RECORD KEEPING

Pureprofile must keep books and financial records and have appropriate internal controls in place which accurately reflect the parties, payment arrangements and the purpose of all transactions.

Pureprofile Personnel must:

- keep a written record of all Benefits given or received, which will be subject to managerial review; and
- submit all expenses claims relating to Benefits or payments in accordance with Pureprofile's expenses procedures and record the reason for expenditure.

BREACHES OF THIS POLICY

The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all Pureprofile Personnel. All Pureprofile Personnel are expected to immediately report actual or suspected breaches of this Policy.

Pureprofile's Whistleblower Policy sets out how to make a report and how that report will be received and investigated. Further information regarding the protections afforded to whistleblowers is set out in the Whistleblower Policy.

Pureprofile will not permit retaliation of any kind against any Pureprofile Personnel where they have reasonable grounds to suspect a breach of this Policy.

Material breaches of this Policy will be reported to the Board.

WHAT HAPPENS IF THIS POLICY IS BREACHED?

Pureprofile Personnel who breach this Policy may face disciplinary action, which could result in dismissal for misconduct or gross misconduct. Conduct in breach of this Policy may also breach applicable anti-corruption laws and result in criminal or civil penalties, including fines and imprisonment.

MONITORING AND TESTING

The Chief Operating Officer will monitor the implementation of this Policy and will review its effectiveness, including that internal control systems and procedures are periodically audited to ensure they are effective in minimising the risk of non-compliance with this Policy.

AMENDMENT AND REVIEW

This Policy is subject to annual review and any material amendments must be approved by the Pureprofile Board.

Appendix A – Key terms

Term	Meaning
Pureprofile Personnel	All directors, officers and employees (including temporary or contract staff) of Pureprofile.
Benefits	Giving and receiving gifts, entertainment, meals, travel/accommodation (including reimbursement), training or other things of value.
Bribery	<p>Bribery is the offer, promise, payment or provision of a benefit or something of value to a public official, private company or individual, to improperly influence a person in order to obtain or retain business or an advantage that is not legitimately due.</p> <p>Bribes can take the form of cash, gifts, loans, fees, hospitality, services, rewards, discounts, or other advantages such as taxes, services, donations, etc, or anything else of value.</p>
Corruption	Is a form of dishonesty or criminal offense undertaken

	<p>by a person or organization entrusted with a position of authority, to acquire illicit benefit or abuse power for one's private gain.</p>
<p>Facilitation Payment</p>	<p>Make a payment to a public official with the purpose of expediting or facilitating the performance of a routine government action</p>
<p>Public Official</p>	<p>Refers to any government or public official in Australia or any other country and also includes an employee, official or contractor of a government or public body, a government-owned or government- controlled enterprise (including a state owned enterprise), or a public international organisation.</p>