

# Anti-Bribery and Corruption Policy

## Introduction

Macquarie Telecom Group Limited and its subsidiaries (the Company) is committed to high standards of conduct and ethical behaviour in its business activities. We are committed to promoting a culture of honesty and compliance that upholds our core values. It is important that all employees conduct themselves in an ethical manner, not compromising themselves or the Company's interests.

Corruption and bribery have the potential to negatively impact upon our business, reputation, brand, fellow employees, customers, and suppliers. They may also result in criminal proceedings.

An honest and ethical workplace culture is the key to preventing corruption at work. This policy summarises the Company's uncompromising approach to fostering and maintaining a healthy workplace culture for employees.

## What is Corruption?

Corruption is the misuse of a person's position or power for private gain.

Examples of corruption include, but are not limited to:

- Accepting a secret commission in exchange for providing a customer with a free product, which the company would normally provide at a charge.
- Releasing the company's confidential information to a competitor in exchange for a paid holiday.
- Joining together with other tenderers to influence the outcome of a tender process.

## What is Bribery?

Bribery means offering, promising, or giving money or other thing of value to a person, directly or indirectly, to secure or retain business or any improper advantage.

Examples of bribery include:

- Making a cash payment to an employee of a potential customer to secure their influence in Macquarie's favour in a tender process.
- Authorising a facilitation payment to a government official to expedite granting of a permit, a contract, or to obtain preferential treatment for the company.
- Offering a gratuity to an employee, agent or representative of a supplier to secure any business from that supplier, or to influence that person to alter the terms of any contract with the supplier.

## What are the Company's responsibilities in relation to corruption and bribery?

As an ASX listed entity, Macquarie Telecom complies with the ASX Corporate Governance Principles and Recommendations. These principles require a listed company to have formal policies and processes to guide the behaviour of company directors, management and

employees, and to demonstrate the commitment of the company to ethical practices, which take into account not only legal obligations but also the interests of all stakeholders.

To facilitate compliance with the above requirements, Macquarie Telecom trains its employees in all applicable laws against bribery and corruption. In cases where Macquarie Telecom does business with international customers and/or suppliers, this training may extend to include foreign bribery and corruption laws.

The Company also has a Code of Conduct and Whistleblower Policy that compliments this Anti-Bribery and Corruption Policy.

### **Consequences of corrupt activities and bribery**

No employee may pay or accept a bribe or engage in any other corrupt activity. The Company has a zero tolerance policy towards all forms of corruption and bribery. Anyone who commits a corrupt act, including paying or accepting a bribe, will face disciplinary action, which may include:

- Termination of employment;
- Legal action; and
- Criminal charges.

### **Reporting suspected acts of corruption**

The examples set out in this document are not comprehensive and corruption or bribery may take many forms. Any suspected corrupt act or bribery should be reported to a member of the Executive Team or reported under the Whistleblower Policy.

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