



ANTI-CORRUPTION AND BRIBERY POLICY AND PROCEDURES

Purpose

The purpose of this Anti-Corruption and Bribery Policy is to set out the standards of conduct expected of all employees and stakeholders at Trendie, ensuring compliance with Australian laws and regulations related to corruption and bribery. The policy aims to prevent, detect, and address any form of corruption or bribery in our operations, promoting a culture of integrity and transparency.

Scope

This policy applies to all Trendie employees, including full-time, part-time, temporary, and contract staff, as well as third parties acting on behalf of Trendie, such as consultants, agents, and suppliers. It covers all business dealings and transactions in Australia and internationally, including interactions with public officials, private sector employees, and other third parties.

Relevant Legislation and Regulations

Trendie is committed to complying with all relevant Australian legislation and regulations, including but not limited to:

- **Criminal Code Act 1995 (Cth):**

Prohibits bribery of foreign public officials and outlines offences relating to bribery and corruption.

- **Australian Securities and Investments Commission (ASIC) Act 2001 (Cth):**

Establishes standards of corporate conduct and transparency.

- **State and Territory Anti-Corruption Legislation:**

Various laws at the state and territory levels addressing corruption in public and private sectors.



Policy Principles

- **Zero Tolerance for Corruption and Bribery:**

Trendie has a zero-tolerance policy towards any form of corruption or bribery. Employees and third parties must not, directly or indirectly, offer, give, receive, or solicit anything of value to improperly influence the actions of another party.

- **Gifts and Hospitality:**

Employees must not accept or offer gifts, entertainment, or hospitality that could influence or appear to influence the recipient's decision-making or lead to an actual or perceived conflict of interest. Any gifts or hospitality exceeding a nominal value must be reported and recorded in the Gift Register.

- **Facilitation Payments:**

Facilitation payments, even if considered a common business practice in some countries, are strictly prohibited. Such payments are seen as bribes and are illegal under Australian law.

- **Interactions with Public Officials:**

Special care must be taken when dealing with public officials. Employees must not offer or provide any financial or other advantage to a public official to influence an official act or decision.

- **Third-Party Relationships:**

Trendie requires that all third parties acting on its behalf adhere to this policy. Employees must conduct appropriate due diligence before engaging third parties to ensure they do not engage in corrupt practices.

- **Charitable Donations and Sponsorships:**

Charitable donations and sponsorships must not be used as a subterfuge for bribery. All such activities must be transparent, made in accordance with company guidelines, and recorded accurately.



Responsibilities

- **Employees:**

All employees are responsible for reading, understanding, and complying with this policy. They must avoid any activity that might lead to, or suggest, a breach of this policy. Employees are required to report any suspected corruption or bribery to their manager or the Compliance Officer.

- **Managers:**

Managers are responsible for promoting a culture of compliance and ensuring that their teams understand and adhere to this policy. They must ensure that their staff receive appropriate training on anti-corruption and bribery practices.

- **Compliance Officer:**

The Compliance Officer is responsible for implementing this policy, conducting regular risk assessments, and providing guidance to employees. The Compliance Officer is also responsible for investigating reports of suspected breaches and ensuring that appropriate actions are taken.

Procedures for Reporting and Investigating Breaches

- **Reporting:**

Employees must report any suspected or actual corruption or bribery incidents to their manager or the Compliance Officer immediately. Reports can be made anonymously if preferred, and Trendie will ensure that there is no retaliation against employees who report in good faith.

- **Investigation:**

The Compliance Officer will conduct a thorough investigation into any reported incidents of corruption or bribery. The investigation process will involve gathering and analysing relevant evidence, interviewing witnesses, and ensuring confidentiality.

- **Disciplinary Action:**

If an employee is found to have engaged in corrupt or bribery activities, they will face disciplinary action, which may include termination of employment and legal action. Third parties found in breach of this policy may have their contracts terminated and may be reported to the relevant authorities.

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- **Record Keeping and Monitoring:**

Trendie will maintain accurate records of all transactions, including gifts, hospitality, and donations, to demonstrate compliance with this policy. The Compliance Officer will conduct regular audits and reviews to monitor adherence to anti-corruption and bribery practices.

Training and Communication

Trendie will provide regular training on anti-corruption and bribery for all employees, ensuring they are aware of their obligations under this policy and the relevant laws. This policy will be communicated to all employees and made accessible through the company intranet and employee handbook. Third parties will also be made aware of the requirements of this policy during the onboarding process.

Review and Updates

This Anti-Corruption and Bribery Policy will be reviewed annually or as required to ensure its effectiveness and relevance in line with legal and regulatory changes. Any updates will be communicated to all employees and stakeholders promptly. It is the responsibility of all employees to familiarise themselves with the most current version of the policy.

Implementation and Compliance

Compliance with this policy is mandatory. Employees who fail to adhere to this policy may face disciplinary action, including dismissal and legal proceedings. Trendie is committed to fostering an ethical business environment and expects all employees and third parties to act with integrity and in accordance with this policy.