

ANTI-BRIBERY POLICY

Updated August 2022

SUMMARY

PlastX is founded on principles of social responsibility, trust, and integrity. We are deeply committed to the highest ethical standards, and the scrupulous conduct of our business. As a result, PlastX expressly prohibits all forms of bribery and corruption.

This Policy prohibits bribery (defined as the offer, payment or provision of a benefit to any person or entity in order to induce or reward the improper performance of an activity connected with the business) of government officials or private sector individuals or entities wheresoever we operate.

A violation of this Policy, or of PlastX's *Code of Business Ethics* could result in disciplinary actions including, but not limited to, termination of employment, or, in the case of our in-country partners, dissolution of the commercial relationship.

It is therefore vital that employees and in-country partners not only understand and appreciate the importance of this Policy, but also comply with it in their daily work. If you have any questions about this Policy or applicable Anti-Bribery laws generally, please contact PlastX Chief Operations Officer, [Gillian Hyde](#).

Purpose & Goals

This Policy is intended to outline the Business' risks related to bribery and corruption, to highlight your responsibilities under both the relevant anti-corruption laws and Company policies, and to provide you with the tools and support necessary to identify and combat those anti-corruption risks.

Risks and/or consequences of non-compliance

Any violation of relevant anti-corruption laws can lead to civil and criminal penalties and reputational damage to PlastX. Employees or in-country partners who violate these laws may face severe civil and criminal penalties, including incarceration. The prohibition against bribery is incorporated into our *Code of Business Conduct*. Thus, a violation of this Policy may also result in disciplinary actions including, but not limited to, termination of employment or dissolution of the commercial relationship.

Scope and Range of application

PlastX expects all directors, employees, in-country partners and third parties working on its behalf to refrain from engaging in any form of bribery or corruption, irrespective of citizenship, domicile, or location.

POLICY DETAILS

Applicable Laws –

PlastX employees and in-country partners must abide by all applicable Australian Anti-Bribery laws, and the local laws in every country in which we operate (including federal, regional, provincial, and state laws). These laws generally prohibit both bribery of government officials and private sector (commercial) bribery. Additionally, under Australian law, it is an offence to alter, destroy or conceal any accounting document with the intention to conceal or disguise such activity.

Prohibition of Bribery -

Government Bribery - PlastX and its employees and partners are prohibited from giving, promising, offering, or authorising payment of anything of value to any government official to obtain or retain business, to secure some other improper advantage, or to improperly influence a government official's actions. Additionally, PlastX associates must also avoid the appearance of improper interactions with government officials.

Commercial Bribery - In addition to the prohibitions on bribing government officials, PlastX prohibits employees and in-country partners from offering or providing corrupt payments and other advantages to - or accepting the same - from private (non-government) persons and entities. These "kickbacks" constitute commercial bribery, and are prohibited.

Facilitation Payments – Facilitation payments refer to small payments to government officials to expedite or facilitate non-discretionary actions or services, such as obtaining an ordinary license or business permit, processing government papers such as visas, customs clearance, or providing telephone, power or water services. While Facilitation Payments remain defensible in some circumstances under Australian law, generally such payments are prohibited by this Policy, except for a very limited set of circumstances - for which prior written approval must be obtained*.

Providing Items of Value to Government Officials –

Government Dealings Approval - Before providing an item of value to any government official or entity, employees/partners must first obtain prior written approval*. Items of value provided to government officials must also be accounted for.

Gifts, Meals, Travel and Entertainment ('GME') - It is never permissible to provide gifts, meals, travel, or entertainment to anyone (government officials or commercial partners) in exchange for any improper favour or benefit. Additionally, gifts of cash or cash equivalents, such as gift cards, are never permissible. Prior approval* is required before providing any GME to a government official or entity.

Donations - It is never permissible to provide a donation to improperly influence a government official, or in exchange for any improper favour or benefit. It may, however, be permissible to make donations directly to a government agency (rather than to an individual government official) as part of a charitable activity. Prior approval* is required before making such a donation.

Promoting, Demonstrating, or Explaining Products - It is never permissible to direct promotional expenses or activities to a government official to improperly influence them, or in exchange for any improper favour or benefit. In some cases, however, it may be appropriate to direct such expenses to a government official or entity in order to promote, demonstrate, or explain the Company's products and services. Before doing so, Company associates must seek prior approval*.

Hiring or Engaging Government Officials - It is never permissible to hire or engage a government official, or their immediate family members, to improperly influence the official - or in exchange for any improper favour or benefit. Note that before hiring a government official (or relative thereof) Company associates must first receive approval*.

Third-Party Management -

Applicability to Third Parties – In-country partners, consultants, or any other third-party representatives acting for or on behalf of PlastX are prohibited from making corrupt payments on the Company's behalf. This prohibition also applies to subcontractors hired by third parties to perform work on the Company's behalf. Any and all payments made to third parties, including commissions, compensation, reimbursements, must be customary and reasonable in relation to the services provided and accurately documented in the Company's books and records. These payments must

not be made in cash without prior written approval*; or to bank accounts that are not in the third party's name, unless otherwise approved in advance and in writing*.

Training - PlastX Managers and in-country partner managers are required to undergo in-person or online Anti-Bribery training prior to commencing operations. For information on applicable training, contact PlastX Chief Operations Officer, [Gillian Hyde](#).

Auditing - PlastX will conduct periodic internal audits of relevant Company operations to help ensure the Company's continued compliance with applicable Anti-Bribery laws and this Policy. It is the duty of all employees to cooperate with—and never interfere with or obstruct—such audit activities or Company investigations.

Reporting Violations - If you observe conduct that may violate this Policy, contact PlastX Chief Operations Officer, [Gillian Hyde](#). Suspected violations will be reviewed and investigated as appropriate and may lead to disciplinary action. Any such reporting will be treated as confidential to the extent permitted by law. The Company strictly prohibits retaliation for good faith reports of suspected misconduct. Failure to report a violation of this Policy constitutes an independent violation of this Policy and is subject to discipline, up to and including termination of employment.

- For further information, or to request approval for any payments, gifts, travel, meals or entertainment, please contact PlastX Chief Operations Officer, [Gillian Hyde](#).