

## Policy: CP1027 Anti-Bribery and Corruption

Cirrus has zero tolerance to bribery and corruption, breaches of regulations or laws and is firmly committed to acting with integrity, due skill, care, diligence, and fairness in all our business dealings and commercial relationships. Bribery is a serious criminal offence and is not tolerated.

Here at Cirrus Networks, we conduct our business fairly and lawfully and will not tolerate:

- The giving or receiving of improper monetary or other inducements in commercial relations, and;
- Any other inappropriate practice which might be perceived to influence improperly a person's conduct in their professional or public duty.

In adopting this approach, we aim to protect the interests of our customers, shareholders and employees to minimise the associated risk to the reputation of our business. In doing so, as a Cirrus employee you are required to work within all relevant laws and regulations in all jurisdictions in which we operate nationally.

Here at Cirrus Networks we are committed to ensuring all staff act responsibly and ethically, both when pursuing business opportunities and when awarding business.

Our company's exposure to bribery and corruption is limited by:

- Senior management endorsing that Cirrus Networks operates a policy of zero tolerance to bribery and corruption
- A Speak Up Policy and processes to encourage and ensure that individuals can confidentially report any suspicions of bribery or corruption
- Ensuring that appropriate procedures are in place to process sensitive information, investigate accordingly and implement any control enhancements necessary
- Anti-Bribery and Corruption is considered in the processes where there could be a risk of offering an improper advantage or being perceived to do so, including, but not limited to corporate donations, charitable sponsorships, political donations, commercial sponsorships and employee opportunities. In addition, individual incentive awards from 3rd parties whilst executing company business
- Prohibiting the provision of facilitation payments. Facilitation payments are unofficial sums made to expedite or facilitate a "routine official action". It induces or rewards a person, to give preferential treatment, to perform a task improperly or to refrain from performing a task properly, and;
- Supporting the regulatory and law enforcement agencies, nationally, in any prosecutions and ensuring that allegations of bribery or corruption are thoroughly investigated.

At all times employees must protect all stakeholder interests. By outlining our controls and processes, we aim to promote transparency with our stakeholders, including our customers, vendors and other third parties with whom we conduct business.

In the interest of all stakeholders and to ensure we operate in an open and transparent manner; the Appreciation Register has been put in place. All gifts, trips, monies, pre-paid or credit cards, outings, vouchers or gestures/donations over the value of \$500 per item (or group of items where it is reasonable in the sole discretion of the People and Performance Manager to group them) are to be reported to the People and Performance Manager upon receipt of item and recorded.

The Appreciations Register is owned and governed by our People and Performance Manager.

Anything over the sum of \$1000.00 needs to also be approved prior to being recorded in the Appreciations Register. This; approval can only be given by our CEO, CFO or COO.

What you should do when offered a gift/incentive/appreciation token that falls within the scope of this Policy:

1. Report item and full details: Company, item, amount, date and reason to the People and Performance Manager:  
[Nicki.Malherbe@cirrusnetworks.com.au](mailto:Nicki.Malherbe@cirrusnetworks.com.au)
2. If over the amount of \$1000.00 discuss the item with your manager to seek approval from the CEO, CFO or COO
3. Upon written confirmation on acceptance status, accept or decline dependant on status outcome
4. Ensure outcome is recorded to the People and Performance Manager.

If you have any questions or require further information regarding Cirrus Networks approach to Anti-Bribery and Corruption, please contact our Chief Financial Officer Matt Green on 0419 920 141.

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