

## Policy: CP1027 Anti-Bribery and Corruption

**Document Date:**  
**September 2023**

Cirrus Networks Holdings Limited (“Cirrus” or “Company”) 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.

This Policy applies to anyone who is employed by or works for or with Cirrus, including:

- All officers (senior management and directors of Cirrus);
- All employees (whether permanent, fixed term or temporary); and
- dealings with contractors, consultants and other third parties on the Cirrus business.

Employees are responsible for reading and understanding how this policy applies to them and their role.

Here at Cirrus 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 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 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 3<sup>rd</sup> 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;
- 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 Human Resources Manager to group them) are to be reported to the Human Resources Manager upon receipt of item and recorded.

The Appreciations Register is owned and governed by our Human Resource Manager; all gifts/incentives/appreciations are to be recorded regardless of value.

Any gift/incentive/appreciation token that is received including or under the sum of \$1,000.00 needs to be reported to the Human Resource Manager upon receipt of item.

Anything over the sum of \$1,000.00 needs to be approved and recorded; approval over this sum can only be given by our CEO or CFO before being entered in the Appreciations Register.

What you should do when offered a gift/incentive/appreciation token:

1. Report item and full details: company, item, amount, date and reason to the Human Resource Manager: [hr@cirrusnetworks.com.au](mailto:hr@cirrusnetworks.com.au)
2. If over the amount of \$1,000.00 discuss the item with your manager to seek approval from CEO or CFO
3. Upon written confirmation on acceptance status, accept or decline dependent on status outcome
4. Ensure outcome is recorded to the Human Resource Manager

The Audit & Risk Committee will be informed of any material breaches of this policy.

This policy will be regularly monitored and reviewed so that it remains effective and appropriate for Cirrus.

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