

ANTI-BRIBERY AND CORRUPTION POLICY (CGPP0003)

Purpose

Premier Fresh Australia, together with all members of the PREMIER group of companies ("PREMIER", "we", "us" or "our"), are committed to fostering a culture of good corporate governance and ethical behaviour. It is PREMIER's policy to conduct all business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption.

The purpose of this policy is to establish standards and controls to ensure compliance with all applicable anti-bribery and corruption regulations, and that the Company's business is conducted in an ethical and lawful manner.

Scope

This policy applies to PREMIER staff, contractors, and consultants of its controlled entities, being an entity where PREMIER holds over 50% of the share capital and Third Parties (direct suppliers) acting for or on behalf of PREMIER. Where PREMIER is involved in a non-controlled joint venture or other similar arrangement where it does not hold a controlling interest, PREMIER will make available its policy and request that the non-controlled entity adopt the key principles as part of its own policy framework. We expect our direct suppliers to be aware of, understand and cascade these requirements to their own supply chain in order to address and protect PREMIER from Bribery and Corruption risks.

Policy

1. Bribery and Corruption

A bribe is the act of favour or monetary gain presented or offered to influence the judgment or conduct of a person. Bribery can include but is not limited to donations, financial rewards, gifts and hospitality, reciprocal favors or opportunities that are promised or provided in order to gain advantage or influence.

Corruption is a form of dishonesty or fraudulent conduct for an individual's private gain and may involve bribery.

PREMIER employees, contractors, consultants and third parties acting on behalf of PREMIER must not engage in any form of bribery or corruption, either directly or indirectly.

PREMIER third parties include direct suppliers and agents involved in facilitating or selling PREMIER products.

2. Gifts and hospitality

PREMIER employees, contractors consultants and third parties acting on behalf of PREMIER must not offer or give any gift or hospitality which could be regarded as illegal or improper, or which violates the recipient's company policies.

PREMIER POLICY & PROCEDURE

PREMIER employees, contractors, consultants and third parties acting on behalf of PREMIER must not accept gifts or hospitality which could be seen as inappropriate and give rise to actual, perceived or potential conflicts of interest.

PREMIER understands that giving and accepting gifts or hospitality is acceptable when done for legitimate purposes such as general relationship building and appreciation. When giving or accepting gifts or hospitality consider whether it complies with the following:

- does not compromise PREMIERs integrity
- no obligation or expectation attached to it
- it is reasonable and proportional to the situation
- it complies with relevant laws

If in doubt, discuss with the manager to determine appropriate action.

3. Charitable contributions

Charitable support and donations are acceptable provided that prior approval of a PREMIER Executive Manager is confirmed. PREMIER employees, contractors, and consultants who give charitable contributions must ensure that they are not a means to conceal bribery.

4. Employee Responsibilities

PREMIER employees, contractors, consultants and third parties acting on behalf of PREMIER are prohibited from engaging in bribery or corruption.

PREMIER employees, contractors, consultants and third parties acting on behalf of PREMIER are required to avoid any activity that might lead to, or suggest, a breach of this policy, and must notify the manager as soon as possible if you believe or suspect that a conflict with or breach of this policy has occurred or may occur in the future.

PREMIER employees who breach this policy will face disciplinary action, which could result in dismissal for gross misconduct. We reserve our right to terminate our contractual relationship with other workers including contractors, consultants and third parties acting on behalf of PREMIER if they breach this policy.

5. Risk Management and Control

PREMIER employees, contractors, consultants and third parties acting on behalf of PREMIER are responsible for the prevention, detection and reporting of bribery and corruption.

PREMIER will take the necessary steps to ensure employees and contractors receive training on this policy and how to seek assistance. Training on this policy forms part of the induction process for all new employees. All existing employees will receive relevant training on how to implement and adhere to this policy.

PREMIER's zero-tolerance approach to bribery and corruption will be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and as appropriate thereafter.

6. Seeking Assistance and Handling of Grievances

PREMIER supports open and transparent working relationships, where concerns can be safely voiced. We encourage all our stakeholders to raise concerns where they observe or suspect adverse impacts on people, communities, or environment within PREMIER's supply chain.

All employees concerned with any issue or suspect breach of this policy at the earliest possible stage are strongly encouraged to raise their concerns with an eligible recipient, their manager, senior manager, nominated Contact Officer or any member of the human resources department, Email: hsupport@premierfresh.com.au. The Whistleblower Policy also provides details on how to report improper conduct if there are any concerns raising the matter with the to an eligible recipient.

All concerns raised are assessed to determine how they should be investigated in line with the Workplace Grievance & Complaints Handling Policy and the Whistle Blower Policy. Where remedy is necessary, this may be provided by PREMIER directly, or in collaboration with third parties. We provide several mechanisms for concerns and complaints to be raised confidentially and/or anonymously. More information can be found in our whistle-blower policy located on Sharepoint or obtainable from a manager, Contact Officer or the human resources department.

7. Protection

PREMIER is committed to the protection of any PREMIER employee, contractor, and consultant who makes a report in good faith under this Policy where they suspect that bribery and corruption may have occurred. Where a report of bribery and corruption is made in good faith, PREMIER will take all reasonable steps to ensure that the person making the report will not be personally disadvantaged or suffer any detriment.

8. Review of this Policy

This Policy will be reviewed at least every 2 years by the Audit Committee in consultation with the Chief Executive.

9. Approval

This Policy and Procedure was reviewed by the Audit Committee and approved by the Board on 27th July 2023.

10. Availability of the Policy and Related Documents

This Policy will be made available on the PREMIER Intranet and website and a written copy will be available on request.

Related Documents

- HRPP0005 Equal Employment: Discrimination, Harassment and Bullying Policy
- HRPP0028 Workplace Grievance & Complaints Handling Policy
- CGPP0004 Whistleblower Policy

Version History and Changes

<p>Current Version:</p>	<p>Changes since version 1 are:</p> <ul style="list-style-type: none"> • Scope extended to include Third Parties (suppliers) acting on behalf of Premier. • Addition of bribery examples. • Specification of third parties. • Provision of considerations when giving or receiving a gift or hospitality. • Addition of statement prohibiting Premier stakeholders in engaging in bribery and corruption. • Amendment of Training and Communication clause to overall Risk Management and Control. • Addition of Premier stakeholders responsibility for risk management. • Removal of Whistleblower contact and replaced with reference to Whistleblower policy. • Addition of information on where the Whistleblower policy can be accessed.
<p>Previous Versions</p>	<p>20th May 2021: CGPP0003 (Version 1) – reviewed and approved.</p>