

## ANTI BRIBERY, CORRUPTION AND FRAUD POLICY

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### 1. PURPOSE

The purpose of this policy is to supplement TasFoods Limited and its subsidiaries (TasFood Group) overall risk management framework to prevent and detect corrupt, illegal or other undesirable conduct and to underpin its values.

The Policy prohibits TasFood Group, its Officers, Employees and Business Partners from engaging in activity that constitutes bribery, Corruption, Fraud or other related improper conduct. It also outlines:

- the responsibilities of TasFood Group and its Employees in observing and upholding the prohibition on bribery, Corruption, Fraud and other related improper conduct; and
- information and guidance on how to recognise and deal with instances of bribery, Corruption, Fraud or other related improper conduct.

The Policy is underpinned by the Code of Conduct and TasFoods values of passion, accountability, respect and trust.

Terms used in this Policy are defined in Section 13.

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### 2. SCOPE

This Policy applies to all of TasFood Group's business and transactions in all countries within which TasFood Group operates, and covers:

- TasFood Group; and
- All directors, officers and employees of TasFood Group (whether permanent, fixed-term, casual, contracting, consulting or temporary) (collectively referred to as "Employees").

Individual and corporate entities associated with TasFood Group, which act for or on behalf of TasFood Group, or who perform functions in relation to or on behalf of TasFood Group, are expected to have and comply with policies managing bribery and corruption risk. This includes, but is not limited to, contractors, consultants, third party agents, distributors and service providers in any of TasFood Group's operations (collectively referred to as "Business Partners").

TasFood Group may request copies of a Business Partner's anti-bribery and corruption policy and related materials. Where TasFood Group identifies that a Business Partner does not have policies managing bribery and corruption risks, or identifies that these policies are inadequate, TasFood Group will communicate that it expects its Business Partners to comply with this Policy.

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### 3. RESPONSIBILITY FOR POLICY COMPLIANCE AND REPORTING

Every person covered by this Policy is required to understand and comply with this Policy and to comply with the reporting requirements set out in this Policy.

Employees should report any breaches or suspected breaches or suspicious activities or payments in accordance with the Code of Conduct or the Whistleblower (Speak Up) Policy.

The Board must be informed of any material breach of this Policy.

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### 4. BRIBERY AND CORRUPTION

Corrupt conduct by TasFood Group and its Employees is absolutely prohibited. TasFood Group and its Employees are not permitted to give, offer, promise, accept, request or authorise, whether directly or indirectly any Bribe, kickback or form of improper payment (however small). Additionally, TasFood Group and its Employees must not, directly or indirectly, authorise, undertake or participate in any form of corrupt business practice including:

- making any Facilitation Payment;
- making any Secret Commission; or
- engaging in Money Laundering.

Under no circumstances will TasFood Group approve of any offers, or make, request or receive an irregular payment or other thing of value, to win business or influence a business decision in TasFood Group's favour. Such actions are in breach of this Policy and may be illegal in jurisdictions in which TasFood Group operates. This prohibition applies to bribery of public officials as well as bribery in respect of any commercial transaction in the private sector.

No Employees or Business Partners will be penalised, or be subject to other adverse consequences, for refusing to pay bribes or engage in any other conduct that would be in breach of this Policy, even if that refusal may affect TasFood Group's business.

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### 5. FRAUD

TasFood Group and its Employees must not, directly or indirectly, authorise, undertake or participate in any form of Fraud.

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### 6. TASFOOD GROUP'S RELATIONSHIPS WITH THIRD PARTIES

Any improper conduct by a third party, including Business Partners, may damage TasFood Group's reputation and expose TasFood Group and its Employees to criminal or civil liability or other sanctions.

This may include liability for the conduct of agents, representatives and associates or those involved in negotiating any business arrangements or transactions including bidding for tenders, negotiating supply contracts, arranging introductions to potential business clients or key government decision makers.

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TasFood Group and its Employees must not:

- enter into or continue a business relationship with a Business Partner if they cannot be satisfied that the entity will behave in a manner consistent with this Policy; or
- engage or make a payment to a Business Partner, or any other third party, knowing or suspecting the Business Partner or third party may use or offer all or a portion of the payment directly or indirectly as a bribe, kickback, secret commission or other form of improper or corrupt payment.

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### 7. GIFTS, ENTERTAINMENT AND HOSPITALITY

TasFood Group prohibits the offering or acceptance of gifts, entertainment, travel or hospitality which are contrary to this Policy, including in circumstances which:

- could be considered to give rise to undue influence or improperly influence a relationship or decision affecting TasFood Group or its business;
- could give rise to the appearance of attempting to secure favourable treatment;
- creates a sense of obligation;
- is more than token value or exceeds common courtesies with accepted business practice; or
- they know or suspect that the recipient cannot accept the gift or benefit pursuant to law or to any duties that they owe others.

Employees must not accept and return all gifts, entertainment and hospitality given or received by an Employee in relation to their role at TasFoods Group and valued at (or estimated to be valued at) \$250 or more.

Gifts, entertainment or hospitality frequently given to or received from the same person or entity or which create an ongoing expectation, and in aggregate exceed \$250, do not comply with this policy.

Employees should, where possible, discuss with their Manager or the Company Secretary the fact that they have been offered or have offered a gift / benefit before making/accepting it, in order to determine the appropriate action.

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### 8. POLITICAL AND CHARITABLE DONATIONS AND COMMUNITY ENGAGEMENT

TasFood Group does not make donations to any political party or to any individual in, or seeking to obtain, political office.

TasFood Group's Donation Policy allows it to support causes and charities. Charitable support and donations are acceptable if approved by the CEO. TasFood Group Employees who wish to make charitable donations or sponsorships on their own behalf must make clear that they are not doing so on behalf of TasFood Group.

TasFood Group will only make charitable donations that are legal and ethical under local laws and practices.

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### 9. RECORD KEEPING

TasFood Group and its Employees must keep accurate and complete accounts, invoices, and other documents and records relating to dealings with any external or third party, which will evidence the business reason for these dealings. No accounts may be kept “off-book” for any reason or treated/managed in a way so as to facilitate, conceal or disguise potential breaches of this Policy or other TasFood Group Policies. Accounts are audited externally as required by the Law.

### 10. TRAINING AND COMMUNICATION

TasFood Group will ensure that Employees (including new Employees), officers and contractors, suppliers and customers are informed about and understand this Policy. Each Employee will have access to this Policy and be provided with training.

A copy of this Policy will also be publicly available on TasFood Group's website.

Any questions about this Policy should be referred to the Company Secretary.

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### 11. BREACHES

Bribery, Corruption, Fraud and other related improper conduct referred to in this Policy may be criminal offences which could have serious consequences for TasFood Group and the individuals involved, including substantial fines and liabilities, imprisonment and reputational damage.

Any breach of this Policy by Employees will be regarded as serious misconduct, leading to disciplinary action which may include termination of employment. Breaching this Policy may also breach applicable anti-corruption laws and expose an individual to criminal and civil liability, which could result in imprisonment or the imposition of a significant financial penalty. Employees should also be aware that TasFood Group's insurance policies may not provide coverage for conduct involving a breach of this Policy.

Employees and Business Partners must cooperate fully and openly with any investigation by TasFood Group into alleged or suspected activity in breach of this Policy.

Any Employee or Business Partner who becomes aware of a breach of this Policy must disclose this breach to their Manager, Manager of Human Resources or the Company Secretary.

In extreme circumstances an individual may be concerned that a serious breach of this Policy has occurred but considers that it would be personally damaging to pursue it through normal channels, in such a case they should report it under the Whistleblowing Policy.

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### 12. RELATED AND SUPPORTING POLICIES

This Policy is supported by, and linked to, specific TasFood Group policies and standards as issued from time to time. These policies and standards include, but are not limited to:

- TasFoods Values;
- Code of Conduct;
- Whistleblower (Speak up) Policy.

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### 13. REVIEWING AND MAINTAINING THE POLICY

The Policy is to be reviewed at least every two years.

Changes to this Policy require Board approval.

### 14. GLOSSARY OF TERMS

Term	Description
<b>TasFood Group</b>	TasFood Limited and its Subsidiaries.
<b>Bribe</b>	<p>A bribe involves (either directly or indirectly) improperly offering or providing a benefit or something of value, either to a public official, someone in business or a close relative of such a person in order to obtain or retain business or an advantage or to induce or reward improper conduct or an improper decision.</p> <p>While a bribe may involve a monetary payment or offer, it covers anything of value such as:</p> <ul style="list-style-type: none"> <li>• cash or cash equivalents (e.g. gift vouchers or loans);</li> <li>• some gifts, hospitality, entertainment or travel;</li> <li>• political or charitable donations or scholarships;</li> <li>• reciprocal favours or the provision of favours (e.g. discounted or 'free' TasFood Group goods or use of TasFood Group's facilities or property);</li> <li>• business and employment opportunities;</li> <li>• anything else that is of significant value to the recipient.</li> </ul>
<b>Business Partner</b>	Has the meaning given in section 2.
<b>Corruption</b>	Any activity in which a person abuses their position and/or trust in order to achieve an improper gain or advantage for themselves or for another person or entity.
<b>Employees</b>	Has the meaning given in section 2.
<b>Facilitation Payment</b>	Any minor payment to a public official either directly or indirectly as an incentive for the public official to facilitate, expedite or secure the performance of a routine government action or process (for example, to facilitate the expedition of applications for licences).
<b>Fraud</b>	Dishonest activity causing actual or potential financial loss to any person or entity - including theft of moneys or other property by Employees, Business Partners or other persons external to the entity - and where deception is used either at the time, immediately before, or immediately following the activity. This also includes the deliberate falsification, concealment, destruction or use of falsified documentation used or intended for use for a normal business purpose or the improper use of information or position for personal financial benefit.
<b>Money Laundering</b>	Concealing the existence of an illegal source of income and disguising that income to make it appear legitimate.

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<b>Policy</b>	Has the meaning given in section 1.
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Term	Description
<b>Secret Commissions</b>	<p>Benefits that are given, offered, received or solicited by an agent or representative of another person or entity, where that benefit is:</p> <ul style="list-style-type: none"> <li>a) not disclosed to the principal; and</li> <li>b) given, offered, received or solicited as an inducement or reward for providing or having provided a favour, or the receipt of which would tend to influence the provision of a favour.</li> </ul> <p>For example, a payment to an agent of a customer or supplier where that agent does not disclose that payment to the customer or supplier, and in return, the agent facilitates favourable commercial terms with that customer or supplier.</p>

