



## 1. BACKGROUND

APCD Pty Ltd is committed to continually operate as a responsible corporate citizen. This requires APCD management, employees, and contractors to the company to conduct all business activities with integrity, corporate responsibility and honesty, and within the law of Australia and other countries in which it might operate.

These foundations must guide all APCD business policies, plans, initiatives, decisions, and relations, both internal and with clients, customers, and other stakeholders. In light of this, and as it expands its national and international business network, it is imperative that APCD complies with anti-corruption laws and regulations within all legal jurisdictions where its business is conducted.

## 2. PURPOSE

The purposes of this Policy are:

- State APCD's stance on corrupt business practices and behaviours;
- State the expected responses and standards from Directors, managers, and employees (including all contractors to the company);
- Encourage lawful commercial practices in its dealings with clients, customers, government, and competitors.

## 3. SCOPE

The scope of this Policy encompasses:

- All APCD business activities, dealings and processes;
- Directors, all employees, all contractors and consultants, and agents to the company;
- Relations with government, clients and customers (and their agents), and suppliers.

Currents legal frameworks that guide this scope are:

- Criminal Code Act 1995 (Cth)
- Corporations Act 2001 (Cth)
- OECD Convention on Combating Bribery of foreign Public Officials in International Business Transactions (1999).
- Relevant corruption/bribery laws of countries in which APCD might operate from time to time.



## ANTI-CORRUPTION POLICY STATEMENT

It is the business of APCD Pty Ltd to:

- Market and provide a comprehensive range of IT services to our clients
- Collect, register, assess, report, and refurbish end of life, superseded and excess IT assets
- Package, re-market, and dispatch quality IT assets through national and international networks of resellers.
- Conduct its business in an ethical, trustworthy, and reliable manner and as an acknowledged good corporate citizen.

APCD will not allow, condone, and/or accept bribery or any other form of corrupt relations, practices, and behaviour in its business dealings.

Specifically, the company prohibits its employees, contractors, consultants, and agents from misusing the company's reputation, assets, resources (including material, financial, and personnel) for personal benefit and/or the benefit of others.

In addition, no employee has the authority to accept or propose sponsorship or "backing" deals or opportunities to make financial and/or material donations to third parties. Such matters, when they arise, must be directed to the Managing Director for consideration and decision.

APCD regards failure to comply with this Policy, either directly or indirectly, as grave breaches. These might lead to punitive action, including dismissal/contract termination. Employees, and Contractors, Consultants, and/or agents to APCD who become aware of or suspect instances which contravene, or might contravene, this Policy are required to report such instances, in confidence, to the Managing Director.

Mario Cuda  
Managing Director  
APCD Pty Ltd

Geoffrey Glenwright  
Chief Financial Officer  
APCD Pty Ltd

### 4. MANAGEMENT RESPONSIBILITY

The Chief Financial Officer, as delegated by the Managing Director, is responsible for:

- The implementation and ongoing administration of this policy;
- The first line of communications and authority on all matters relating to this policy;
- The continuous assessment of the policy's effectiveness;
- Monitoring compliance to the policy including formal auditing within the ESM & QSM Internal Auditing programme.



## **5. EMPLOYEE & THIRD PARTY POLICY COMMUNICATIONS, AWARENESS & TRAINING**

All existing Employees and, during their induction programme, new Employees are required to read the Policy Statement, and to date and sign a copy as indication of agreement. These will be stored in Company Personnel Files.

Third parties, encompassing Consultants, Contractors, and Company agents, and (when entered into) project joint partners also required read and sign the Policy Statement as indication of agreement. These copies will be kept in the relevant files.

The Policy Statement and its application in effective business conduct within APCD are permanent topics within the Company Training Programme (ISO 9001:2008, R/14).

Employees are required to apply the principle “If Unsure, Stop, Seek Clarification” to those business matters which contravene this Policy. Such matters include (though not limited to):

- Receipt or giving of gifts (cash and/or in kind)
- Use of company assets and resources
- Charitable and/or political contributions
- Payments that might to considered “kickbacks”
- The offer and/or payment of meals, accommodation, entertainment of government personnel and existing or prospective clients/customers/ business influencers.
- Requests for/offers of, payment to facilitate business advantage.

Where required, clarification and direction must be sought from the Chief Financial Officer.

## **6. DISCIPLINARY ACTIONS**

APCD will take punitive action against those Employees who contravene the terms of the Anti-Corruption Policy, who are found to be aware of, but do not advise the Managing Director of likely contraventions, and/or who deliberately impend investigation of contraventions (likely or actual).

## **7. REFERENCE**