

<b>Document title:</b>		Anti-Bribery and Anti-Corruption Policy
<b>Approving authority:</b>		Board of Directors
<b>Related policies:</b>		Conflict of Interest Policy Employee Code of Conduct and Ethics Policy Professional Conduct Management Policy Australian Business Compliance Policy Board Governance and Oversight Policy
<b>Next review:</b>		01/06/2026
<b>Version</b>	<b>Release date</b>	<b>Comment</b>
V1.0	01/06/2023	Initial release

## 1. Purpose

The purpose of this Anti-Bribery and Anti-Corruption Policy is to provide guidelines for all employees, contractors, and other stakeholders of ITAC to prevent, detect, and respond to bribery and corruption activities. This policy aims to promote a culture of transparency, integrity, and compliance with all applicable laws and regulations.

## 2. Scope

This policy applies to all employees, contractors, and other stakeholders of ITAC, including its subsidiaries and affiliated entities, regardless of their location or role within the organization.

## 3. Definitions

**Bribery:** The act of offering, giving, receiving, or soliciting something of value to influence an individual's actions or decisions in favour of the bribe giver.

**Corruption:** The misuse of entrusted power for personal gain, including bribery, embezzlement, fraud, and other dishonest practices.

## 4. Compliance with Laws and Regulations

ITAC is committed to complying with all applicable anti-bribery and anti-corruption laws and regulations, including the Australian Criminal Code Act 1995. All employees, contractors, and stakeholders must be aware of and adhere to these legal requirements.

## **5. Prohibited Conduct**

All employees, contractors, and stakeholders are strictly prohibited from engaging in the following activities:

- Offering, giving, receiving, or soliciting bribes or kickbacks, either directly or indirectly
- Engaging in any form of corruption, including embezzlement, fraud, or dishonest practices
- Facilitating or condoning any act of bribery or corruption by a third party

## **6. Reporting and Whistleblowing**

All employees, contractors, and stakeholders are encouraged to report any suspected or actual breaches of this policy to ITAC management or through an appropriate whistleblowing channel. ITAC is committed to maintaining a supportive environment for whistle-blowers and ensuring that they are protected from any form of retaliation or adverse consequences.

## **7. Training and Awareness**

ITAC will provide training and resources to ensure that all employees, contractors, and stakeholders are aware of this policy and understand their responsibilities under it.

## **8. Monitoring and Enforcement**

ITAC management is responsible for monitoring compliance with this policy and taking appropriate action in response to any breaches. This may include disciplinary action, up to and including termination of employment or contracts, as well as reporting any unlawful conduct to the relevant authorities.

## **9. Policy Review**

This Anti-Bribery and Anti-Corruption Policy will be reviewed periodically to ensure it remains current, effective, and compliant with relevant laws and regulations. Any changes to the policy will be communicated to all employees, contractors, and stakeholders.

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