

ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

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Transforming
Visions into
Reality



buildix
Consultants

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1 Purpose

Buildix Consultants is committed to conducting business with integrity, transparency, and accountability. This Anti-Bribery and Anti-Corruption Policy sets out our zero-tolerance approach to bribery and corruption and provides guidance to all employees, contractors, consultants, directors, and business partners on how to identify and deal with bribery and corruption risks.

2 Scope

This policy applies to:

- All employees, directors, and officers of Buildix Consultants;
- Contractors, consultants, temporary staff, and interns;
- Third parties acting on behalf of Buildix Consultants, including agents, suppliers, subcontractors, and joint venture partners.

3 Definitions

- **BRIBERY:** Offering, promising, giving, accepting, or soliciting anything of value to influence a decision or gain an improper advantage.
- **CORRUPTION:** Abuse of entrusted power for private gain, including bribery, kickbacks, facilitation payments, and conflicts of interest.
- **FACILITATION PAYMENTS:** Small, unofficial payments made to expedite routine government actions (e.g. issuing permits). These are prohibited under this policy.

4 Policy Statement

Buildix strictly prohibits all forms of bribery and corruption. Specifically:

- Do not offer, give, solicit, or accept bribes in any form, whether directly or indirectly.
- Do not make facilitation payments, regardless of local customs or practices.
- Do not provide gifts, hospitality, or entertainment that could be interpreted as a bribe.
- Do not ignore or fail to report any suspicions of bribery or corruption.

All business dealings must be based on merit, transparency, and legitimate business purposes.



5 Gifts, Hospitality, and Entertainment

Buildix permits reasonable and proportionate gifts and hospitality only where they:

- Are of modest value and not cash or cash equivalents;
- Are not intended to influence or reward a business decision;
- Are offered in good faith and comply with local laws;
- Are disclosed to and approved by a director if above a certain threshold (e.g. \$100 AUD).

Employees must record gifts and hospitality in the Gift & Hospitality Register.

6 Third Parties and Business Partners

Buildix expects all third parties acting on its behalf to uphold the same standards of integrity. Before engaging third parties:

- Conduct due diligence to assess corruption risk;
- Include anti-bribery and corruption clauses in contracts;
- Monitor their ongoing compliance.

7 Responsibilities

- Directors: Provide oversight, set the tone from the top, and ensure policy implementation.
- Employees and Contractors: Comply with the policy and report concerns.
- Managers: Promote awareness and ensure their teams understand and follow the policy.

8 Reporting and Whistleblowing

Suspected or actual breaches of this policy must be reported immediately to a Director or via the Buildix Whistleblower process. Buildix strictly prohibits retaliation against individuals who report misconduct in good faith.

9 Training and Awareness

Buildix will provide training and communications to relevant staff to ensure they understand the risks and their obligations under this policy.

10 Breaches and Consequences

Violations of this policy are considered serious misconduct and may result in:

- Disciplinary action, including termination of employment or engagement;
- Contract termination for third parties;
- Referral to regulatory authorities or law enforcement.



11 Review and Updates

This policy will be reviewed annually and updated as required to reflect changes in laws, regulations, and organisational practices.

For any questions regarding this policy, please contact the Directors of Buildix Consultants.

Document prepared by

Buildix Consultants Pty Ltd

ACN 684 326 609

Brisbane, Qld

W buildixconsultants.com

