# **RESIMAC GROUP LTD**

# Anti-bribery and corruption policy

August 2023



### **Contents**

Introduction	_ 3
Scope	_ 3
Bribery and corruption	_ 3
Policy statement	_ 3
Roles and responsibilities	_ 3
Compliance	_ 3
Definitions and key terms	_ 3

COMMERCIAL IN CONFIDENCE: The information contained in this document is confidential and proprietary to Resimac Group Limited ("Resimac"). It must be held in strict confidence and not disclosed, duplicated or used in whole or in part for any purpose without the written consent of Resimac. Every attempt has been made to ensure the information contained herein has been obtained from reliable sources. Resimac does not guarantee the accuracy or completeness of the information presented and accepts no liability for any loss or damage arising in connection with the use of the information.

### **Introduction**

The purpose of this policy is to ensure that all Resimac persons are aware of and adhere to Resimac's position on bribery and corruption.

### **Scope**

This policy applies to all Resimac persons.

# **Bribery and corruption**

Bribery is a type of corruption involving the giving or receiving of a benefit (such as money, property, a discount or favour) with the aim of influencing a person's decision. Corruption is the illegitimate use of power for personal gain.

# **Policy statement**

Resimac strictly prohibits all forms of bribery and corruption.

# **Roles and responsibilities**

ROLE	RESPONSIBILITY
All Resimac persons	<ul> <li>Must understand and comply with this policy.</li> <li>Must communicate any non-compliance with this policy to Compliance immediately.</li> </ul>
All Resimac employees	Must complete the mandatory training assigned on bribery and corruption.
Group Head of Compliance & Enterprise Risk	<ul> <li>Must issue all Resimac employees with training on bribery and corruption.</li> <li>Must ensure that this policy is updated every two years or when there is a material change to the Group's compliance obligations.</li> </ul>

# **Compliance**

Any Resimac employee found to have breached this policy may be subject to disciplinary action, up to and including termination of their employment.

### **Definitions and key terms**

TERM	DEFINITION
Bribery	Bribery is a type of corruption involving the giving or receiving of a benefit (such as money, property, a discount or favour) with the aim of influencing a person's decision.
Corruption	Corruption is the illegitimate use of power for personal gain.
Resimac Group	Refers to Resimac Group Ltd and all its subsidiaries. Also referred to as 'Resimac', 'the Group', 'we' and 'our.
Resimac persons	Means all employees, directors, officers, and Third Parties performing services for or on behalf of Resimac.
Third Party	Means any person or entity in a commercial relationship with Resimac, other than customers and employees.