

Bribery and Anti-Corruption Policy

Item(s) New Policy	Doc No: 1
Superseded:	Version: 1
Developed by: Human Resources	Date: 11 Sep. 21
Authorised by: CEO	Pages 3

1. Ascention Purpose Statement

1.1 Ascention applies a “zero tolerance” approach to acts of bribery and corruption by any of our employees, officials or third-party representatives.

Ascention has a well-established reputation for conducting business in an ethical and honest way. This reputation is built on our company value of Integrity, which is a major, underlying theme found in our values. Ascention observes the highest integrity standards in all our business transactions. In addition to observing all applicable local, state, federal and country laws and regulations, we must uphold our company’s integrity standards, even when they are more demanding than local customs or practices.

Bribery and corruption are morally wrong, negatively affect societies and could seriously damage Ascention reputation. Bribery is a criminal offence, and any corrupt act exposes Ascention and its employees to the risk of prosecution, fines and imprisonment.

Any breach of this policy will be regarded as a serious matter by Ascention and will result in disciplinary action up to and including termination of employment or termination of a contractual relation with any third party.

2. Scope

2.1 This policy applies to all officers, employees (including Directors, executives and managers) and contractors of Ascention. Ascention also requires contractors, sub- contractors, agents and other personnel required to perform work to adhere to this Policy.

2.2 Any irregularity or suspected irregularity involving a shareholder, vendor, consultants or any other third party agencies doing business with Ascention or its officers, employees or contractors, is included in the scope of this policy.

2.3 The policy does not have regard to the officer's, employee's or contractor's length of service, title or relationship to Ascention.

3. Responsibility

3.1 The key responsibilities of Ascention employees are summarised below:

- Complying with Ascention policies and procedures and for being alert to any behaviour or actions that are inconsistent with Ascention’s policies and procedures; and
- Notifying their manager of any suspected bribery and corruption.
- Monitoring and supervising Ascention Persons’ conduct, Including their discharge of any delegated authority, in line with all applicable policies; and

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- Raising awareness in relation to prevention and detection of bribery or corruption;
- Fostering an environment within their function/business area of responsibility that makes active bribery and corruption control a responsibility of all employees;
- Articulating and reinforcing clear standards and procedures to deter bribery and corruption, including appropriate education and training of employees;
- Implementing any directions in relation to the prevention and detection of bribery and corruption; and
- Reporting all known instances of suspected bribery and corruption.

4. What is Bribery and Corruption?

4.1 Bribery is an act of direct or indirect offering, promising, making, authorising, providing, requesting, agreeing to receive, or accepting, directly, or indirectly through third parties, any payment, gift, or anything of value, for the purpose of unlawfully obtaining, retaining, or gaining an advantage in business. Bribes can take on many different shapes and forms, but typically there will be a “*quid pro quo*” – meaning that both parties, or a party’s designate, will benefit. Examples of a bribe include, but are not limited to:

– the direct or indirect promise, offering, or authorisation, of anything of value (whether the value is material or not);

– the offer or receipt of any kickback, loan, fee, reward or other advantage; or – the giving of aid, donations or voting, designed to exert improper influence.

4.2 Acts of bribery are designed to influence individuals to act dishonestly in the performance or discharge of their duty. For the purposes of this policy, whether the target of the act of bribery works in the public or private sector is irrelevant. Corruption is the misuse of office or power or influence for private gain.

5. Who may be guilty of or liable for Bribery and Corruption offences? 5. Who may be guilty of or liable for Bribery and Corruption offences?

5.1 Bribery and corruption may be committed by any:

- Ascention employee, officer or director; or
- person acting on behalf of another (i.e. a third-party individual); or
- organisation acting on behalf of Ascention or representing Ascention in a market (i.e. a third-party contractor or representative, distributor or agent); or
- any person or organisation which authorises, permits or facilitates others to carry out such acts.

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5.2 People who are likely to be approached with bribes or corrupt conduct are generally those who are able to obtain, retain or direct business, or government officials involved in some aspect of the regulation or purchase of a company's products and services, for example, tendering and contracting, or the handling of administrative tasks such as licenses, customs, taxes or import/export matters.

6. Key Risk Areas for Bribery and Corruption

6.1 Gifts, Entertainment and Hospitality

Gifts, entertainment and hospitality include the receipt or offer of gifts, meals or tokens of appreciation and gratitude, or invitations to events, functions, or other social gatherings, in connection with matters related to our business. These activities are acceptable provided they:

- are of nominal value and fall within reasonable bounds of value and occurrence as defined by Ascention policies;
- do not intend to influence, do not influence or are not perceived to influence, objective business judgement or decisions; and
- are consistent with industry practices, all applicable laws and all Ascention policies and procedures.

6.2 Ascention Persons must not accept gifts or entertainment where to do so might influence, or be perceived to influence, objective business judgement or decisions.

7. How to Raise a Concern

7.1 All Ascention Persons have a responsibility to help detect, prevent and report instances not only of bribery and corruption, but also of any other suspicious activity or wrongdoing in connection with Ascention's business. Ascention is committed to ensuring that all Ascention Persons have a safe, reliable, and confidential way of reporting any suspicious activity.

7.2 Ascention Persons should report the issue/concern directly to the COO and CEO in the first instance, via telephone, email, or in person. If they feel comfortable to do so, this should be done with a copy to their manager or another manager.

If Ascention Persons do not feel comfortable advising a manager or would prefer their report to be anonymous and/ or confidential, concerns can also be reported via People and Culture Director.

7.3 In the event that an incident of bribery, corruption, or wrongdoing is reported, Ascention will act as soon as possible to evaluate the situation. Ascention has clearly defined procedures for investigating anti-bribery and corruption, fraud, misconduct and non-compliance issues and these will be followed in any investigation of this kind. This includes keeping all investigations and reporting confidential and on a 'needs to know' basis only.