
Anti-Bribery and Corruption Policy

1. PURPOSE

Kangaroo Island Plantation Timbers Limited (KPT or “the Company”) is committed to facilitating a culture of honest and ethical behaviour, corporate compliance and good corporate governance. KPT encourages the reporting of suspected unethical, illegal, corrupt, fraudulent or undesirable conduct involving its business.

High standards of ethical behaviour and compliance with laws and regulations are essential to protecting the reputation and long-term success of KPT’s business. KPT is aware that any incident of Bribery or Corruption involving, or relating to, the Company would cause damage to reputation, impede business growth and potentially affect the Company’s share price.

The purpose of this Policy is to set out the Company’s committed opposition to Bribery and Corruption and to ensure all Employees, Directors, Contractors, Consultants, Third Parties and Associated Persons understand their individual responsibilities for compliance in connection with the Company’s business and operations. The main objective of the Policy is to support the maintenance of a robust culture of integrity, transparency and compliance, which is critical to long term success and value preservation in the business.

This Policy also serves to safeguard and make transparent relationships of Directors and employees with external parties in the context of receiving and giving hospitality, gifts and other financial benefits for legitimate purposes consistent with normal business practice.

This policy is available on the website of Kangaroo Island Plantation Timbers Ltd.

This Policy supplements any other policies applicable to Kangaroo Island Plantation Timbers Ltd.

2. SCOPE

This Policy applies to Employees, Directors, Contractors, Consultants, Third Parties and Associated Persons in connection with KPT’s business and operations. It is the responsibility of each Employee, Director, Contractor and Consultant to be aware of and compliant with this Policy.

3. MAKING OR RECEIVING BRIBES

The Company expressly forbids:

- (a) making, offering or promising to make a payment or transfer anything of value, including the provision of any service, gift, meal or entertainment, to government officers and other officials for the purpose of improperly influencing, obtaining or retaining business, or for any other improper purpose or business advantage; or
- (b) making improper payments as described above, through third parties; or
- (c) offering or giving Facilitation Payments, (even if the conduct is customary) or payment of cash or cash equivalents to a government officer.

Bribes can take the form of cash, gift cards, entertainment, travel allowances, hospitality including flight upgrades and hotel rooms, discounts, perks and benefits to relatives of an employee, charitable or political contributions and stakeholder expenses including fees where a fee is not legitimately due. Kickbacks and secret commissions such as undisclosed transactions of value offered in order to influence an outcome are also Bribes.



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Employees, Contractors and Consultants should avoid the appearance of receiving and paying items of any value, such as meals and entertaining or gift giving to improperly influence the recipient's business decisions. Under no circumstances should hospitality, gifts, or other financial benefits be given or received as a "quid pro quo" to improperly influence or obtain unfair advantage.

4. MAKING FACILITATION PAYMENTS

Facilitation Payments are generally for small amounts and often occur in dealings with customs, immigration or tax officials, when obtaining permits, licenses or other government papers, as an inducement or "grease" for securing or expediting a routine government action which the government officer is ordinarily obliged to perform.

The making of Facilitation Payments is prohibited under this Policy. This position is in keeping with the majority of other developed nations and their anti-corruption and anti-bribery regimes, in which Facilitation Payments constitute criminal activity.

5. OTHER CONDUCT – FINANCIAL BENEFITS

The following general principles apply to financial benefits which are not Bribes:

- (a) there must be a legitimate business purpose that justifies the giving or the receiving of hospitality, gifts, or other financial benefit as an expression of appreciation of an ongoing relationship; the recipient must not be placed under any obligation to give or do anything in return;
- (b) gifts should never be given or received in cash or cash equivalents (e.g. gift cards);
- (c) gifts, entertainment and hospitality offered by the Company should be aligned to the Code of Conduct, in terms of good taste and reflecting the professionalism and integrity of the Company, and
- (d) all hospitality, gifts, or other financial benefits received and given by employees must be fully and accurately documented in a transparent way to void the appearance of impropriety.

The Company Secretary should at least annually monitor the register to ensure that gifts and their frequency or regularity may not compromise the Company's reputation of integrity, transparency and being free of undue influence.

6. REPORTING AND INVESTIGATING BREACHES AND SUSPECTED BREACHES

All employees are responsible for reporting breaches or suspected breaches of this Policy, or any other conduct involving Bribery or Corruption which is not stipulated in this Policy, pursuant to the Company's Whistleblower Policy. All safeguards in terms of confidentiality and the ongoing support and protection of the Company provided for in that Policy will apply in these circumstances.