

# **Anti-Bribery and Corruption Policy**

## **Policy Statement**

JSK Holdings Pty Ltd does not permit any form of bribery and corruption and applies a 'zero tolerance' to any form of bribery and corruption in the conduct of its activities. No employee will suffer adverse consequences for refusing to participate in an act of bribery or corruption, or for reporting, in good faith, suspected instances of bribery or corruption.

We are committed to ensuring that the decisions and actions taken by our employees and contractors reflect the highest standards of integrity.

## Scope

This policy applies to:

- Workers of JSK Holdings (including permanent, casual, and management)
- Visitors and customers who enter any of JSK Holdings' workplaces.
- Contractors, sub-contractors, and their workers.

# **Guiding Principles**

#### Reporting bribery and corruption

Employees must immediately report any actual or suspected instances of bribery or corruption, so that appropriate action can be taken.

#### Compliance with laws and regulations

JSK Holdings is committed to ensuring compliance with all relevant anti-bribery and anti-corruption laws and regulations.

Employees must ensure that they avoid reaching any agreement, or exchanging any competitively sensitive information, whether directly or indirectly, or any other action, which could imply unlawful coordination when dealing with competitors, customers, suppliers, joint venture partners and other third parties.

Serious criminal and civil penalties may be incurred where laws and regulations are not complied with, and breaches may damage JSK Holdings' reputation and standing in the community.



#### Conflicts of interest

Employees must avoid actual, perceived, or potential conflicts between their personal interests and any business decision that they are involved in on behalf of JSK Holdings.

Employees must not be involved in any conduct or activity that may compromise their ability to make impartial business decisions.

#### Gifts, entertainment, and hospitality

The giving and receiving of gifts, entertainment or hospitality may create a risk of bribery and corruption and must never unduly influence business decision making or bring disrepute to those involved.

#### Dealings with third parties

JSK Holdings recognises that through their actions, subcontractors, suppliers, business partners and other third parties (parties) can directly impact the financial performance and profitability of JSK Holdings as well as its reputation.

As such, JSK Holdings seeks relationships with external parties that share the Company's commitment to lawful business practice conducted to a high standard of ethical behaviour and conduct.

To ensure that these standards are met, employees are expected to carry out necessary checks to ensure that:

- The external party is reputable, competent, and qualified to do the work
- The compensation that is being sought reflects a fair value for the services and goods provided
- The proposed arrangement complies with all applicable laws
- There is no conflict of interest that would make the engagement of the party inappropriate
- The party understands the Company's expectations

**Daljeet Singh** 

Director