



ANTI-BRIBERY & CORRUPTION POLICY

1. PURPOSE

Kinetic IT is committed to integrity and the effective management of bribery and corruption risks. This Anti-Bribery and Corruption (ABC) Policy (**the Policy**) outlines our controls and approach, aligned to our Risk Appetite & Tolerance Statement.

The operational requirements for implementing this Policy are set out in supporting documents, including the ABC Process and ABC Supplier Onboarding Guide.

2. SCOPE

The Policy applies to all Kinetic IT operations and activities. It covers directors, employees, contractors, labour-hire personnel, consultants and any other person acting for or on behalf of Kinetic IT, including agents and business partners where relevant.

Compliance with this Policy is mandatory for all Kinetic IT personnel. Suppliers and business partners are expected to uphold comparable standards when engaging with or representing Kinetic IT, proportionate to risk and supported by contractual and due diligence measures.

3. OBJECTIVES

Kinetic IT aims to:

- effectively prevent, detect and respond to bribery and corruption risks;
- apply risk-based systems and controls aligned to Kinetic IT's risk profile, with enhanced controls where circumstances warrant;
- ensure compliance with all applicable bribery and corruption legislation;
- embed ethical conduct and accountability across our dealings with customers, suppliers and partners; and
- support timely, fair and confidential reporting and investigation of concerns.

4. KEY PRINCIPLES

Kinetic IT has **zero-tolerance** for bribery and corruption. Bribes must not be offered, given, requested or accepted on Kinetic IT's behalf, whether directly or indirectly.

The Policy is based on the following principles:

- **No improper influence:** Gifts, hospitality, donations, sponsorships, political contributions or other benefits must never be used, or perceived to be used, to improperly influence decisions.
- **No facilitation payments:** Facilitation payments (any payment or benefit given to a public official to improperly secure or expedite a routine governmental action) are prohibited, except where a personal safety exception applies and the matter is reported promptly.

- **Third-party integrity:** Kinetic IT applies risk-based due diligence and contractual safeguards to suppliers, subcontractors, agents and partners, particularly where they interact with customers or public officials on our behalf.
- **Accurate records:** All transactions must be recorded accurately and transparently. Undisclosed or off-book transactions are prohibited.
- **Speak up culture:** Everyone is expected to report suspected bribery or corruption and cooperate with investigations. Retaliation against anyone who raises a concern is not tolerated.

5. ROLES AND RESPONSIBILITIES

ROLE	RESPONSIBILITY
Board of Directors and Chair	• Oversee ABC governance and ethical conduct.
Chief Executive Officer (CEO) and Executive Leadership Team (ELT)	• Demonstrate leadership commitment to ethical conduct and integrity. • Ensure sufficient resourcing and effective implementation of ABC controls. • Monitor and address material bribery and corruption risks and incidents.
Legal	• Own and maintain the Policy framework. • Advise on bribery and corruption obligations and support incident response. • Coordinate periodic assessments of ABC risk exposure. • Oversee ABC provisions in contracts and higher-risk arrangements. • Monitor legislation changes to ensure compliance with bribery and corruption obligations.
Procurement	• Implement risk-based due diligence for supplier onboarding and engagement. • Ensure contracts include appropriate bribery and corruption protections. • Oversee supplier performance and address ABC-related issues.
Finance	• Ensure accurate and transparent accounting and record-keeping. • Implement and monitor financial controls relating to payments and incentives. • Escalate anomalies or red flags that may indicate bribery or corruption risk.
People & Culture	• Integrate ABC requirements into onboarding and employee lifecycle processes. • Support delivery of training and awareness programs. • Administer disciplinary processes for breaches of this Policy.
All Kinetic IT (including suppliers, contractors, subcontractors, agents and partners)	• Act in accordance with this Policy and complete mandatory ABC training. • Disclose and manage actual or potential conflicts of interest. • Decline and promptly report any suspected bribery, corruption or improper benefit.

6. BRIBERY & CORRUPTION RISKS IN OPERATIONS

Bribery and corruption risks may arise in activities such as tendering, gifts and hospitality, third-party engagements, procurement and subcontracting, and any dealings involving foreign public officials or overseas delivery.

Operational controls (proportionate to risk) include the following:

- approval frameworks for gifts, hospitality and other benefits;
- due diligence for higher-risk third-party engagements;
- ABC contractual protections with suppliers and partners;

- role-appropriate training and ongoing awareness activities; and
- confidential reporting channels and investigation processes.

7. BRIBERY & CORRUPTION RISKS IN SUPPLY CHAIN

Supply-chain risks may arise where third parties engage with customers or public officials, participate in tender activity, or influence procurement outcomes.

Accordingly, suppliers and business partners are expected to comply with the following minimum standards, applied on a risk-based basis:

- **No bribery or kickbacks:** Suppliers must not offer, give, request or accept bribes, kickbacks, secret commissions or other improper advantages in connection with Kinetic IT.
- **No facilitation payments:** Suppliers must not make facilitation payments on Kinetic IT's behalf, except where strictly necessary to protect personal safety and reported immediately.
- **Gifts & hospitality controls:** Any gifts or hospitality offered to or from Kinetic IT personnel must be in compliance with Kinetic IT's [Gifts and Hospitality Policy](#).
- **Accurate invoicing and records:** All charges must be legitimate, properly supported and accurately described. Vague fees or unexplained commissions are not permitted.
- **Conflicts disclosure:** Suppliers must disclose any actual or potential conflicts that could affect impartiality.
- **Due diligence and audit cooperation:** Suppliers must provide information reasonably required for ABC due diligence and cooperate with audits or investigations relating to bribery and corruption risk.

8. NON-COMPLIANCE WITH THE POLICY

Kinetic IT expects its employees, suppliers, contractors, subcontractors, agents and partners to promptly report any actual or suspected breach of the Policy, including attempted bribery, facilitation payment requests, or the falsification or misrepresentation of records.

Reports must be made promptly. Reporting channels are detailed below in section 8.1.

8.1 REPORTING OPTIONS

Reports may be made via general reporting channels or, if eligible, as a disclosure under the Kinetic IT [Whistleblower Protection Policy](#) (Whistleblower Policy).

GENERAL REPORTING

Where a report is not made under the Whistleblower Policy, it must be raised through one of the following channels:

- any member of Kinetic IT's Executive Leadership Team; or
- any member of the Legal or People & Culture teams.

REPORTING UNDER WHISTLEBLOWER PROTECTION POLICY

- Disclosures may be made under Kinetic IT's Whistleblower Protection Policy, and legal protections, including confidentiality and protection from detriment, may apply where the disclosure is made in accordance with that Policy.
- Further details on making a disclosure are set out in the Whistleblower Policy.

8.2 PERSONAL SAFETY EXCEPTION (FACILITATION AND EXTORTION)

Where there is an immediate threat to personal safety, individuals should prioritise safety and report the incident immediately, including details of any facilitation or extortion demand. Facilitation payments should otherwise be resisted and reported in line with internal controls.

8.3 CONSEQUENCES OF NON-COMPLIANCE

- Non-compliance with the Policy may result in disciplinary action, including termination of employment or engagement. Kinetic IT may report suspected unlawful conduct to relevant authorities and will cooperate with any regulatory or law enforcement investigations.
- Foreign bribery offences under Australian law carry substantial penalties for both individuals and corporations, including liability for failing to prevent bribery by associates.

8.4 CONSEQUENCES FOR SUPPLIERS/PARTNERS

Kinetic IT reserves the right to suspend or terminate supplier or partner relationships in response to bribery and corruption breaches, including suspected misconduct.

9. RELATED DOCUMENTS

This Policy is supported by operational processes, standards, tools and guidance documents that set out how ABC requirements are implemented in practice, including:

DOCUMENT

[Code of Conduct.](#)

[Supplier Code of Conduct](#)

[Whistleblower Protection Policy](#)

[Gifts, Benefits & Hospitality Policy](#)

[Procurement Process](#)

[Supplier Selection Process](#)

[Delegations of Authority \(DoA\)](#)

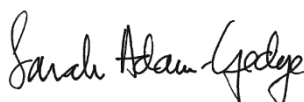
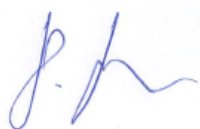
[Risk Appetite & Tolerance Statement](#)

[Probity Process](#)

ABC Process

ABC Supplier Onboarding Guide

ABC Risk Assessment Tool (Supplier Onboarding)



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