

## CGPP0003 ANTI-BRIBERY AND CORRUPTION POLICY

### Purpose

LaManna Premier Group Pty Ltd (**LPG**) is committed to fostering a culture of good corporate governance and ethical behaviour. It is LPG's policy to conduct all business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption.

The purpose of this policy is to establish standards and controls to ensure compliance with all applicable anti-bribery and corruption regulations, and that the Company's business is conducted in an ethical and lawful manner.

### Scope

This policy applies to LPG staff, contractors, and consultants of its controlled entities, being an entity where LPG holds over 50% of the share capital. Where LPG is involved in a non-controlled joint venture or other similar arrangement where it does not hold a controlling interest, LPG will make available its policy and request that the non-controlled entity adopt the key principles as part of its own policy framework. We expect our direct suppliers to cascade these requirements to their own supply chain.

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### Policy

#### 1. Bribery and Corruption

A bribe is the act of favour or monetary gain presented or offered to influence the judgment or conduct of a person. Corruption is a form of dishonesty or fraudulent conduct for an individual's private gain and may involve bribery.

LPG employees, contractors, and consultants must not engage in any form of bribery or corruption, either directly or indirectly.

#### 2. Gifts and hospitality

LPG employees, contractors, and consultants must not offer or give any gift or hospitality which could be regarded as illegal or improper, or which violates the recipient's company policies.

#### 3. Charitable contributions

Charitable support and donations are acceptable provided that prior approval of an LPG Executive Manager is confirmed. LPG employees, contractors, and consultants who engage with charitable contributions must ensure that they are not a means to conceal bribery.

#### 4. Employee Responsibilities

LPG employees, contractors, and consultants are required to avoid any activity that might lead to, or suggest, a breach of this policy, and must notify the manager as soon as possible if you believe or suspect that a conflict with or breach of this policy has occurred or may occur in the future.

LPG employees who breach this policy will face disciplinary action, which could result in dismissal for gross misconduct. We reserve our right to terminate our contractual relationship with other workers including contractors and consultants if they breach this policy.

## 5. Training and communication

Training on this policy forms part of the induction process for all new employees. All existing employees will receive relevant training on how to implement and adhere to this policy.

LPG's zero-tolerance approach to bribery and corruption will be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and as appropriate thereafter.

## 6. Seeking Assistance and Handling of Grievances

LPG supports open and transparent working relationships, where concerns can be safely voiced. We encourage all our stakeholders to raise concerns where they observe or suspect adverse impacts on people, communities, or environment within LPG's supply chain.

All employees concerned with any issue or suspect breach of this policy at the earliest possible stage are strongly encouraged to raise their concerns with an eligible recipient, their manager, senior manager, nominated Contact Officer or any member of the human resources department, [HRsupport@lpgroup.com.au](mailto:HRsupport@lpgroup.com.au).

If there is a concern with reporting to any of the listed eligible recipients, for example he or she reasonably believes that the Eligible Recipient is involved in the Improper Conduct, the employee should contact LPG's Disclosure Coordinator. LPG's Disclosure Coordinator can be contacted on the following details: Telephone: +61 3 9448 0646 or +61 428 942 637, Email: [faircall@lpgroup.com.au](mailto:faircall@lpgroup.com.au).

All concerns raised are assessed to determine how they should be investigated. Where remedy is necessary, this may be provided by LPG directly, or in collaboration with third parties. We provide several mechanisms for concerns and complaints to be raised confidentially and/or anonymously. More information can be found in our whistle-blower policy.

## 7. Protection

LPG is committed to the protection of any LPG employee, contractor, and consultant who makes a report in good faith under this Policy where they suspect that bribery and corruption may have occurred. Where a report of bribery and corruption is made in good faith, LPG will take all reasonable steps to ensure that the person making the report will not be personally disadvantaged or suffer any detriment.

## 8. Review of this Policy

This Policy will be reviewed at least every 2 years by the Audit Committee in consultation with the Chief Executive.

### 9. Approval

This Policy and Procedure was reviewed by the Audit Committee and approved by the Board on 20<sup>th</sup> May 2021.

### 10. Availability of the Policy and Related Documents

This Policy will be made available on the LPG Intranet and website and a written copy will be available on request.

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#### Related Documents

HRPP0005	EQUAL EMPLOYMENT, BULLYING, HARASSMENT & DISCRIMINATION POLICY
HRPP0152	WORKPLACE GRIEVANCE & COMPLAINTS HANDLING
CGPP0004	WHISTLEBLOWER POLICY