

**Credit Intelligence Limited**  
**(ACN 126 296 295)**  
**(“COMPANY”)**

**ANTI-BRIBERY AND CORRUPTION POLICY**

The purpose of the anti-bribery and corruption policy is to establish controls to ensure compliance by the Company and its controlled subsidiaries and controlled joint ventures with all applicable anti-bribery and corruption laws and to ensure that the Company conduct its business within the scope of the Company’s core values and commitments with honesty and integrity and in a socially responsible manner.

The Company have a “zero tolerance” approach to acts of bribery and corruption by any of our officers, employees and contractors and consultants. As well as being morally wrong and harmful to the reputations of the Company, bribery and corruption are criminal offences that expose the Company and the individuals to the risk of prosecution, fines and imprisonment.

This policy sets out the requirements of the Company regarding the management of gifts and benefits. Officers, employees, contractors and consultants of the Company must not give or accept gifts and benefits that will compromise, or appear to compromise, their integrity and objectivity in performing their duties, or cause, or appear to cause a conflict of interest.

This Policy applies globally. Officers, employees, contractors and consultants of the Company are advised that the Australian *Criminal Code Act 1995* (Cth) (**Code**), the US Foreign Corrupt Practices Act and the UK Bribery Act have extra-territorial reach. As such, for example, an Australian citizen may be prosecuted under the Code for a violation of the Code that occurs outside of Australia.

Any breach of this Policy may result in disciplinary action, including termination of employment or contract. If the matter involves a breach of law or other regulation, the matter may also be referred to an appropriate law enforcement authority.

This Policy should be read together with the Whistleblower Policy.

The Company has adopted recommendations provided in the ASX Corporate Governance Principles and, in particular, the recommendations regarding anti-bribery and corruption.

**What is Bribery and Corruption**

*Bribery*

Bribery is the offering, promising, giving, accepting or soliciting of an advantage as an inducement for action which is illegal, unethical or a breach of trust. A bribe is an inducement or rewards offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage and can take the form of gifts, donations, loans, fees, rewards or other advantages.

*Corruption*

Corruption is the abuse of entrusted power for private gain.

## **Policy**

### **A) Bribery and Corruption**

Officers, employees, contractors and consultants of the Company are not permitted to give, offer, promise, accept, request or authorise a bribe or engage in any form of corruption, whether directly, or indirectly. BY way of example, an employee will be in breach of this Policy if their family member or business associate accepts a benefit that is offered with the intention of influencing the employee.

### **B) Gifts and Hospitality**

Gift and genuine hospitality and entertainment expenditure that is reasonable and proportionate is allowable provided it does not place the recipient under any obligation or create any expectation that the giver will receive any special benefit or favour.

Officers, employees, contractors and consultants of the Company must declare and report gifts and/or benefits, either offered or accepted and valued at \$500 or more, in the Company's gifts and entertainment register within 5 working days of receiving or being offered the gift or benefit to safeguard and make transparent their relationships and dealings with individuals, organisations and client groups. Gifts should not be accepted on a recurring basis or broken down into parts of less than \$500.

If it is known in advance, the receipt of the gift or benefit should be discussed with the relevant CEO or the Secretary prior to acceptance.

The CEO and the Secretary (as applicable) must within 5 business days of being notified of an offer or receipt of a gift or benefit in accordance with this Policy provide the recipient of the offer, gift or benefit with notice of any action that should be taken by that person in relation to the gift or benefit. Such actions may include declining, donating or returning the gift or benefit.

### **C) Secret Commissions**

Secret commissions or payments occur where a commission from a third party (acting in a fiduciary capacity) is taken or solicited without disclosing that commission to that third party's principal. The secret commission is given as an inducement to that third person to use their position to influence the conduct of their principal's business. Secret commissions are a form of bribery and are prohibited under this Policy.

### **D) Facilitation Payments**

Facilitation payments are minor unofficial payments made to public officials to expedite or secure the performance of routine government action (for example issuing permits or licences). Facilitation payments are a form of bribery and are prohibited under this Policy.

### **E) Dealings with politicians and government officials**

All dealings with politicians and government officials which relate to the Company and its business activities must be conducted at arm's length and with the utmost professionalism, to avoid any perception of attempts to gain advantage or to improperly influence the outcome of an official decision.

### **F) Political Contributions**

The Company prohibit their respective officers, employees, contractors and consultants from making political contributions on behalf of the Company, other than with the prior written approval of the CEO of the Company.

### **G) Charitable Contributions**

The Company is committed to the communities in which they do business and encourage and support officers, employees, contractors and consultants participating in local community development initiatives, making donations and undertaking volunteer work.

This Policy does not seek to curtail an individual's freedom to make donations or undertake volunteer work in their personal capacity.

#### **H) Compliance with Local Laws**

If an officer, employee, contractor or consultant of the Company travels outside of Australia, that person must comply with local laws, codes of conduct, or other regulations in that jurisdiction relevant to bribery and corruption, even if those local laws are more restrictive than this Policy.

#### **Responsibilities**

All officers, employees, contractors and consultants of the Company must:

- ensure they read, understand and comply with this Policy;
- avoid any activity that might lead to, or suggest a breach of this Policy; and
- notify the CEO or the Secretary as soon as possible if they believe or suspect that a conflict with, or breach of, this Policy has occurred, or may occur in the future. Notifications may also be made pursuant to the Company's Whistleblower Policy.

#### **Board Review**

The Board will review this Policy annually to check that it is operating effectively and whether any changes are required to this Policy. This Policy may be amended by resolution of the Board.