

**RICHARD FADER PTY LTD (trading as)
AUSTRALIAN SHIPPING SUPPLIES
TASMANIAN SHIPPING SUPPLIES
PURDON & FEATHERSTONE**

POLICY: 007

ANTI BRIBERY AND CORRUPTION POLICY

Scope

This Anti Bribery and Corruption Policy is applicable to all Richard Fader Pty Ltd operations.

Commitment

Richard Fader Pty Ltd is committed to conducting its business ethically and in compliance with all applicable Australian laws and regulations and similar laws in other countries that prohibit improper payments to obtain a business advantage.

This document describes the Richard Fader Pty Ltd Policy prohibiting bribery and other improper payments in the conduct of company business operations and employee responsibilities for ensuring implementation of the Policy.

Questions about the Policy or its applicability to specific circumstances should be referred to the Managing Director.

Policy

Richard Fader Pty Ltd strictly prohibits bribery or other improper payments in any of its business operations. This prohibition applies to all business activities, anywhere in the world, whether involving government officials or other commercial enterprises.

A bribe or other improper payment to secure a business advantage is never acceptable and can expose individuals and Richard Fader Pty Ltd to possible criminal prosecution, reputational harm, or other serious consequences.

This Policy applies to everyone at Richard Fader Pty Ltd, including all officers, employees and agents or other intermediaries acting on behalf of Richard Fader Pty Ltd.

Each officer and employee of Richard Fader Pty Ltd has a personal responsibility and obligation to conduct the company business activities ethically and in compliance with all applicable laws based on the countries where the company does business. Failure to do so may result in disciplinary action, up to and including dismissal.

Improper payments prohibited by this policy include bribes, kickbacks, excessive gifts or entertainment, or any other payment made or offered to obtain an undue business advantage.

These payments should not be confused with reasonable and limited expenditures on gifts, business entertainment and other legitimate activities directly related to the business conduct of Richard Fader Pty Ltd.



Richard Fader
Managing Director

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