



# Anti Bribery and Corruption Policy

**Atlas Arteria Limited  
Atlas Arteria International Limited**

# Anti Bribery and Corruption Policy

## Introduction

ALX is committed to operating within the laws of any jurisdiction in which it does business, and in a way that is consistent with our Code of Conduct.

ALX has implemented a robust framework to deter and prevent bribery and corruption. ALX's *Anti-Bribery and Corruption Policy* prohibits the actual or attempted use of any form of bribery or corruption, either directly or indirectly, on ALX's behalf to advance its business interests or those of its associates. The framework and Policy are designed to safeguard ALX's reputation, consumer, investor and business confidence.

## Identifying and preventing bribery and corruption

### Defining bribery and corruption

For the purposes of ALX's Policy, a "bribe" is anything of value given, offered, promised, accepted, requested or authorised (in each case, directly or indirectly) with the intent that a person who is trusted or expected to act in good faith or with impartiality, performs that function improperly or in order to obtain or retain an advantage in the course of business.

"Corruption" is the misuse of public office or power for private gain; or misuse of private power in relation to business outside the realm of government. Acts of bribery or corruption generally involve the undue influence of an individual in the performance of their duty, whether in the public or private sector.

### Prohibition on bribery and corruption

ALX staff are not permitted to give, offer, promise, accept, request or authorise a bribe, whether directly or indirectly.

### Facilitation payments

ALX also prohibits the use of facilitation payments (payments made directly to a government official or employee for their benefit, to expedite or secure the performance of governmental action by a government agency), whether directly or through third parties.

## Types of bribery and corruption

ALX's Policy identifies bribery and corruption risks in three key areas:

- Political and commercial corruption
- Dealing with and through third parties; and
- Gifts and Entertainment.

## Steps taken to prevent bribery and corruption

ALX has systems and controls in place to prevent bribery and corruption.

### Risk assessment

These include periodic risk assessments to identify and address bribery and corruption risk and controls tailored to manage the risks identified through this process.

### Policies and procedures

ALX maintains a Code of Conduct which includes a whistleblower framework which promotes the escalation and reporting of matters including bribery and corruption. Staff are encouraged to raise matters through line management or through other mechanisms outlined in the 'Speak Up' section of the Code of Conduct or anonymously through an externally hosted whistleblower reporting service.

### Due diligence

In dealing with third parties, the Policy requires sufficient due diligence to be undertaken to ensure that they are suitable to be associated with ALX, and that appropriate controls are implemented, designed to prevent and detect bribery and corruption. This is to ensure the third parties ALX engages will not bribe or perform a corrupt act on ALX's behalf or for which ALX may be responsible or otherwise liable.

Such third parties associated with ALX are in turn expected to have appropriate due diligence arrangements and controls in place in relation to the other parties they engage with for and on behalf of ALX, to ensure that controls are implemented to prevent, detect, mitigate and manage any potential bribery & corruption risks in respect of the services provided.

### Monitoring and review

ALX performs payment monitoring, including monitoring for bribery 'red flags' and ALX's compliance function conducts periodic risk-based monitoring of gifts and entertainment.

### Training and communication

ALX promotes staff awareness of, and compliance with the Anti-Bribery & Corruption framework through the appropriate dissemination of the Policy and procedures (including disciplinary procedures) and training for relevant staff.

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## Disclaimer and limitation

This document is a summary of ALX's Anti-Bribery and Corruption Policy and framework. It is not intended to create third party rights or duties or to form part of any contractual agreement between ALX and any other party.