

ANTI-BRIBERY AND CORRUPTION POLICY

1.SCOPE AND PURPOSE OF POLICY

1.1. SCOPE

Enviropacific has implemented this Anti-Bribery and Corruption Policy (Policy) to:

- (a) assist its employees, directors, contractors, consultants and other persons that act on behalf of Enviropacific and its associates to understand and comply with anti-bribery and corruption laws; and
- (b) guide its employees and other persons to whom this Policy applies on how to act if they wish to give or receive gifts or benefits.

This Policy should be read together with Enviropacific's Whistleblower Policy and the Code of Conduct.

1.2. APPLICATION

This Policy applies to the directors, employees, contractors, consultants and other persons that act on behalf of Enviropacific and its associates (each an Applicable Person).

This Policy applies globally. Certain anti-bribery and corruption laws, such as the Australian Criminal Code, the US Foreign Corrupt Practices Act and the UK Bribery Act, apply both within and outside the countries in which they were enacted. This means, for example, that an employee may be prosecuted under the Australian Criminal Code Act 1995 (Cth) (Code) even if they breach the Code outside of Australia.

1.3. FURTHER ADVICE

If anyone does not understand any aspect of this Policy, please contact the Company Secretary.

2.WHAT IS BRIBERY AND CORRUPTION

2.1. 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 reward 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.

2.2. CORRUPTION

Corruption is the abuse of entrusted power for private gain.

3.POLICY

3.1. BRIBERY AND CORRUPTION

An Applicable Person must not 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 his/her family member or business associate accepts a benefit that is offered with the intention of influencing the employee.

3.2. GIFTS AND HOSPITALITY

An Applicable Person must not give or accept gifts and benefits that:

- (a) compromise, or appear to compromise, their integrity and objectivity in performing their duties; or
- (b) cause, or appear to cause, a conflict of interest.

Applicable Persons may give or accept gifts and genuine hospitality and entertainment expenditure if they are reasonable, proportionate and do not oblige the recipient to arrange some special benefit or favour for the giver in return.

If an Applicable Person offers or receives gifts and/or benefits valued at \$250 or more, they must record these in the Gift and Entertainment Register promptly after receiving or being offered the gift or benefit. The Gifts and Entertainment Register will be maintained by Enviropacific's Human Resources Manager.

Gifts should not be accepted on a re-occurring basis or broken down into parts of less than \$250.

If employees or other persons to whom this Policy applies know that they will receive a gift or benefit in the future, they should discuss it with the CEO or the Company Secretary prior to acceptance. The CEO and the Company Secretary (as applicable) can then advise on whether any action 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.

3.3. SECRET COMMISSIONS

Secret commissions or payments occur where a commission from a third party 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.

3.4. 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.

3.5. DEALINGS WITH POLITICIANS AND GOVERNMENT OFFICIALS

All dealings with politicians and government officials which relate to Enviropacific 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.

An Applicable Person must not make any donation or other financial contribution to any political party or candidate for an election or sponsor any organisations (other than in a purely personal capacity) without seeking and obtaining prior approval from the CEO or Secretary.

3.6. CHARITABLE CONTRIBUTIONS

This Policy does not restrict an Applicable Person from making donations or undertaking volunteer work in their personal capacity.

3.7. COMPLIANCE WITH LOCAL LAWS

If an Applicable Person 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.

4. CONSEQUENCES OF BREACHING THIS POLICY

Enviropacific has a "zero tolerance" approach to bribery and corruption. As well as being morally wrong and harmful to Enviropacific's reputation, bribery and corruption are criminal offences that expose the Enviropacific and individuals to the risk of prosecution, fines and imprisonment.

If an Applicable Person breaches this Policy, they may be subject to disciplinary action, including termination of employment.

If the matter involves a breach of law or other regulation, Enviropacific may refer the matter to an appropriate law enforcement authority.

5.RESPONSIBILITIES

An Applicable Person must:

- (a) ensure that they read, understand and comply with this Policy (including the reporting requirements in this Policy, such as reporting certain gifts);
- (b) avoid any activity that might lead to, or suggest a breach of, this Policy; and
- (c) notify the CEO or the Company Secretary as soon as possible if they believe or suspect any breaches, conflicts or suspicious activity which may be dealt with in this Policy. Notifications may also be made pursuant to Enviropacific's Whistleblower Policy.

6.RESPONSIBILITY FOR POLICY COMPLIANCE, TRAINING AND REVIEW

The Company Secretary is responsible for the overall administration of this Policy and must periodically monitor the implementation of this Policy and review on an ongoing basis the Policy's suitability and effectiveness. Internal control systems and procedures, such as the proper maintenance of the Gifts and Entertainment Register, are to be audited periodically to ensure that they are effective in minimising the risk of non-compliance with this Policy.

The Company Secretary must notify the Board of any material breach of this Policy.

Training on how to comply with this Policy will be provided by Enviropacific.

7.REVIEW AND PUBLICATION OF THIS POLICY

The Board will review this Policy annually or as otherwise required 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.

Approved by the Board on 24 February 2020.