



Q1 is committed to maintaining a high standard of integrity, reputational excellence and good corporate governance in all its interactions with its clients, suppliers and any regulatory bodies it works with.

Our Anti-Bribery Policy is a critical component of Q1's delivery on its strategic goal to ensure enduring trust, integrity and resilience and outlines our requirements regarding the management of gifts and benefits.

Our goal is to ensure maximum openness, trustworthiness and to ensure we lead the sector in responsible, honest operation in how we do business.

The policy applies globally. If our teams travel outside Australia, they are subject to the laws of the country they are in; however the principles of this policy must be followed regardless of whether that country has specific bribery and corruption laws. Where a country has specific bribery and corruption laws which are lesser standard to this policy, then this policy prevails.

Q1 GROUP ANTI-BRIBERY POLICY

Revision B February 2020

Q1 GROUP
BE BOLD IN OUR KNOWLEDGE
CODE OF CONDUCT

WHAT IS BRIBERY?

- Generally, bribery means the act of offering, providing or causing the offering or provision of a benefit that is not legitimately due, to a person acting in an official or representative capacity for the purpose of obtaining or retaining business or a commercial advantage.

A bribe may include the following:

- A direct or indirect promise, offering of or authorisation of anything of value.
- An offer of a kickback, loan, fee, reward or other advantage.
- The payment of any travel or travel-related expenses to a government official or business partner.
- Gifts, entertainment or charitable contributions to a business partner on behalf of or that could benefit a government official or his or her relative.
- Payment of fees to a government official who provides services as a speaker, consultant or advisor.
- Payment to a government official or employee, or other intermediary to facilitate or accelerate the performance of a routine non-discretionary government action.
- Payment of secret or undisclosed commissions or other gift or consideration; or facilitation payments.
- **Bribes are designed to exert influence or obtain an unfair advantage. Acts of bribery are designed to improperly influence individuals to act dishonestly in the performance or discharge of their duty or in the use of their position.**

BRIBERY LAWS & ENFORCEMENT

- **Bribery is a criminal offence and penalties can be severe for both Q1 and individual employees. Acts of bribery may result in prosecution at home or in other jurisdictions.**

Most countries have laws prohibiting the making of offers, payments or gift giving which are designed to exert improper influence on the beneficiary. In Australia, the Criminal Code Act criminalises the bribery of Commonwealth public officials. Bribery is also prohibited in each Australian state and territory. In New Zealand, the Crimes Act, the Crimes (Bribery of Foreign Public Officials) Amendment Act, and the Secret Commissions Act regulate the law around bribery. There is also legislation in many countries, including the United States (the Foreign Corrupt Practices Act and Anti-Kickback Statute), Ireland (the Criminal Justice (Corruption Offences) Act 2018) and the United Kingdom (the Bribery Act) that prohibits bribery.

An Employee who offers or accepts a bribe is in breach of this Anti-Bribery Policy. A breach of applicable law and/or this Anti-Bribery Policy will be regarded by Q1 as serious misconduct which may lead to disciplinary action, including termination. Q1 may report any serious misconduct to relevant authorities, including law enforcement authorities.

ANTI-BRIBERY POLICY

Q1 strives to be a strong competitor in any market it serves and is committed to doing so without the use of bribery or unfair business practices. This Policy has been developed in alignment with in line with our values to ensure that we observe the highest standards of fair dealing, honesty and integrity in our business activities.

This policy applies to all current and future director/s, senior managers, the entire back office and all contractors and consultants working for Q1. It applies to the both Q1 Professional Services and Q1 Recruitment personnel.

GIFTS, ENTERTAINMENT & HOSPITALITY

- A bribe does not include seasonal low value gifts, entertainment or hospitality that are transparent, culturally appropriate and incapable of being considered an inducement to act dishonestly or in breach of any duty. A gift or hospitality should not be extravagant so as to induce or imply an inducement or intention to influence a business decision. It may not be a defence to a claim that a 'gift' was of a customary nature, so care should always be taken regardless of value.

As part of their employment, Employees may be offered a gift from a client, a supplier or someone outside of Q1. Employees may also wish to give a gift to a client, supplier or third party. The following list provides Employees with details about what is and isn't acceptable in relation to the giving and receiving of gifts: .

- A gift is any item of value, and includes offers of travel, hospitality, entertainment, dinners, theatre, sporting events, gift cards or gift baskets. It is only acceptable for Q1 personnel to offer food or drink or any other gift up to a maximum of \$50 without reference to senior management. If above \$50 then the senior leadership of Q1 needs to be consulted.
- Never give or receive cash payments as a gift. This includes gift cards. (Gift cards are acceptable to give, (but not receive) in relation to a referral fee where a person recommends a candidate who becomes successful in gaining a full time, permanent or statement of work for one of Q1's clients up to the value of \$500, this is part of company policy to ensure we get the best personnel to support our clients requirements).
- Generally, don't give or accept travel as a gift.
- You can accept gifts in some circumstances. Consider what is reasonable. Think about the value, the frequency and the circumstances in which they are offered. Always consult your General Manager or Director for any gift decisions. An example of an acceptable gift is a small gift given as a token of thanks for your contribution and assistance. What's the line here? Consider whether the giving or receiving of the gift is intended to, or may look like, it influenced a business decision or created an obligation to the giver. If so, don't accept it! If a gift is under \$50 then it is ok to accept. Q1 personnel are not allowed to accept gifts over \$50.

- Our clients will have their own anti-bribery policies. Our people should check with the individual personnel and clients and ensure we never help these people and businesses contravene their own policies.

- For example, a client may have a policy that they cannot accept any form of hospitality even in the form of a coffee paid for by Q1. If this is the case, then it is not acceptable to pressure the client to accept the gift/offer of hospitality in any way, at any time.

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DONATIONS

- The Director/s of Q1 Professional Services Pty Ltd and Q1 Recruitment Pty Ltd has sole authority to make political donations. This has never yet been exercised as no political donations have yet been made. No employee is authorised to make political donations on behalf of either Q1 entity.
- All charitable donations and sponsorships must be made in accordance with local laws and the delegations of authority.

HOW TO RAISE A CONCERN

- The Q1 Group encourages open communication and relies on its Employees to help maintain and grow its culture of honest and ethical behaviour.
 - All employees are responsible for adhering to this policy and to help, prevent and report instances of bribery and other suspicious activities and expects Employees who become aware of known, suspected or potential causes of bribery or other suspicious activities to report such instances.
 - Where an employee suspects an instance of bribery or any other suspicious activity, the matter should be reported to the reporting line. If the concern is about any level of senior management, then this should be reported directly to the Managing Director.
 - If you require further information, assistance, or are uncertain about the application of this policy or the law, please refer to your line manager in the first instance.
- Review of this Policy
 - This policy will be reviewed every two years. The policy may be amended by Director level only.
 - Last update to this policy was 2nd February 2020.

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