

BRIBERY & CORRUPTION POLICY

Fleurieu Cranes Pty Ltd has a zero-tolerance towards bribery and corruption and is committed to applying this principle throughout all of our business [whether potential or existing] undertakings. Fleurieu Cranes expects all workers to abide by this and all company policies.

“Bribery” is the act of offering something to gain an unfair advantage and “corruption” is an abuse of power or trust, to gain an unfair advantage.

Fleurieu Cranes believes that building strong industry/business relationships is important. Gifts received or given, with the pure intent of strengthening new or existing business relations are deemed as appropriate. It is however required that all workers must assess the intentions and integrity behind any gift as to whether it is appropriate. The following definitions provide guidance to assist workers in that assessment.

Unacceptable:

- Giving, receiving or facilitating [direct or indirectly] any payment or gift of value with the express intention of business or commercial gain (*eg. tenders, contracts*), or
- Failure to report improper use or mishandling of funds or assets, or
- Initiating or facilitating any activities pertaining to bribery or corruption.

Acceptable:

- Any gift below the value of \$150, or
- A gift which is not exchanged in return for unfair advantage and has been approved by senior management.

All Fleurieu Cranes personnel have a responsibility to perform their duties with integrity, ensuring best practice in business relations.

Philip Allen

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MANAGING DIRECTOR



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SIGNATURE

16 March 2018

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DATE