


WIS FINANCE	APPROVED BY/ISSUED DATE Chief Financial Officer November 2017	 Wesfarmers Industrial and Safety POLICIES & PROCEDURES
PAGE 1 of 3	REVISED BY/REVISION DATE Owner: GM Finance WIS Revised: April 2020	
ANTI-BRIBERY POLICY		

Wesfarmers Industrial & Safety (**WIS**) is committed to complying with the laws and regulations in the jurisdictions in which its businesses operate and acting in an ethical manner consistent with the principles of honesty, integrity, fairness and respect.

The Wesfarmers Anti-bribery Policy (**Policy**) applies across the Wesfarmers Group and extends to all WIS employees and personnel.

The Policy can be found [here](#).

The Policy:

- prohibits bribes from being offered, given or accepted, along with facilitation payments, secret commissions and other prohibited payments, including money laundering;
- prohibits making, accepting or requesting an irregular payment or other thing of value to win business or influence a business decision in favour of the Wesfarmers Group;
- introduces specific requirements for the giving and accepting of gifts, entertainment and hospitality and the making of political and charitable donations; and
- requires all employees and personnel to be vigilant and to report breaches of or any suspicious behaviour in relation to the Policy.

All WIS employees and personnel must understand and comply with the requirements of the Policy. It is therefore important that you read this document together with the Policy and talk to your manager if you have any questions.

Anti-bribery Officer

WIS has a designated Anti-bribery Officer who is responsible for monitoring and applying the Policy and the WIS Anti-bribery Policy. This position is currently held by the WIS Group Reporting Manager. All instances of suspected or actual bribery or improper conduct in breach of the Policy must be reported to the Anti-bribery Officer.

The Anti-bribery Officer:

- administers the Gifts, Entertainment and Hospitality Register for WIS (**Register**);
- provides pre-approval of:
 - gifts, entertainment and hospitality of any value offered to or accepted from public or government officials or their associates; and
 - charitable donations of any value made on behalf of WIS;
- actions instances of non-compliance or breach of the Policy by WIS employees and personnel;
- can advise whether particular payments, gifts, entertainment or hospitality might contravene the Policy; and
- otherwise provides guidance in relation to the Policy.

Political donations may only be made with the permission of the Wesfarmers Limited Board.

Gifts, Entertainment & Hospitality Register

Operations in Australia, New Zealand and the United Kingdom

The reporting threshold for WIS for accepting and offering gifts, entertainment or hospitality has been set at AUD \$200 for operations in Australia, New Zealand and the United Kingdom. You must immediately report to the Anti-bribery Officer any gift, entertainment or hospitality (whether received or offered to or by WIS) which exceeds the relevant threshold amount. If you are not sure whether a particular gift, entertainment or hospitality exceeds or might exceed the threshold amount, you should report it to the Anti-bribery Officer for advice.

Operations in other countries

Outside of Australia, New Zealand and the United Kingdom *any* gift, entertainment or hospitality *of any value* that is offered, accepted or received by WIS must be reported to the Anti-bribery Officer and recorded in the Register.

The Wesfarmers Policy refers to the kinds of gifts, entertainment and hospitality which might be prohibited. You must make sure you have satisfied yourself that the gift, entertainment or hospitality is appropriate before accepting or offering it. Refer to section 3 of Annexure A in the Policy, which is available [here](#).

Please note that in all countries in which WIS operates, the prior approval of the Anti-bribery Officer is required for:

- gifts, entertainment and hospitality of any value that is offered to or accepted from public or government officials or their associates; and
- charitable donations *of any value* made on behalf of WIS.

How do you report Gifts/Entertainment/Hospitality?

You are required to complete a Gift, Entertainment and Hospitality Registration Form (click [here](#) for copy) with details of any gifts, entertainment or hospitality offered, received or accepted:

- in excess of the relevant threshold amount of AUD \$200 for operations in Australia, New Zealand and the United Kingdom; and
- *of any value* for operations outside of Australia, New Zealand or the United Kingdom,

and email the completed form to antibribery@wisau.com.au.

The Register is an additional reporting requirement and all expenditure by WIS employees and personnel, including on gifts, entertainment or hospitality (regardless of the amount), must be approved in accordance with the WIS Delegated Authority Policy.

Donations and Sponsorship

Pursuant to the Policy, charitable donations and sponsorship may only be offered or made in accordance with the Donations and Sponsorships Policy (available [here](#)), and with the prior approval of the Anti-bribery Officer. The details of the proposed donation or sponsorship, including the amount are to be emailed to antibribery@wisau.com.au. You should allow up to five (5) business days for the Anti-bribery Officer to review and consider the request.

Consequences of breaching the Policy

Bribery and the related improper conduct addressed by the Policy and this document are serious offences. If a WIS business is found to have taken part in bribery or any other related improper conduct addressed by the Policy it could face a fine, be excluded from tendering for public contracts, and suffer reputational harm.

A breach of the Policy by WIS employees and personnel will be regarded as serious misconduct, leading to disciplinary action which may include termination of employment. Breach of the Policy may also expose an individual to criminal and civil liability and could result in imprisonment or the imposition of a significant financial penalty.