

# Policy:

## Anti-Bribery & Anti-Corruption




SM Automatic Doors is committed to conducting business in an ethical and honest manner, and to implementing and enforcing systems that ensure bribery & corruption is prevented. SM Doors has zero-tolerance for bribery and corrupt activities. We are committed to acting professionally, fairly, and with integrity in all business dealings and relationships, everywhere we operate.

SM Doors will constantly uphold all laws relating to anti-bribery and corruption in all the jurisdictions in which we operate. Our conduct is bound by the laws of Australia, at home and abroad, and we understand that laws in other countries can cumulatively apply to illegal acts outside of Australia.

SM Doors recognises that bribery and corruption are punishable by imprisonment, fines, exclusion from tendering for public contracts, and serious reputation damage. Corrupt activity of any single company affects industry as a whole.

### What we do to eliminate it

<b>Definition</b>	<p>Bribery refers to the act of offering, giving, promising, asking, agreeing, receiving, accepting, or soliciting something of value or of an advantage so to induce or influence an action or decision. Bribery is illegal.</p> <p>A bribe is made so as to gain commercial, contractual, regulatory, or personal advantage.</p> <p>Bribery includes both giving and receiving.</p> <p>Employees must not engage in any form of bribery, whether it be directly, passively (as described above), or through a third party (such as an agent or distributor). They must not bribe a public official anywhere in the world. They must not accept bribes in any degree and if they are uncertain about whether something is a bribe or a gift or act of hospitality, they must seek further advice from the compliance manager.</p>
<b>Acceptable exchanges</b>	Refer to page 2 for detailed descriptions of exchanges that are acceptable & unacceptable for these circumstances: Gifts and hospitality; Facilitation payments; Political contributions; Charitable contributions
<b>Training</b>	SM Doors will provide training on this policy as part of the induction process for all new employees, and whenever employee knowledge of compliance with law needs to be enhanced (eg potential risk of facing bribery or corruption during work activities)
<b>Communication</b>	SM Doors' anti-bribery and corruption policy and zero-tolerance attitude will be clearly communicated to clients, suppliers, contractors, business partners, and any third-parties at the outset of business relations, and as appropriate thereafter.
<b>Monitoring</b>	<p>SM Doors' compliance manager is responsible for monitoring the effectiveness of this policy and will review the implementation of it on a regular basis. They will assess its suitability, adequacy, &amp; effectiveness.</p> <p>Internal control systems and procedures designed to prevent bribery and corruption are subject to regular audits to ensure that they are effective in practice.</p> <p>Any need for improvements will be applied as soon as possible. Employees are encouraged to offer their feedback to the compliance manager on this policy if they have any suggestions for how it may be improved.</p>
<b>Reporting</b>	<p>Employees are encouraged to raise concerns about corrupt activity as early as possible. If you're uncertain about whether a certain action or behaviour can be considered bribery or corruption, you should speak to your line manager, the compliance manager, the director, or the General Manager.</p> <p>SM Doors will familiarise all employees with its whistleblowing procedures so employees can report their concerns swiftly and confidentially.</p> <p>Employees must to the compliance manager as soon as possible if offered a bribe by anyone, if asked to make one, if you suspect that you may be bribed or asked to make a bribe in the near future, or if you have reason to believe that you are a victim of another corrupt activity.</p>
<b>Protection</b>	<p>If you refuse to accept or offer a bribe or you report a concern relating to potential act(s) of bribery or corruption, SM Doors understands that you may feel worried about potential repercussions. SM Doors will support anyone who raises concerns in good faith under this policy, even if investigation finds that they were mistaken.</p> <p>SM Doors will ensure that no one suffers any detrimental treatment as a result of refusing to accept or offer a bribe or other corrupt activities or because they reported a concern relating to potential act(s) of bribery or corruption. Detrimental treatment refers to dismissal, disciplinary action, threats, or unfavourable treatment in relation to the concern the individual raised.</p> <p>If you have reason to believe you've been subjected to unjust treatment as a result of a concern or refusal to accept a bribe, you should inform your line manager or the compliance manager immediately.</p>
<b>Discipline</b>	Bribery & corruption are potentially criminal acts, and will be dealt with according to the relevant laws.

<p><b>Accountability.</b> I commit SM Automatic Doors to the implementation of this policy and to provide the resources necessary to achieve it. We will not knowingly participate in bribery or corruption.</p>	<p><b>Signed:</b> Jeremy Michaelson Director SM Automatic Doors Pty Ltd Dated: <u>14<sup>th</sup> April 2021</u> Next Review: <u>on or before 14<sup>th</sup> April 2022</u></p> 
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### Acceptable & unacceptable exchanges



#### Gifts & Hospitality

SM Doors accepts normal and appropriate gestures of hospitality and goodwill (whether given to/received from third parties), providing that the giving or receiving of gifts meets the following requirements:

It is NOT	made with the intention of influencing the party to whom it is being given, to obtain or reward the retention of a business or a business advantage, or as an explicit or implicit exchange for favours or benefits.
	made with the suggestion that a return favour is expected
	cash or a cash equivalent (e.g. a voucher or gift certificate).
	given/received secretly
	selectively given to a key, influential person, clearly with the intention of directly influencing them
	above a certain excessive value, as pre-determined by the company's compliance manager (usually in excess of A\$100).
It IS	offer to, or accepted from, a government official or representative or politician or political party, without the prior approval of the company's compliance manager
	compliant with local law
	given in the name of the company, not in an individual's name
	appropriate for the circumstances (e.g. giving small gifts around Christmas or as a small thank you to a company for helping with a large project upon completion).
	an appropriate type and value and given at an appropriate time, taking into account the reason for the gift
	given/received openly

Where it is inappropriate to decline the offer of a gift (i.e. when meeting with an individual of a certain religion/culture who may take offence), the gift may be accepted so long as it is declared to the compliance manager, who will assess the circumstances.

SM Doors recognises that the practice of giving and receiving business gifts varies between countries, regions, cultures, and religions, so definitions of what is acceptable and not acceptable will inevitably differ for each.

As good practice, gifts given and received should always be disclosed to the compliance manager. Gifts from suppliers should always be disclosed.

The intention behind a gift being given/received should always be considered. If there is any uncertainty, the advice of the compliance manager should be sought.

#### Facilitation Payments & Kickbacks

SM Doors does not accept and will not make any form of facilitation payments of any nature. We recognise that facilitation payments are a form of bribery that involves expediting or facilitating the performance of a public official for a routine governmental action. We recognise that they tend to be made by low level officials with the intention of securing or speeding up the performance of a certain duty or action.

SM Doors does not allow kickbacks to be made or accepted. Kickbacks are made in exchange for a business favour or advantage, and we regard that as unacceptable behaviour.

SM Doors recognises that, despite our strict policy on facilitation payments and kickbacks, employees may face a situation where avoiding a facilitation payment or kickback may put their/their family's personal security at risk. Under these circumstances, the following steps must be taken:

1. Keep any amount to the minimum.
2. Ask for a receipt, detailing the amount and reason for the payment.
3. Create a record concerning the payment.
4. Report the incident to your line manager.

#### Political Contributions

SM Doors will not make donations in cash, kind, or by any other means, to support any political parties or candidates. We recognise that such donations may be perceived as an attempt to gain an improper business advantage.

#### Charitable Contributions

SM Doors accepts (and indeed encourages) the act of donating to charities – whether through services, knowledge, time, or direct financial contributions (cash or otherwise) – and agrees to disclose all charitable contributions it makes. Employees must be careful to ensure that charitable contributions are not used to facilitate and conceal acts of bribery. We will ensure that all charitable donations made are legal and ethical under local laws and practices, and that donations are not offered/made without the approval of the compliance manager.