



GIS-Pax Pty Ltd

Anti-Bribery & Corruption Policy

Version 1.2

Effective date: 15 June 2026

Document information

Document	ABC Policy
Owner	Commercial Manager, GIS-Pax Pty Ltd
Effective date	15 June 2026
Version	1.2
Applies to	Employees, officers, directors, contractors, consultants, agents, and representatives (together, "Personnel").
Contact	security@gis-pax.com

Version	Date	Author	Revision details
0.1	16 July 2025	GIS-Pax	First draft created
1.1	24 July 2025	GIS-Pax	Final approved (internal)
1.2	15 June 2026	GIS-Pax	First public published version.

Purpose

This document defines the Anti-Bribery and Corruption (ABC) policy adopted and implemented at GIS-Pax which includes its approach to identifying, managing, and mitigating bribery and corruption risk and complying with all relevant legislation, within Australia and abroad.

Scope

This Policy applies to all employees, officers, directors, contractors, consultants, agents, and representatives (together, "Personnel") acting on behalf of GIS-Pax, regardless of their location.

Policy Requirements

General Obligations

GIS-Pax and its Personnel collectively commit to act professionally, fairly and with integrity at all times. All Personnel are expected to comply with the applicable ABC laws and regulations that apply within their jurisdiction.

All Personnel are prohibited from engaging in any form of actual or perceived [Bribery](#) or [Corruption](#).

All Personnel should:

- Understand and comply with this policy and any related guidance;
- Familiarise and comply with all applicable anti-bribery and corruption laws
- Promptly report any suspected or actual incidents or Bribery or Corruption; and
- Promptly report any requests for Bribes, including Facilitation Payments.

Bribery

Bribery includes offering, giving, receiving, or soliciting anything of value ("Benefit") to improperly influence the actions or decisions of another person, including government officials, business partners, or other third parties.

Examples of Benefits that could constitute a bribe:

- Cash or cash-equivalents

- [Gifts or hospitality](#)
- Travel or accommodation
- Job offers or consulting contracts
- Charitable or [political contributions](#) with an improper intent

Corruption

Corruption involves the misuse of a position of trust, power, or influence for personal or business gain. This includes both direct actions, such as providing an unfair advantage to a client or partner, and indirect actions, such as encouraging a third party to act improperly on your behalf. Corruption can occur even without the exchange of money or tangible benefits and often takes more subtle forms than bribery.

Examples of conduct that could constitute corruption:

- Favouring a supplier or agent due to a personal relationship
- Misusing confidential company information for personal advantage
- Steering opportunities toward a third party in return for future benefit
- Influencing procurement decisions for non-business reasons
- Using your role at GIS-Pax to secure external business or employment opportunities

Managing Anti-Bribery and Corruption Risk

To combat Bribery and Corruption, GIS-Pax is responsible for implementing robust measures and adequate procedures appropriate to the size and nature of its business, including the products and services.

Facilitation Payments

GIS-Pax prohibits facilitation payments, which are unofficial payments made to public officials to expedite routine government services or decisions. This applies globally, including in jurisdictions where such payments are seen as customary.

Gifts and Hospitality

GIS-Pax recognises that modest gifts and hospitality may be appropriate in some business contexts. However, offering or accepting gifts or hospitality that could improperly influence or appear to influence business decisions is strictly prohibited.

Monetary Thresholds

Gifts or hospitality valued above AUD \$150 (or local currency equivalent) offered or accepted by Personnel must be declared to the Commercial Manager prior to the offer or acceptance being made.

Gifts or hospitality above AUD \$300 are considered excessive and must not be offered or accepted, unless explicitly approved in writing by the Board of Directors.

General Rules

Gifts or hospitality must be infrequent, culturally appropriate, and proportionate to the business relationship.

Any offer involving a [public official](#) must be treated with additional caution and must be pre-approved, regardless of value.

Cash or cash-equivalent gifts (e.g. gift cards, vouchers) must never be offered or accepted.

Examples of Acceptable Scenarios

- Personnel take a client or potential client out for a modest lunch.
- Personnel offer merchandise with the Company logo at event or meeting.

Examples of Unacceptable Scenarios

- Personnel offer sporting tickets to a client in the midst of a contract negotiation.
- Personnel accept expensive event hospitality to provide client with a discount.

Political Contributions

GIS-Pax does not make political contributions of any kind. Personnel must not:

- Use company funds, resource or time to support political candidates or parties
- Make political donations on behalf of GIS-Pax
- Claim personal political donations as a company expense

Reporting Bribery and Corruption

Personnel must immediately report any actual, suspected, or attempted bribery or corruption to the Commercial Manager or Managing Director. GIS-Pax supports a culture of speaking up and will treat all reports confidentially and without retaliation.

Reports may also be made anonymously. Anyone who raises a concern in good faith will be protected from victimisation or disciplinary action.

Breach of Policy

A breach of this policy may result in disciplinary action, including but not limited to formal warnings, dismissal, termination of contract, and/or referral to law enforcement or regulatory authorities.

Under Australian law, specifically the Criminal Code Act 1995 (Cth), serious penalties apply for bribery of both domestic and foreign public officials. These include:

- For individuals: up to 10 years' imprisonment, fines of up to 10,000 penalty units, or both;
- For corporations: the greater of
 - 100,000 penalty units (equivalent to over AUD \$30 million at current rates),
 - Three times the value of the benefit obtained, or
 - 10% of the company's annual turnover if the benefit cannot be calculated.

Roles and Responsibilities

Role	Responsibility
All Personnel	• Read, understand, and comply with this Policy and applicable anti-bribery and corruption laws. • Avoid engaging in or facilitating any conduct that may be considered bribery or corruption. • Always act honestly and in the best interests of GIS-Pax. • Promptly report any suspected or actual incidents of bribery, corruption, or conflicts of interest. • Seek clarification from the Commercial Manager if unsure whether conduct may breach this Policy.
Managers and Team Leads	• Promote a culture of integrity and compliance within their teams. • Monitor for conduct or practices that may indicate a risk of bribery or corruption. • Support Personnel in identifying and addressing potential ethical concerns. • Escalate any concerns raised to the Commercial Manager or Managing Director without delay.
Commercial Manager	• Own and maintain this Policy. • Provide guidance to staff on interpreting and applying this Policy. • Review and investigate reports of suspected bribery or corruption. • Ensure third-party engagements include appropriate ABC terms and controls. • Recommend improvements to internal controls and risk mitigation measures.
Chief Executive Officer	• Ultimately accountable for ensuring GIS-Pax meets its legal obligations under applicable anti-bribery and corruption laws. • Review and approve any high-risk or exceptional transactions, including gifts or hospitality exceeding established thresholds. • Oversee significant ABC breaches and determine appropriate disciplinary or remedial action, in consultation with legal or external advisors where required.

Definitions

Terminology	Definition
Bribery	Offering or accepting a Benefit to influence a person's conduct or decision
Corruption	Abuse of a position of trust, power, or influence for private or business gain
Benefit	Anything of value, including money, gifts, services, business opportunities, or favourable treatment
Facilitation Payment	An unofficial payment made to a public official to speed up a routine process
Gifts or Hospitality	Anything of value offered or received in a professional context, including meals, drinks, event tickets, accommodation, merchandise, travel, or entertainment, whether provided directly or indirectly
Public Official	Any person employed by or acting on behalf of a government, government agency, state-owned entity, or international organisation
Political Contribution	Any donation or form of support, financial or in-kind, made to a political party, candidate, campaign, or government agency