

GMS – Anti-Bribery and Corruption Policy



Incorporating Occupational Health and Safety
and Environmental and Social Responsibility Requirements

Version 1 | August 2020

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1 PURPOSE OF THE ANTI-BRIBERY AND CORRUPTION POLICY

The aims of this policy are as far as is reasonably practicable to:

- (a) recognise Grange's commitment to operating:
 - (i) with a high standard of integrity, honesty and good corporate governance;
 - (ii) without bribery (i.e. the act of directly or indirectly offering, promising, giving or accepting a benefit [including but not limited to facilitation payments, secret commissions, other prohibited payments, offering, giving or accepting improper gifts, donations, favours, entertainment, hospitality etc] with the intention of influencing a person who is otherwise expected to act in good faith or in an impartial manner, to do or omit to do anything in the performance of their role or function, in order to provide Grange advantage that is not legitimately due);
 - (iii) without corruption (i.e. the abuse of entrusted power for private gain and includes activities such as money laundering);
 - (iv) in compliance with the law;
 - (v) consistently with Grange's policies and procedures; and
 - (vi) ethically in accordance with applicable ethical principles
- (b) direct and guide employees and contractors regarding their mutual obligations to personally comply with, and assist, Grange's compliance with above commitments;
- (c) limit the risk of bribery and/or corruption occurring within Grange;
- (d) demonstrate Grange's commitment to only doing business with parties who fully comply with this policy or those who are taking verifiable steps towards compliance;
- (e) implement:
 - (i) appropriate plans, and processes to support and implement this policy;
 - (ii) monitoring, reviewing and verification of Grange's systems; and
 - (iii) corrective action where it is identified that Grange, employees, contractors and/or visitors to the workplace are not complying with their

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respective commitments and/or putting Grange, themselves and/or others at risk of non-compliance; and

- (f) operate with the law, industrial instruments and other Grange policies and procedures.

2 COVERAGE

- (a) This policy covers and applies to employees and directors:
 - (i) at the workplace (including any conduct of a personal nature not related to work);
 - (ii) in the performance of work for or in connection with Grange; and
 - (iii) occurring outside the workplace or working hours if the acts or omissions:
 - (A) are likely to cause serious damage to the relationship between Grange and employees, contractors and visitors to the workplace;
 - (B) are incompatible with employees, and contractors at the workplace's duty to Grange; or
 - (C) damage or are likely to damage Grange interests or reputation.

3 REQUIREMENTS

- (a) Persons covered by this policy are required to:
 - (i) comply with this policy as lawful and reasonable directions;
 - (ii) comply with any applicable law;
 - (iii) not directly or indirectly engage in or aid, abet or encourage behaviour in breach of this policy/ law; and
 - (iv) meet their duty of care obligations and be accountable for their own safety and the safety of others at the workplace.
 - (v) not offer, give or accept gifts, favours, entertainment or hospitality except where the following pre-conditions are met in advance of the

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behaviour occurring:

- (A) clearly for genuine and proper relationship building;
 - (B) cannot reasonably be construed as an attempt to improperly influence the performance of the role or function of the recipient (e.g. during a tender or other competitive process);
 - (C) complies with the local law of the jurisdiction in which the expenditure is made;
 - (D) given in an open and transparent manner;
 - (E) does not include cash, loans or cash equivalents (such as gift certificates or vouchers);
 - (F) does not involve a regulatory, government official or politician (including their associates or organisations)
 - (G) it has otherwise been approved in writing by Grange; and
 - (H) does not exceed any nominated threshold amount.
- (vi) comply with any reporting and approval processes for gifts, entertainment or hospitality;
- (vii) obtain required approvals for political contributions and charitable donations to the extent of the applicable authority;
- (viii) maintain accurate records of dealings with third parties;
- (ix) be vigilant and report any breaches of, or suspicious behaviour related to, this policy and
- (x) meet their duty of care obligations and be accountable for their own behaviour/ conduct and the safety of others at the workplace.
- (b) Managers/supervisors are required to:
- (i) promote this policy within their area of responsibility; and
 - (ii) take reasonable steps to ensure that any potential breaches of this policy are identified, taken seriously and acted upon appropriately.

4 RESPONSIBILITIES

- (a) Grange will conduct risk assessments to determine which parts of the business are most at risk from bribery and/or corruption so efforts can be focused on the areas that are most at risk.
- (b) Grange will, where reasonably practicable and as informed by a risk assessment, engage directly with other parties in respect of this policy in order to gain a contemporary and accurate understanding of the measures those parties having place to ensure that bribery and/or corruption is not occurring within Grange.
- (c) Grange will discontinue arrangements or not engage with contractors where it is reasonably apparent that such other parties have not taken reasonable steps to prevent or specifically prohibit bribery and/or corruption in their applicable business operations.

5 VARIATION

This policy may be reasonably varied, terminated or replaced by Grange in its sole discretion from time to time.

6 REFERENCE/ASSOCIATED DOCUMENTS

Document Number	Document Title or Information Source	Location

7 DOCUMENT CONTROL

Version	Date	Description	Author	Approved
V1	18-Aug-2020	Policy created	A Smith	