

Anti-bribery and Corruption Policy

FOS Capital Limited
ACN 637 156 275

Adopted by the Board on 29 April 2021

1 Introduction

FOS Capital Limited (**the Company**) is committed to conducting business with honesty and integrity. The Company does not tolerate any form of bribery and corruption and will treat potential instances of bribery and corrupt behaviour as a threat to the Company's reputation and integrity as a business.

In accordance with these commitments and to support a culture of compliance, the Company has developed and adopted this Anti Bribery and Corruption Policy (**Policy**)

2 Purpose

2.1 The purpose of the Policy is to:

- (a) set out the responsibilities of the Company and personnel in observing and upholding the prohibition on bribery and related improper conduct; and
- (b) provide information and guidance on how to recognise and deal with instances of bribery and corruption. .

3 Policy Application

3.1 This Policy applies to all the Company's directors, employees, contractors, consultants and secondees (collectively referred to as **Personnel** in this Policy)

4 Key Principles

4.1 Fraud

- (a) Fraud is dishonest activity that leads to obtaining a personal benefit through deception. It can be by an individual against the company, our customers or other external parties;
- (b) Fraud includes forgery, money laundering, irregular payments or commissions, misuse of company or customer information, theft or misappropriation of cash or stock, company credit card or asset misuse and falsifying accounting records

4.2 Bribery & Corruption

- (a) Bribery and corruption are serious offences and can include improper payments, benefits or gifts offered or given with the purpose of influencing a decision or outcome. The bribe or corrupt act may not always be of a large value. It could be a lunch or an invitation to a sporting event;
- (b) Personnel should never give or accept bribes to persuade someone to act in the Company's favour, their favour or for the benefit of a third party, including family or friends.

4.3 Facilitation Payments

- (a) Facilitation payments are low value payments to government officials designed to receive favourable treatment or speed up routine governmental actions;
- (b) Personnel must never make payments in cash or payments that are unofficial, improper, or irregular directly or indirectly to government or public officials in order to secure a permit or licence or accelerate any other decision from a government agency.
- (c) Personnel are permitted to utilise legitimate methods to fast-track governmental actions.

5 Reporting Breaches

- 5.1 The Company's Personnel must report any breaches of, or suspicious conduct in relation to, this Policy.
- 5.2 This includes behaviour that makes the Company's Personnel and others engaged in activities for the Company feel threatened or under pressure to engage in improper conduct. Reports should be made to:
- (a) the Company Secretary; or
 - (b) in accordance with the Company's Whistleblower Policy.

6 Breach of Policy

- 6.1 Compliance with this Policy is mandatory.
- 6.2 All Personnel are expected to emphasize and explain these requirements as a condition to continued dealings with any third parties.
- 6.3 Any breach of the Policy will result in disciplinary action, may lead to termination or criminal persecution and may have serious consequences for all involved parties.
- 6.4 Each director must keep their personal or external business dealings separate from the Company's business dealings.
- 6.5 A director must only use goods, services and facilities received from the Company in accordance with the terms on which they are given.
- 6.6 A director must not accept any improper gift from the Company's existing or potential customers or suppliers.

7 Approved and adopted

- 7.1 This Policy was approved and adopted by the Board on 29 April 2021