

Title: Anti-Bribery and Corruption Policy

Number: PP-Ignite-HR-0025

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Approved By:	Board	Cross Ref No:	PP-Ignite-HR-0001 Code of Conduct PP-Ignite-HR-0011 Disciplinary Policy and Procedure PP-Ignite-HR-0005 Conflict of Interest Policy

1. Policy

- 1.1. Ignite Limited (the “Company”) is committed to acting in a lawful, ethical, and socially responsible manner, consistent with the company’s values.
- 1.2. Giving bribes or other improper payments or benefits to public officials is a serious criminal offence under the Australian Criminal Code, and inconsistent with the Company’s values.
- 1.3. The purpose of this Anti-Bribery and Corruption Policy (“Policy”) is to:
 - 1.3.1. Set out the responsibilities of the Company and related bodies corporate and its employees to observe and uphold the prohibition on bribery and improper conduct; and
 - 1.3.2. Provide information and guidance on how to recognise and deal with instances of bribery and corruption.

2. Policy Application

- 2.1. This Policy applies across the Company to the Board of Directors, Chief Executive Officer, Senior Executives and officers, and all other employees of the Company.

3. Policy

- 3.1. The following behaviours are strictly prohibited:
 - 3.1.1. the giving of bribes or other improper payments or benefits to public officials;
 - 3.1.2. paying secret commissions to those acting in an agency or fiduciary capacity;
 - 3.1.3. making donations to any political party; and
 - 3.1.4. soliciting or accepting unauthorised gifts, rewards, or benefits, whatever their nature or value which may place the employee under an obligation to a third party, or which may compromise, or be seen to compromise, the integrity of the employee or the Company.

- 3.2. Gifts, rewards, or benefits of moderate value may be provided or accepted where it is lawful and in accordance with ordinary business practice. Employees should consult their manager if they are in doubt as to whether they should make or accept any offer of a gift, reward or benefit of over AUD\$20 in value.
- 3.3. All employees must comply with the Conflict of Interest Policy with respect to avoiding and disclosing potential or actual conflicts of interests which may include personally accepting anything of value whether cash or otherwise, that conflicts with the individual's duties to the Company.

4. Breach of Policy

- 4.1. Employees are expected to report breaches of this policy to their manager or Human Resources. Breaches of this Policy will be dealt with under the Company's Disciplinary Policy and Procedure. Serious breaches of this policy may also expose the individual to criminal and civil liability and could result in imprisonment or the imposition of a significant financial penalty.