

Anti-Bribery Policy

1. Purpose

Coffee on Cue Pty Ltd is committed to conducting business in an ethical and honest manner, and is committed to implementing and enforcing systems that ensure bribery is prevented. Coffee on Cue has zero-tolerance for bribery and corrupt activities. We are committed to acting professionally, fairly, and with integrity in all business dealings and relationships, wherever in the country we operate.

2. Policy Statement

Coffee on Cue will uphold all laws relevant to countering bribery and corruption in all the jurisdictions in which we operate. However, we remain bound by the laws of Australia, including the Criminal Code Act 1995, in regards to our conduct both at home and abroad.

3. Who is Covered by the Policy?

This anti-bribery policy applies to all individuals working at all levels and grades, including senior managers, officers, directors, employees (whether permanent, fixed-term, or temporary), consultants, contractors, trainees, seconded staff, home-based workers, casual workers, agency staff, volunteers, interns, agents, sponsors, or any other person associated with us, or any of our subsidiaries or their employees, wherever located.

4. Definition of Bribery

Bribery refers to the act of offering, giving, promising, asking, agreeing, receiving, accepting, or soliciting something of value or of an advantage so as to induce or influence an action or decision of an official or individual in a position of trust within an organization. Bribery is illegal and unethical.

5. What is not Acceptable

This policy does not tolerate any form of bribery, either directly or through a third party. Specifically, you must not:

- Give or offer any payment, gift, hospitality, or other benefit in the expectation that a business advantage will be received, or to reward any business received.
- Accept any offer from a third party that you know or suspect is made with the expectation that we will provide a business advantage for them or anyone else.
- Give or offer any payment (in cash or other gifts) to government officials or their representatives to facilitate or expedite a routine procedure.
- Threaten or retaliate against another individual who has refused to commit a bribery offense or who has raised concerns under this policy.

6. Gifts and Hospitality

This policy does not prohibit normal and appropriate hospitality (given and received) to or from third parties, provided the following requirements are met:

- It is not intended to influence a third party to obtain or retain business or a business advantage.
- It does not include cash or a cash equivalent (such as gift certificates or vouchers).
- It is appropriate in the circumstances, taking into account the reason for the gift, its timing and value.
- It is given openly and transparently.
- It complies with local law.
- It is given in the name of the company, not in an individual's name.

7. Responsibilities and Reporting

Everyone employed by or under contract with Coffee on Cue is required to:

- Ensure this policy is understood and implemented within their department or function.
- Prevent, detect and report any bribery or corruption issues to the Compliance Officer.
- Maintain a written record of all hospitality or gifts accepted or offered, which will be subject to managerial review.

We will provide training on this policy as part of the induction process for all individuals who work for us, and regularly after that.

8. Compliance Officer

Coffee on Cue has appointed a Compliance Officer, who is responsible for ensuring compliance with this policy, reviewing the policy annually, and providing guidance on its implementation.

9. Breaches of this Policy

Failure to comply with this policy can result in disciplinary action, which could result in dismissal for gross misconduct. Coffee on Cue Pty Ltd reserves the right to terminate our contractual relationship with any employees who breach this anti-bribery policy.