

Anti-Corruption Policy

1. Purpose

Coffee on Cue Pty Ltd is dedicated to maintaining the highest standards of integrity and professionalism in our business operations. This policy outlines our commitment to act ethically and with integrity in all business relationships and to implementing and enforcing effective systems to prevent corruption.

2. Policy Statement

Coffee on Cue explicitly prohibits all forms of corruption and is committed to conducting its business activities in an ethical and legal manner. We adhere to all laws, regulations, and rules that prohibit corruption and bribery in all the markets and countries where we operate, including compliance with the Australian Criminal Code and the Foreign Corrupt Practices Act (FCPA) for international activities.

3. Scope

This policy applies to all individuals working at or for Coffee on Cue, including employees at all levels, directors, officers, agency workers, contractors, consultants, third-party representatives, and business partners.

4. Definitions

- **Corruption:** Involves the abuse of entrusted power for private gain. This can include bribery and can be known as financial crime.
- **Bribery:** An offer, promise, giving, demanding or accepting of an advantage as an inducement for an action which is illegal or a breach of trust.

5. Prohibited Conduct

Coffee on Cue prohibits:

- The exchange of gifts, rewards, hospitality, or perks of any kind that are intended to influence a decision-maker.
- Kickbacks or any other form of improper payment to secure a contract.
- The use of Coffee on Cue funds or resources to support any corrupt activities.
- The facilitation of payments to obtain a level of service which one would not normally be entitled to.
- Donations to candidates or political parties where these are meant to influence decision-making.

6. Responsibilities

All company personnel must:

- Understand and comply with this policy.
- Promptly report any suspicion of corruption, whether directly observed or inferred, to the designated Compliance Officer.
- Avoid any activities that could lead to, or imply, a conflict of interest with the business activities of Coffee on Cue.

7. Reporting and Compliance

- Employees must report any concerns about corruption or unethical behavior to the Compliance Officer. Such reports will be treated confidentially and investigated promptly.
- The Compliance Officer is responsible for monitoring and reviewing the implementation of this policy and for reporting its findings to the management team at Coffee on Cue.

8. Training and Communication

- Coffee on Cue will provide training on this policy as part of the induction process for all new employees who work for us, and regularly thereafter.
- Our anti-corruption stance will be communicated to all suppliers, contractors, and business partners at the outset of our business relationship with them and as necessary after that.

9. Enforcement and Disciplinary Action

- Any breach of this policy will result in disciplinary action, which may include dismissal for gross misconduct and, if warranted, legal proceedings.
- Coffee on Cue reserves the right to terminate any contractual relationship if the anti-corruption policies are breached.