

Anti-Bribery & Corruption Policy

Commitment to Anti-Bribery and Corruption

Zenergy Asia Pacific Pty Ltd (Zenergy) is dedicated to conducting business in a manner that fully complies with all applicable laws, particularly anti-bribery and anti-corruption legislation in every country where the company and its subsidiaries operate. The organisation upholds high ethical standards and has implemented this Anti-Bribery and Corruption Policy to ensure comprehensive compliance with all relevant anti-corruption laws and regulations in the jurisdictions where Zenergy and its subsidiaries conduct business.

Legal Compliance and Ethical Standards

Bribery is strictly prohibited by law and can result in significant consequences for both Zenergy and its personnel, including fines and imprisonment. Therefore, it is imperative that Zenergy and its subsidiaries adhere to the most stringent or restrictive laws and regulations applicable in any country where they operate. In circumstances where local laws are more rigorous than this Policy, those local requirements take precedence. Zenergy may also issue specific guidance for subsidiaries operating outside Australia to address particular country requirements.

Scope and Application

This Policy outlines Zenergy's expectations and requirements for interactions with Government Officials and Third Parties. It is important to note that while the Policy does not prohibit interactions with Government Officials, it does strictly forbid any corrupt conduct or behaviour in dealings with such individuals.

Standards of Conduct for Zenergy Personnel

- Do not give, offer, accept, or request bribes, facilitation payments, secret commissions, or any other prohibited payments, nor engage in money laundering or cause any of these actions to occur.
- Do not approve, make, accept, or request any irregular payment or anything of value for the purpose of securing business or influencing a business decision in favour of Zenergy.
- Comply with all reporting and approval procedures regarding gifts, entertainment, or hospitality.
- Do not offer or receive gifts, entertainment, or hospitality to or from public officials, government officials, or politicians without obtaining prior approval from the Director.
- Obtain necessary approvals for all donations and sponsorships made on behalf of Zenergy.
- Maintain accurate and detailed records of all dealings with third parties.
- Remain vigilant and promptly report any breaches of this Policy or any suspicious behaviour that may relate to non-compliance.



Dean Woods, Director Zenergy Safety, Health and Wellbeing

Revised and reissued: 13th December 2025