

Anti-Bribery and Corruption Policy

Review

This document was

Reviewed by:	Operations Team	Review/Revise Date:	Feb 2026
---------------------	-----------------	----------------------------	----------

Purpose

This Anti-Bribery and Corruption Policy sets out Whizdom’s commitment to preventing bribery, corruption, and improper conduct in all business activities. The Policy establishes clear expectations and controls to ensure that all business dealings are conducted ethically, transparently, and in compliance with applicable laws.

This Policy applies as a standing corporate policy and replaces the former *Ethics and Anti-Corruption Agreement*. Compliance with this Policy is a condition of employment or engagement with Whizdom.

About Whizdom

Whizdom Pty Ltd is committed to conducting its business honestly and responsibly. We strive to deliver services that are fair, timely, and professional, and we are committed to maintaining trust with clients, partners, and the broader community through ethical conduct.

Scope and Application

This Policy applies to:

- All Whizdom employees
- All contractors and labour-hire personnel
- Agents, consultants, and representatives acting on behalf of Whizdom
- Business partners and third parties where relevant

This Policy applies to all business activities undertaken in Australia and overseas.

Policy Statement

Whizdom has a zero-tolerance approach to bribery and corruption. Bribery or corruption in any form is strictly prohibited.

Bribery includes offering, promising, giving, requesting, or accepting anything of value (financial or otherwise) with the intention of improperly influencing a decision, action, or function.

Corruption includes abuse of entrusted power for private gain and any conduct that compromises impartial decision-making.

Prohibited Conduct

Under this Policy, workers must not, directly or indirectly:

- Offer, promise, give, request, or accept bribes or improper benefits

- Provide or accept gifts, hospitality, or benefits that could improperly influence decision-making
- Make facilitation payments, regardless of local customs or practices
- Make political donations on behalf of Whizdom without authorisation
- Use charitable donations or sponsorships as a means to gain improper advantage
- Allow third parties to engage in bribery or corruption on Whizdom's behalf

Gifts, Benefits, and Hospitality

Gifts, benefits, and hospitality must be:

- Infrequent, modest, and reasonable in value
- Appropriate to the business relationship
- Lawful and transparent
- Not intended to influence, or be perceived as influencing, a business decision

Any gifts or hospitality that may present an actual or perceived conflict of interest must be declared in accordance with Whizdom procedures.

Conflicts of Interest

All actual, potential, or perceived conflicts of interest must be disclosed as soon as they arise. Workers must not allow personal interests, secondary employment, or external relationships to improperly influence business decisions or outcomes.

Responsibilities

Workers

All workers covered by this Policy must:

- Act honestly, ethically, and with integrity at all times
- Familiarise themselves with and comply with this Policy
- Remain vigilant to bribery and corruption risks
- Promptly report suspected or actual bribery or corruption

Management

Managers are responsible for:

- Promoting a culture of integrity and compliance
- Ensuring workers understand this Policy
- Responding appropriately to reported concerns

Third Parties

Whizdom expects business partners, suppliers, and agents to maintain standards consistent with this Policy. Where appropriate, Whizdom may conduct due diligence to assess bribery and corruption risks associated with third parties.

Reporting and Whistleblowing

Any suspected or actual bribery or corruption must be reported promptly through Whizdom's reporting channels or by contacting Whizdom on **1300 944 936**.

Whizdom supports the reporting of concerns in good faith and does not tolerate retaliation against anyone who raises a genuine concern.

Investigations

All reports of bribery or corruption will be taken seriously and investigated confidentially and fairly. Where required, matters will be reported to appropriate regulatory or law enforcement authorities.

Compliance and Breach of Policy

Failure to comply with this Policy may result in disciplinary action up to and including termination of employment or engagement, and may also expose individuals and Whizdom to civil or criminal penalties.

Policy Review

This Policy will be reviewed periodically to ensure it remains effective and aligned with legal and regulatory requirements.