

Anti-Bribery & Corruption Policy

1. Purpose

LaserBond is committed to a high standard of good corporate governance, conduct and ethical behaviour in all business activities, and investor confidence. This policy is to promote and support this commitment by minimising the risk of bribery or corruption occurring, and providing guidance on dealing with instances of bribery and corruption.

2. Bribery & Corruption

LaserBond prohibits all bribery or corruption practices. This prohibition applies globally.

Bribery is the offering, promising, giving, accepting or soliciting of an advantage as an inducement for action which is illegal, unethical or a breach of trust. A bribe itself is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage and can take the form of gifts, loans, fees, rewards or other advantages.

Corruption is the abuse of entrusted power for personal gain.

3. Gifts & Entertainment

Employees are required to discuss with the CEO any offer of a gift or benefit in order to determine the appropriate action. If a gift is received and does not fall within the Acceptable Gifts criteria below they will be stored for release annually through the Christmas raffle for all employees to share in all gifts.

All gifts or benefits must be at an 'arm's length' basis with no special favours, arrangements of obligations, appropriate to the relationship, and complies with relevant laws.

Acceptable Gifts:

- a) Token gifts in the form of corporate branded items (e.g. pens, caps, stationary, coffee mugs, mouse pads, and memory sticks)
- b) Light refreshments or a modest meal during a meetings or as a participant of a seminar, conference or working group
- c) Sponsored attendance at an industry function with a legitimate business benefit and approved by the CEO (or the Board if the CEO is seeking attendance).

If a gift or benefit is deemed to be valued at AUD\$100 or more it must be reported to the CFO to apply to the Gift Register. The Gift Register will be reviewed at least annually by the Risk Committee.

4. Facilitation Payments

Facilitation payments, whether legal or not within a country, are prohibited under this policy. These payments are a form of bribery of a public official to expedite or facilitate the performance of a routine governmental action. This may include processing paperwork, issuing visas or permits, or expediting performance of duties already bound to perform.

5. Political Contributions

LaserBond employees must not, on behalf of the company, make any donations to a political party, politician or candidate for office in any country unless approved in advance by the Board and complies with the laws and government policies of the jurisdiction where the donation is made.



6. Charitable Contributions

LaserBond may only make charitable donations that are legal and ethical under local laws and practices. In Australia this means an organisation must have deductible gift recipient status with the Australian Taxation Office. No charitable donation may be offered without prior approval of the CEO.

7. Consequences of Non-Compliance

All LaserBond employees are required to avoid any activity that may lead to a breach of this policy. Any breach will be investigated and may result in disciplinary action, including immediate termination of employment. Under relevant laws possible consequences may also include criminal and civil liability with associated fines and / or terms of imprisonment.

8. Reporting Non-Compliance

All LaserBond employees have a responsibility to detect, prevent and report instances of bribery and corruption, as well as any suspicious activity or wrong doing in connection with the business. If you have any queries or concerns with any activity these should be raised with the CEO. If you are not comfortable speaking with the CEO, LaserBond has a Whistle-blower Protection Policy providing an employee with protections when making a report.