

Anti Bribery Policy

Aspect is committed to promoting a workplace free of Bribery and Corruption. To ensure we deliver on this commitment, Aspect personnel and those acting on behalf of Aspect will; conduct business in an honest and ethical manner, act professionally, fairly and with integrity in all business dealings and not give, offer, accept or request bribes.

Facilitation payments

- Not give or offer facilitation payments unless a facilitation payment is required to be made to protect against perceived or actual danger to personal safety.

Inducements including gifts and hospitality

- Not offer or accept inducements that are not considered trivial and inconsequential and where there is an actual or perceived intent to improperly influence behaviour

Recruitment and selection

- Will not permit recruitment and selection practices which are susceptible to bribery and corruption.

Sponsorship, charitable & political contributions

- Only permit sponsorship or contributions that are legal and ethical under local laws and practices, approved by the Directors and where there is a bona fide business purpose, and the company has assessed there are no bribery or corruption risks associated with the sponsorship or contribution.

Dealing with third parties

- Offer, solicit or receive a bribe directly or indirectly through a third party
- Decline any efforts made by third parties to unfairly affect any decision-making process in order to achieve an advantage or benefit.

Record keeping

- Maintain accurate records of payment to third parties in accordance with the Corporations Act
- Not make, alter, destroy or conceal an accounting document (including being reckless in their conduct which allowed such an act) to facilitate, conceal or disguise improper conduct

Reporting

- Report any suspected or actual bribery and/or corruption. Any actual or suspected bribery and/or corruption may also be reported to the National Anti-bribery and Corruption Commission (NACC).



Justin Giblett - Director

ASPECT Engineering Solutions

March 2023