



TOTAL RESOURCE SOLUTIONS ANTI CORRUPTION/BRIBERY POLICY

1. Background and Purpose

Total Resource Solutions Pty Ltd (TRS) does not condone bribery or corruption in any form. TRS is committed to conducting business in an ethical and honest manner, and is committed to implementing and enforcing systems that ensure bribery is prevented. We are committed to acting professionally, fairly, and with integrity in all business dealings and relationships, wherever in the country we operate.

This policy is created in line with corruption and bribery as it pertains under the Criminal Code Act 1995 (Aust Cth). It sets out responsibilities for TRS, its agents and employees.

2. Scope

This anti-bribery policy applies to all employees (whether temporary, fixed-term, or permanent), consultants, contractors, trainees, seconded staff, home workers, casual workers, agency staff, volunteers, interns, agents, sponsors, or any other person or persons associated with us (including third parties), or any of our subsidiaries or their employees, no matter where they are located (within or outside of Australia).

3. Definitions

Agent: an owner, director, stakeholder, contractor or other third-party that is in the position to act on behalf of TRS.

Benefit: includes any advantage and is not limited to property. A person is taken to have obtained a benefit for another person if the first-mentioned person induces a third person to do something that results in the other person obtaining the benefit.

Bribe: money or any other valuable consideration given or promised with a view to corrupting the behavior of a person, especially in that person's performance as an athlete, public official, etc.; anything given or serving to persuade or induce.

Employee: any person who is employed by TRS in a part or full-time capacity and in accordance with the labour laws of NSW.

Facilitation payment: customary, unofficial minor payments to secure or speed a routine government action.

4. Policy

At TRS we:

- conduct all business in an honest and ethical manner;
- are committed acting professionally, fairly and with integrity all business dealings and relationships;



- do not permit the making of any inappropriate promises, gifts or excessive hospitality in order to achieve unfair advantage or benefit; and
- resist any efforts made by others (including suppliers, customers or clients) to unfairly affect any official decision making process in order to achieve unfair advantage or benefit.

TRS's employees and agents must :

- conduct all business in an honest and ethical manner.
- be committed to acting professionally, fairly and with integrity in all business dealings and relationships;
- not permit the making of any inappropriate promises, gifts or excessive hospitality in order to achieve unfair advantage or benefit; and
- resist any efforts made by others (including existing or potential suppliers, customers or clients) to unfairly affect any official decision making process in order to achieve unfair advantage or benefit.

We discourage facilitation payments as a means of doing business. We expect our business partners and Agents to implement and enforce effective systems to counter bribery.

Charitable and Political Donations

At TRS, as part of our Corporate Social Responsibility, we support and encourage individual staff members when they are participating in charitable events, donating to charities, or volunteer work. Any charitable donations which are made on behalf of TRS must only be done with approval from a Director. We encourage charitable donations and/or sponsorships only when they are ethical and legal under local laws and practices.

This policy does not impede an individual's freedom to make charitable donations or undertake volunteer work in their own individual capacity.

We do not allow contributions to political parties to be made on behalf of TRS.

Breaches

We will always report and document any breach of the law that is brought to our attention through the reporting mechanism provided by Australian authorities.

A breach of this policy by TRS personnel may be regarded as serious misconduct, leading to disciplinary action, which may include termination of employment. Breach of this policy may also expose an individual to criminal and civil liability.