



# Summary of Anti-Bribery & Anti-Corruption Policy

*For Qube Personnel and Qube Contractors*

---

## WHO DOES THE ABAC POLICY APPLY TO?

Qube's Anti-Bribery & Anti-Corruption (**ABAC**) Policy applies to Qube Holdings Limited and its controlled entities, including joint ventures that are effectively controlled by Qube (**Qube**), and their respective directors, officers and employees (**Qube Personnel**). The ABAC Policy also applies to contractors, sub-contractors, consultants and advisers (as well as agents, distributors and business representatives) or any other entity or person while they are acting for or on behalf of, or providing services to or for, Qube (**Qube Contractors**). Qube Personnel and Qube Contractors are collectively referred to as **Qube Representatives** in the ABAC policy.

## PURPOSE OF THE ABAC POLICY

The ABAC Policy is part of Qube's commitment to uphold ethical business practices and meet all legal requirements. The purposes of the ABAC Policy is to:

- (a) set out the responsibilities of all Qube employees and contractors in upholding the prohibitions on bribery, facilitation payments, secret commissions and kickbacks, money laundering and corrupt conduct generally (**bribery and corruption**).
- (b) provide guidance on how to recognise and report instances of bribery and corruption.
- (c) provide guidance on giving and receiving gifts, entertainment, hospitality and charitable or political donations.
- (d) provide guidance in all dealings with Qube contractors and other third parties.

## WHAT DOES THE ABAC POLICY SAY?

### (a) Prohibition of Bribery and Corruption

All Qube Representatives are **prohibited** from:

- i. engaging in any form of **bribery** which is conduct inducing or rewarding a person by directly or indirectly offering, giving, authorising, requesting or accepting money or anything else of value which is intended to improperly influence the person to provide a commercial, contractual, regulatory or personal advantage.
- ii. engaging in **corrupt conduct** which is any dishonest or fraudulent misuse of a position of power, influence or a person's employment, in order to gain, directly or indirectly, a benefit from doing or not doing a certain thing, or misusing information or knowledge held by the person for a reward (this may include creating or using falsified documentation or concealing or destroying documentation).
- iii. making **facilitation payments** which are unofficial payments made to any public official to speed up or secure the performance of a government decision or action that is routine or would have been made or occurred in the ordinary course.
- iv. paying or receiving **secret commissions or kickbacks** which are payments or other benefits given to an employee or agent acting on behalf of a principal which the employee or agent does not disclose to the principal
- v. participating in **money laundering** which occurs when a person or entity conceals an illegal source of income or disguises income from an illegal source to make it appear legitimately earned.

### (b) Gifts, Entertainment and Hospitality

The ABAC Policy provides a mechanism to approve the giving or receiving of gifts, entertainment or hospitality. Approvals must be sought in accordance with, and the proposed benefit must meet the requirements as set out in, the policy. See the next page for a summary of the requirements.

In all cases, the ABAC Policy prohibits Qube Representatives, in connection with a Qube business matter, from giving or receiving a gift, entertainment or hospitality (including sponsored travel or similar benefits) where doing so might amount, or create the impression of a benefit amounting, to bribery or corruption.

### (c) Donations and Sponsorships

Donations and sponsorships must not be given or received as a means of making improper payments. All political donations and sponsorships are prohibited except where prior approval in writing has been given by Qube's Managing Director in accordance with Qube's internal Delegation of Authority Policy.

### (d) Relations with Contractors and Third Parties

Qube Representatives must ensure their engagement with Qube Contractors and other third parties must be subject to preliminary due diligence and ongoing monitoring and review to ensure such persons are aware of and agree to comply with the ABAC Policy and all applicable laws while undertaking work for Qube.

## WHAT DO I NEED TO DO IF I UNCOVER OR SUSPECT BRIBERY AND CORRUPTION?

All Qube Representatives must notify of any instance of, or circumstances giving rise to reasonable grounds to suspect, bribery or corruption by the means set out in the ABAC Policy and the Qube Whistleblower Policy.

If you are unsure whether a particular matter constitutes bribery or corruption, or have any other queries or concerns, these should be raised with Qube Legal ([legal@qube.com.au](mailto:legal@qube.com.au)).

## WHERE CAN I FIND A CURRENT VERSION OF THE QUBE'S POLICY?

Current versions of the ABAC Policy, a summary of the policy and related documents (Qube's Statement of Values, Sanctions Policy, Code of Conduct & Ethics and Whistleblower Policy) are available on Qube's employee intranet and in the following sections of Qube's website:

- Ethical Conduct: [www.qube.com.au/about/ethical-conduct](http://www.qube.com.au/about/ethical-conduct).
- Governance: [www.qube.com.au/about/governance](http://www.qube.com.au/about/governance).

REQUIREMENTS OF ALL QUBE REPRESENTATIVES	
ALWAYS...	NEVER...
<ul style="list-style-type: none"><li>✓ Act in the best interests of Qube at all times.</li><li>✓ Comply with the law, ABAC Policy, Code of Conduct &amp; Ethics and any other applicable Qube policies or procedures.</li><li>✓ Obtain proper approval for and properly record any donations, sponsorships, charitable contributions, gifts and entertainment (<b>Benefits</b>) you accept from, or give to, a third party on behalf of Qube.</li><li>✓ Benefits must be a token of goodwill or common courtesy associated with standard business practice, impose no obligation or expectation, be of relatively low value and in all cases be legal.</li><li>✓ Obtain prior written approval before:<ul style="list-style-type: none"><li>– <b>offering</b> a gift, entertainment or hospitality valued above AUD \$250 (or equivalent) (or AUD \$100 if in Indonesia or PNG).</li><li>– <b>receiving</b> or accepting a gift valued above AUD \$500 (or equivalent) or entertainment or hospitality valued above AUD \$1,000 (or equivalent).</li></ul></li><li>✓ Qube Representatives must ensure that the Qube Contractors for whom they are responsible are provided with the ABAC Policy and this ABAC Policy summary.</li><li>✓ Qube Representatives must use all reasonable efforts to ensure Qube Contractors comply with the ABAC Policy, including the requirements for notification and approval of any gift, hospitality or entertainment intended to be given or received by a Qube Contractor, if such benefit could be perceived as potentially influencing or otherwise connected with a Qube business matter.</li><li>✓ Ensure that third parties who engage with Qube can either comply with the ABAC Policy or have in place equivalent policies and procedures.</li><li>✓ Be alert to indications in the course of dealings with third parties that might suggest the existence of, or potential for, bribery and corruption.</li><li>✓ Immediately report suspicious or unusual financial transactions.</li><li>✓ Immediately report any conduct that may be in breach of the law, the Code, ABAC Policy or any other Qube policies or procedures.</li></ul>	<ul style="list-style-type: none"><li>✗ Offer or accept any bribe, including money or anything else of value, which may improperly influence a person (no matter how large or small in value).</li><li>✗ Improperly use your authority or position with Qube to further your own personal interests or help others to do so.</li><li>✗ Make any facilitation payments to any public official or other person with authority to make a decision on a Qube business matter.</li><li>✗ Offer or accept secret commissions or kickbacks (no matter how large or small in value).</li><li>✗ Conceal or disguise income from an illegal source to make it appear legitimately earned.</li><li>✗ Offer or receive a gift, entertainment or hospitality that:<ul style="list-style-type: none"><li>– can amount to, or create the impression of a benefit amounting, to bribery or corruption.</li><li>– can create any obligation or expectation that could conflict with your work at or for Qube.</li></ul></li><li>✗ Pay or offer any donation, sponsorship or other payment to a political party without the prior written approval from Qube's Managing Director.</li><li>✗ Give or receive any donation or sponsorship to a charity or community cause as a means to conceal direct or indirect bribery or corruption.</li></ul>

If you are unsure whether a particular matter constitutes bribery or corruption or have any other queries or concerns, these should be raised with your supervisor, a senior manager or Qube Legal ([legal@qube.com.au](mailto:legal@qube.com.au)).