

# Anti-Bribery and Corruption Policy

ResponsibleSteel Ltd  
ACN 610 479 000

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## 1. Our business

ResponsibleSteel Ltd (**ResponsibleSteel**) is a not-for-profit Australian registered company operating in Australia and overseas.

As a registered charity with overseas operations, ResponsibleSteel is required under Standard 1 and 3 of the ACNC External Conduct Standards to comply with Australian laws, including anti-bribery and corruption laws, and to minimise any risk of risk of corruption, fraud, bribery or other financial impropriety by its responsible entities, employees, volunteers and third parties outside Australia.

The board of directors of ResponsibleSteel is committed to conducting its business in an honest and ethical manner and has adopted this policy to provide a framework for the avoidance and risk management of bribery and corruption which may otherwise occur in the operations of ResponsibleSteel.

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## 2. Policy objective

This document is the Anti-Bribery and Corruption Policy (the **Policy**) for ResponsibleSteel. This Policy supplements and must be read in conjunction with ResponsibleSteel's Internal and External Conduct Policy.

The overarching objectives of this Policy are to:

- set out ResponsibleSteel's responsibilities, and the responsibilities of those working for ResponsibleSteel, in observing and upholding ResponsibleSteel's position on bribery and corruption; and
- provide information and guidance to those working for ResponsibleSteel on how to recognise and deal with bribery and corruption issues.

If ResponsibleSteel is found to have taken any part in bribery or any other related improper conduct addressed by this Policy, ResponsibleSteel could face significant fines and damage to its reputation. Individuals found guilty may also be subject to monetary penalties and/or imprisonment and could face damage to their personal and professional reputations. ResponsibleSteel therefore takes its legal responsibilities and any breaches of this Policy extremely seriously.

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### 3. Definitions

In this Policy:

- (a) An **advantage** includes anything of value, such as money, gifts, loans, fees, hospitality, services, discounts or the award of a contract.
- (b) **bribery** means the act of offering, promising, giving or accepting any financial or other advantage, to induce the recipient or any other person to act improperly in the performance of their functions, or to reward them for acting improperly, or where the recipient would act improperly by accepting the advantage. Bribery includes bribery of a foreign public official or Commonwealth public official as defined under the *Criminal Code Act 1995* (Cth).
- (c) **corruption** means the abuse of entrusted power or position for private gain.
- (d) A person acts **improperly** where the person acts illegally, unethically, or contrary to an expectation of good faith or impartiality, or where they abuse a position of trust. The improper acts may be in relation to any business or professional activities, public functions, acts in the course of employment, or other activities by or on behalf of any organisation of any kind.
- (e) **Representative** means an officer or employee of ResponsibleSteel, wherever located.

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### 4. Scope

This Policy applies to all Representatives of ResponsibleSteel.

ResponsibleSteel takes a zero-tolerance approach to bribery and corruption and is committed to acting professionally, fairly and with integrity in all its business dealings and relationships wherever ResponsibleSteel operates and to implement and enforce effective systems to counter bribery and corruption.

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### 5. ResponsibleSteel's responsibilities

The board of ResponsibleSteel has overall responsibility for ensuring this Policy complies with ResponsibleSteel's legal and ethical obligations, and that those under ResponsibleSteel's control comply with it. The board of ResponsibleSteel is responsible for reviewing allegations of breach of this Policy, and conducting reviews of this Policy when it sees fit.

ResponsibleSteel senior management has primary responsibility for the implementation, administration, and monitoring of the effectiveness of this Policy.

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### 6. Representatives' responsibilities

Each of ResponsibleSteel's Representatives is required to:

- (a) ensure that they read, understand and comply with this Policy;
- (b) avoid engaging in any acts of bribery or corruption or activities that may lead to an act of bribery or corruption being made on behalf of ResponsibleSteel;

### 3.

- (c) comply with all applicable laws;
- (d) immediately report concerns or allegations of bribery or corruption to ResponsibleSteel; and
- (e) immediately disclose all charges, convictions and other outcomes of an offence, which occurred before or occurs during their association with ResponsibleSteel that relate to bribery or corruption.

A failure to comply with any of the above responsibilities is a breach of this Policy.

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## 7. Acts of bribery or corruption

It is not acceptable for a Representative (or someone on the Representative's behalf) to:

- (a) give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that an advantage will be received, or to reward an advantage already given;
- (b) give or accept a gift or hospitality during any commercial negotiations or tender process, if this could be perceived as intended or likely to influence the outcome;
- (c) accept a payment, gift or hospitality from a third party that you know or suspect is offered with the expectation that it we will provide an advantage for them or anyone else in return;
- (d) accept hospitality from a third party that is unduly lavish or extravagant under the circumstances;
- (e) offer or accept a gift to or from government officials or representatives, or politicians or political parties;
- (f) threaten or retaliate against another individual who has refused to commit an act of bribery or corruption or who has raised concerns under this Policy; or
- (g) engage in any other activity that does or may lead to a breach of this Policy.

This list of acts of bribery or corruption is non-exhaustive.

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## 8. Reporting procedures

If a Representative is offered a bribe, or is asked to make one, or if the Representative believes or suspects that any bribery, corruption or other breach of this Policy has occurred or may occur, that Representative must notify his or her supervisor as soon as is practicable.

The Board must be notified of any material incident of actual or alleged bribery or corruption.

If a Representative are unsure about whether a particular act constitutes bribery or corruption, the Representative must raise the matter with his or her supervisor.

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## 9. Protection of individuals who raise bribery or corruption concerns

Individuals who refuse to accept or offer a bribe, or who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. ResponsibleSteel aims to encourage openness and will support anyone who raises genuine concerns in good faith under this Policy, even if they turn out to be mistaken.

ResponsibleSteel is committed to ensuring no one suffers any detrimental treatment as a result of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion that an actual or potential bribery or corruption has taken place, or may take place in the future.

Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.

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## 10. Breaches of this Policy

if any Representative is found to have engaged in, or to be engaging in, behaviour that is prohibited by this Policy, that person will be the subject of appropriate disciplinary action, as determined by ResponsibleSteel in its absolute discretion.

A Representative suspected of a breach of this Policy may be suspended from their duties whilst any relevant investigation is being conducted.

ResponsibleSteel may also report any matter to the relevant law enforcement or regulatory authorities, and provide all necessary assistance in any subsequent investigations or prosecutions.

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## 11. Availability

ResponsibleSteel will ensure all Representatives have access to this Policy.

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## 12. Review of this Policy

The Board is responsible for undertaking an annual review of this Policy each calendar year, and after any material incident.

This Policy may be amended only by resolution of the Board.

### Contacts

For questions about this Policy, contact Annie Heaton [aheton@responsiblesteel.org](mailto:aheton@responsiblesteel.org).

 May 2023