



GLOBE INTERNATIONAL LIMITED (“Globe”)
ANTI-BRIBERY AND CORRUPTION POLICY

Globe takes a zero tolerance approach to bribery and corruption. This policy is in place to clearly identify the types of activities that are, or could be perceived to be, in the nature of a bribe or any form of corruption, and to expressly prohibit Globe’s directors, employees and contractors from entering into any such activity.

Clarification of prohibited activities

Offering a bribe to a government official and the receipt of a bribe from a government official is prohibited under Australian law and the laws of most countries. These laws allow for criminal prosecution of persons and organizations involved in bribery, with severe criminal and civil penalties.

In addition to the risk of criminal prosecution, Globe takes seriously the risk of reputational damage that could be caused if anyone associated with the organization was to be involved in, or was perceived to be involved in, any sort of bribery or corruption.

A bribe includes any financial or other inducement or reward for an action which is illegal, unethical, a breach of trust or improper in any other way. Bribes can take the form of money, gifts, loans, fees, hospitality, services, discounts, the award of a contract or any other advantage or benefit that is intended to influence a decision or action.

Corruption includes any form of abuse of power for business and/or personal gain and may include, but is not limited to, bribery.

Globe’s directors, employees and contractors are strictly prohibited from making payments or payments in kind (gifts, favours, etc.) to influence individuals to award business opportunities to Globe or make business decisions in Globe’s favour.

Similarly, receipts of cash or receipts of significant gifts, favours etc. from suppliers by Globe’s directors, employees and contractors is strictly prohibited under Globe’s supplier related policies. There is an allowance for the acceptance or offering of insignificant gifts, such as give-aways but under Globe’s policies all such gifts must be disclosed to senior management.

All Globe sourcing employees are reminded annually of their obligations to maintain sourcing and procurement relationships that are free from fraud, bribery and corruption. Any Globe employee that receives a gift from a supplier or other contact is required to disclose this fact to their manager.

Reporting a breach of this policy

Any incident that is, or could be perceived to be, in the nature of a bribe or any form of corruption must be reported to the Company Secretary immediately. This report should be made by any person who becomes aware of the activity, whether directly involved, or not.

Consequences

Any employee or director who breaches this policy (or the spirit of this policy) will face disciplinary action, which could result in instant dismissal. Any non-employee who breaches this policy may have their contract terminated with immediate effect. Where a breach of this policy amounts to an offence, under anti-bribery legislation the person concerned may also face criminal prosecution.