

Glennon Small Companies Limited

# Anti-bribery & Corruption Policy

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# Anti-bribery & Corruption Policy

## 1. Introduction

This Anti-bribery & Corruption Policy (**Policy**) applies to all Directors, Officers, Contractors, Consultants, Third Parties and Associated Persons in connection with Glennon Small Companies Limited (**Company**).

It is the responsibility of each, Contractor and Consultant to be aware of and compliant with this Policy.

## 2. Purpose

The purpose of the of this Policy is to summarise the Company's approach to managing its risk to bribery and corruption.

This Policy also aims to support the internal governance framework of the Company, and its commitment to fostering a corporate culture that embraces high standards of honesty, integrity, ethical and law-abiding behaviour expected of Directors, Officers, Contractors, Consultants, Third Parties and Associated Persons.

## 3. Bribery & Corruption

**Bribery** is commonly defined as the act of offering or receiving payment, or the provision of payment in exchange for a benefit that is not legitimately due to that person. It is done with the intention to influence persons who hold appointed positions to misuse their authority.

**Corruption** is the form of dishonesty and misuse of power by a person or organisation for private gain.

Individuals or businesses who are found in breach of bribery and corruption laws may face significant civil and criminal penalties which may result in imprisonment and/or fines.

## 4. Policy

The Policy explicitly prohibits the following:

1. Paying or receiving bribes, secret commissions, or other prohibited payments from public officials, their associates or those acting in an agency or fiduciary capacity, or cause any of them to be given, offered, accepted or requested.
2. Making improper payments as described above, through third parties.
3. Offering or giving Facilitation Payments (even if the conduct is customary) or payment of cash or cash equivalents to a government officer.
4. Receiving or offering any gifts, entertainment or hospitality of a value greater than \$200
5. Donating to political parties.
6. Charitable donations that are illegal and unethical under local laws and practices.

The Company Secretary should at least annually monitor the gift register to ensure that gifts and their frequency or regularity may not compromise the Company's reputation of integrity, transparency and being free of undue influence.

## **5. Reporting of unlawful and unethical behaviour**

Any breaches, or suspected breaches of the law, or unethical behaviour which becomes known must be reported to the Chairman or the Board as a whole. Any breaches reported will be properly investigated and appropriate action to be taken.

If there are any concerns in approaching the Chairman or the Board for any reason, the Company has a *Whistleblower Policy* which affords protection against reprisal, harassment or demotion for making the report.

## **6. Policy Availability, Education and Training**

This Policy is publicly made available at <https://www.glennonsmallcompanies.com.au/>.

A copy of this Policy has been provided to the Company's investment manager, Glennon Capital Pty Ltd, and each of its board members and employees. The Policy has further been provided to all Directors and Officers of the Company, and will be included in any induction materials provided to future Directors and Officers of the Company.

Other service providers to the Company will be notified that a copy of this Policy is available for download via the Company's website (if requested).

## **7. Review and Reporting**

The Board has overall responsibility for ensuring this policy complies with legal and ethical obligations, and that all those under the Company's control comply with it.

The Company will review the effectiveness and relevance of this Policy (and associated procedures) once every two years.

Approved by the Board on 20 August 2020