

Policy

Anti-Bribery & Corruption

1. Introduction

TechnologyOne has numerous stakeholders that rely on it to operate in an ethical, open and accountable way with a high standard of integrity by its numerous stakeholders. These stakeholders include customers, employees, suppliers, shareholders and the communities we operate in.

This Policy provides guidance on how this is achieved, and should be read in conjunction with the Code of Business Conduct.

2. What is Bribery & Corruption?

Bribery

Bribery is defined as the giving, offering, promising, soliciting, receiving, agreeing to receive, or acceptance of an advantage (financial or otherwise) which is intended to influence the recipient to corruptly or improperly exercise their powers. A bribe can include an inducement or a reward, a loan, fee or gift.

Corruption

Corruption is defined as the misuse or abuse of power entrusted to an Employee for personal gain.

3. Who is bound by this Policy?

This Policy applies to everyone who works at TechnologyOne including:

- Employees (whether permanent, fixed-term or part-time)
- Contractors
- Consultants
- Secondees
- Directors

Bribery and corruption, in many cases, is considered illegal in many countries globally, so it applies to all employees irrespective of which jurisdiction they operate in. It is also a reflection on TechnologyOne as a whole and is therefore not tolerated. This Policy will refer to this list collectively as Employees.

4. How does this involve you?

Employees may be impacted by this through giving gifts or entertaining customers (including existing or potential customers) or by being offered gifts or entertainment by suppliers of TechnologyOne.

Employees must not:

- bribe another person
- receive a bribe
- destroy, amend, alter or hide a document that shows the payment or receipt of a bribe.

Employees must:

- Act with the highest standard of integrity and ethical behaviour at all times
- Immediately report any breaches of this policy
- Ensure that reference to this policy and the TechnologyOne's Code of Business Conduct is included in engagement documentation to establish the standard with which TechnologyOne will conduct business with third parties.

5. Why is this important?

TechnologyOne is relied upon by its stakeholders to operate in an open and accountable way. As mentioned, bribery and corruption is deemed a criminal offence in many countries and, as such, the offending Employee may face criminal charges.

TechnologyOne takes a zero-tolerance approach to bribery and corruption and, as such, breaches of this policy will be handled seriously and may result in termination of employment if an Employee is found to have contravened this Policy. This Policy will be reviewed annually.

TechnologyOne complies with all applicable bribery and corruption laws relevant to the jurisdictions in which it operates, which include UK Bribery Act 2010, Australian Criminal Code Act 1995 (Cth), Malaysian Anti-Corruption Act 2009 and Organised Crime & Anti-Corruption Legislation Bill (NZ).

6. Public Officials and Government Officials

TechnologyOne produces and supplies products to government departments and local governments. As such, it deals with numerous public officials which poses a high risk in relation to bribery due to the strict rules and conditions which apply to government officials in many countries. These organisations have strict rules in place regarding the receipt of gifts and benefits and require complete transparency.

The provision of any gift, entertainment or benefit, no matter how small, is often required by the public official to be reported. It is imperative that any gift, benefit or entertainment provided to any public official, no matter how small, should be clearly documented in case of an enquiry. This documentation should include the date provided, which public officials were involved, what was provided and how much it cost (including meals).

7. Reporting

It is important that you report to relevant people mentioned below:

- If you are offered a bribe
- If you see an Employee being offered a bribe
- If you see an Employee offer a bribe.

These should be reported to your supervisor, leader or your P&C contact. Other resources you can contact include:

- Company Secretary / Head of Compliance by email or call +61 7 3167 7300
- Group Legal Director by email or call +61 7 3167 7300

- Email T1groupriskcompliance@technologyonecorp.com
- Whistleblower Service by email makeareport@stopline.com.au or call 1300 30 45 50

8. Protection for Reporting Concerns

It is acknowledged that employees may have concerns about the repercussions of not accepting or offering a bribe or reporting where they have observed or been made aware of a bribe. TechnologyOne encourages openness and will support anyone who raises genuine concerns in good faith. TechnologyOne has established a Whistleblower Policy for these instances.

TechnologyOne's Independent Whistleblower Service	
Provider	Stopline Pty Ltd
Phone	1300 30 45 50
Email	makeareport@stopline.com.au
Web	https://technologyonecorp.stoplinereport.com
Post	C/o Stopline, PO Box 403, Diamond Creek, VIC 3089
Operating hours	Web available 24 hours, 7 days per week. Phone available from Monday to Friday, 8.00am to 8.00pm (AEDT)
Support	Smart phone APP, national relay services and translation services available

Where disclosures are made in accordance with the Policy, the necessary protections, including confidentiality, anonymity and safeguarding against detriment, will apply. Where a disclosable matter relates to conduct outside of Australia, or the eligible whistleblower is based outside of Australia, there may be other specific requirements/considerations which impact TechnologyOne's management of the disclosure.

9. Training

TechnologyOne will provide trainings on this Policy as part of the induction process for all new Employees and annual training will be provided online whereby Employees will formally accept that they will comply with this policy.

This Policy should be read in conjunction with:

- Code of Business Conduct
- Whistleblowing Policy
- TechnologyOne Way
- Compelling Customer Experience
- Open Door
- Sales Ethics
- Your employment agreement.