

Anti-Bribery & Corruption Policy



OUR COMMITMENTS

HQPlantations is committed to upholding the highest standards of lawful and ethical conduct, and in demonstrating fairness, integrity and accountability in all of its dealings and operations. In line with this commitment, HQPlantations prohibits all forms of bribery and corruption within its business.

This policy sets out the responsibilities of our employees and agents in observing and upholding the prohibition on bribery and related improper conduct.

EMPLOYEE AND AGENT RESPONSIBILITIES

All forms of direct or indirect bribery and corruption by HQPlantations' employees and agents are prohibited. Examples of prohibited conduct include:

- directly or indirectly, giving, offering, promising, authorising, accepting or requesting anything of value, including offering kickbacks, rewards or other advantages;
- making an unofficial payment to a public official (including an employee, elected official or contractor of a government body or state owned or state controlled enterprise) either directly or indirectly to expediate or secure the performance of a routine government action (for example, to facilitate the expedition of an application);
- soliciting, giving or receiving any form of gift, gratuity, special allowance, favour or an unreasonable benefit to or from an individual or business, if the benefit could unduly influence the judgment of the receiver by creating a disproportionate obligation to return the favour or by creating an appearance of impropriety (for example, giving or receiving gifts, entertainment, hospitality or charitable donations which are not in accordance with HQPlantations' guidelines and standards);
- making a secret payment or commission to a third party as an inducement for that person to use their position to influence the conduct of their principal's business (for example, a payment to an employee or agent of a customer, where the employee or agent does not disclose the payment to the customer, in return for obtaining a commercial advantage to HQPlantations from that customer);

- all forms of money laundering in connection with HQPlantations' business operations; and
- making a business decision that is likely to be suspected of, or will result in personal gain to the employee making that decision.

All HQPlantations employees and agents must:

- read, understand and comply with this policy;
- not give, offer, accept or request bribes, secret commissions, facilitation or other prohibited payments, or other things of value, to win business or influence decisions;
- comply with any reporting and approval process for gifts, entertainment and hospitality;
- not offer or receive any gifts, entertainment, or hospitality to or from a Public Official which is designed to exert influence or obtain unfair advantage;
- obtain any approvals required for donations and sponsorships;
- maintain accurate records when dealing with third parties; and
- exercise diligence and report any breaches of, or suspicious behaviour related to this policy [to your Group Manager or Chief Executive Officer].

BREACH OF POLICY

Bribery, corruption and the other types of improper conduct described in this policy are prohibited under legislation, HQPlantations' Code of Business Conduct and this policy. If an employee engages in any form of bribery or corruption they may have committed serious misconduct and therefore in breach of HQPlantations' Code of Business Conduct, which may result in termination of their employment. If an agent engages in any form of bribery or corruption their contract may be terminated.