Classification: Public

Anti Bribery & Corruption Policy

Coverage	*Iress employees, directors, contractors, agents, external consultants and any third party representatives and business partners.*
Geographic scope	*Global*

1. Introduction

Iress is committed to conducting business with the highest level of integrity. Bribery and corruption are serious criminal offences that threaten Iress's stability and reputation, undermine fair markets and damage communities.

Iress will take all necessary steps to ensure that bribery and corruption do not occur in its business activities.

2. Who must comply with this policy?

This policy applies to all persons working for Iress or on our behalf in any capacity, including Iress employees, directors, contractors, agents, external consultants and any third party representatives and business partners.

3. Global Anti-Bribery and Corruption Standard

Iress will comply with all anti-corruption and bribery laws in all jurisdictions that it operates[1]. Iress operates under a single, global Anti-Bribery and Corruption standard that meets or exceeds the requirements of all jurisdictions in which we operate.

Iress will apply this highest standard to all Iress People and third parties, regardless of local laws or customs which may be less restrictive. Iress notes that conduct occurring in one country may be subject to prosecution in others (specifically under Australian and UK law[2]).

4. Prohibitions

Iress has a strict zero-tolerance rule for bribery and corruption. This applies regardless of local custom, "industry standard," or the competitive pressure of a specific market. You must avoid any action that is or can be perceived as bribery or corruption. Bribery usually also involves a form of corruption but corruption may not always involve bribery.

[1] *Iress will comply with the specific anti-corruption legal requirements in every jurisdiction where we operate, including but not limited to: Australia: Criminal Code Act 1995 (Cth); United Kingdom: Bribery Act 2010; South Africa: Prevention and Combating of Corrupt Activities Act 2004; Singapore: Prevention of Corruption Act 1960; Canada: Corruption of Foreign Public Officials Act; New Zealand: Crimes Act 1961 and Secret Commissions Act 1910.*

[2] *Under the Criminal Code Act 1995 (Cth) (Australia) and the Bribery Act 2010 (UK), Iress and its Personnel can be subject to criminal prosecution in Australia or the United Kingdom for acts of bribery committed anywhere in the world. This liability applies regardless of the local customs of the country where the conduct occurred or the nationality of the parties involved. For the purpose of UK law, this jurisdiction extends to any "associated person" (including vendors and agents) performing services for Iress, irrespective of where that person is situated.*

Prohibited Conduct

- **Direct Bribery:** You must never offer, give, promise, ask for, solicit, or accept a bribe. A bribe can be anything of value, not only cash, that is provided as an inducement or reward for a person acting or refraining to act in a certain way (and could include for example, the grant of contracts, positions of employment, or preferential treatment for a relative).
- **Indirect Bribery:** You cannot "look the other way" while a third party (e.g. colleague, consultant or agent) pays a bribe on behalf of Iress. If you suspect somebody is acting for or on behalf of Iress in a corrupt way, you must report it.
- **Corruption:** You must not behave in a **d**ishonest way in which you act contrary to the interests of the organisation and misuse or abuse your position of power or trust for personal gain, or to unfairly help or harm someone else.
- **Facilitation Payments:** You must not make "facilitation" or "grease" payments to speed up routine government actions. While some local laws may permit small "facilitation payments," Iress prohibits them, without exception.
- **Secret Commissions:** You must not pay or receive "kickbacks" or secret commissions to ensure a business advantage.
- **Political & Charitable Donations:** You must not make donations on behalf of Iress to influence any regulatory or commercial decision.

5. Gifts and Hospitality

You must review and adhere to the Iress Gifts and Hospitality Policy.

Of note, Iress prohibits the use of gifts or hospitality to improperly influence business outcomes. You must not offer or accept hospitality during an active tender, contract renewal, or price negotiation.

6. Conflicts of Interest

You must review and adhere to the Iress Conflict of Interest Policy.

A conflict occurs when personal activities, financial stakes, or relationships overlap with professional duties in a way that compromises, or appears to compromise, objectivity. You must formally disclose all actual, potential, or perceived conflicts of interest as soon as they arise. You must comply with all removal and mitigation steps, including withdrawing yourself from any discussion or decision-making related to the matter.

The active concealment of a conflict is a significant breach of trust and a violation of the terms of employment.

7. Third-Party Management

Iress can be held liable for the actions of its partners. To ensure that Iress has effective anti-corruption safeguards, Iress requires:

- **Contractual Clauses:** Where possible, agreements Iress has in place with third-parties should include anti-bribery clauses.
- **Mergers & Acquisitions:** Iress conduct thorough Anti-Bribery and Corruption due diligence on any target company prior to acquisition.

8. Training & Attestation

All Iress People must complete annual Anti-Bribery and Corruption training. All Iress People will be required to provide a signed annual attestation confirming that they have read, understood, and complied with this policy.

9. Record Keeping & Monitoring

You must declare and keep a written record of all hospitality or gifts given or received. You must also submit all expenses claims relating to hospitality, gifts or payments to third parties in accordance with Iress' Expenses Policy and record the reason for expenditure.

All accounts, invoices, and other records relating to dealings with third parties including suppliers and customers should be prepared with strict accuracy and completeness. Accounts must not be kept "off-book" to facilitate or conceal improper payments.

Iress may use automated monitoring and AI-facilitated tooling to review expense reports, invoices, and vendor payments for "red flag" patterns (such as round-sum payments or offshore transfers). Any monitoring will be conducted in accordance with applicable data privacy laws.

10. Violations and Reporting

Adherence to this policy is a condition of engagement for all Iress People. Any form of bribery and/or corruption is a serious breach of professional conduct and the terms of employment at Iress.

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct.

Reporting Breaches: If you suspect this policy is being or has been breached, it is paramount to raise your concerns directly with Legal and Compliance. It is not necessary to absolutely know that bribery or corruption has occurred before reporting. Suspected breaches of this policy can also be disclosed under the Iress Whistleblowing Policy.

11. Jurisdictional Reporting & Law Enforcement Disclosure

Statutory Reporting Obligations

In specific jurisdictions, Iress and its People are subject to mandatory statutory reporting requirements. Failure to adhere to these requirements is a criminal offence.

- **South Africa:** Under the Prevention and Combating of Corrupt Activities Act 2004 (PRECCA), any person in a position of authority who knows, or ought reasonably to have known or suspected, that an offence of corruption has been committed involving an amount of R100,000 or more, must report such knowledge or suspicion to the South African Police Service (SAPS).
- **Singapore**: Under the Corruption, Drug Trafficking and Other Serious Crimes (Confiscation of Benefits) Act, there is a mandatory obligation to report any suspicious transaction that may be related to criminal conduct to the Suspicious Transaction Reporting Office.

Discretionary Law Enforcement Disclosure

In jurisdictions where no specific statutory obligation to report exists (such as Australia, the United Kingdom, Canada, and New Zealand) Iress may, at its absolute discretion, disclose any suspected or actual breach of this policy, or any related illegal activity, to the relevant law enforcement agencies (including but not limited to the AFP, SFO, or RCMPC).

Iress will cooperate fully with any lawful investigation conducted by a government or law enforcement agency. Iress will consider voluntary self-reporting to regulators as a primary mechanism to establish an "adequate procedures" or "effective compliance" defence under the laws of Australia and the United Kingdom.