

Anti-Corruption and Bribery

This policy sets out our position on bribery and corruption and our responsibilities in relation to preventing it in our business activities, both in relation to those who work for us and those who work with us. The policy also provides information on how to recognize bribery and what to do if you are asked to bribe, you are being asked to accept a bribe, or suspect bribery or corruption is taking place.

All CCSI employees must read, understand and comply with this policy and must avoid any activity that might lead to, or suggest, a breach of this policy.

Who is Covered by the Policy?

This policy applies to everyone working within CCSI, regardless of level/grade. This includes senior managers, officers, directors, employees (whether permanent, fixed-term or temporary), consultants, contractors, trainees, seconded staff, home-workers, casual workers and agency staff, volunteers, interns, agents, and sponsors. We have collectively referred to as these people as 'workers' in this policy.

This policy also applies to any other persons associated with CCSI. This includes any individual or organization we may come into contact with during the course of employment duties. We collectively refer to these people as 'third parties.'

What is bribery and why is having an anti-bribery policy important?

A bribe is a financial or other inducement or reward that is sought, offered, promised or provided with the intention of gaining any commercial, contractual, or personal advantage.

The following are some examples of what a bribe may consist of:

Offering a bribe

- You offer a potential client tickets to a major sporting event but only if they agree to do business with us.

This would be an offense as you are making the offer to gain a commercial and contractual advantage. We may also be found to have committed an offense because the offer has been made to obtain business for us. It may also be an offense for the potential client to accept your offer.

Receiving a bribe

- A supplier gives your nephew a job but makes it clear that in return they expect you to use your influence in our organization to ensure we continue to do business with them.

It is an offense for a supplier to make such an offer. It would be an offense for you to accept the offer as you would be doing so to gain a personal advantage.

Bribing a foreign official

- You arrange for the business to pay an additional payment to a foreign official to speed up an administrative process, such as clearing our goods through customs.

The offense of bribing a foreign public official has been committed as soon as the offer is made. This is because it is made to gain a business advantage for us. We may also be found to have committed an offense.

Gifts and Hospitality

Corporate hospitality is permitted, but the following rules set out below must be strictly adhered to. If you consider a need to vary these rules for whatever reason you must first obtain prior authorization from the CCSI president or vice president.

- The gift is not made by you with the intention of influencing a third party to obtain or retain business or a business advantage, or to reward the provision or retention of business or a business advantage, or in explicit or implicit exchange for favors or benefits
- The gift must comply with local law
- It is given in the name of the corporation not in your name
- It does not include cash or a cash equivalent (such as gift certificates or vouchers)
- It is given openly, not secretly

The practice of giving business gifts varies between organizations. What may be normal and acceptable in one company may not be in another. The test applied is whether in all the circumstances the gift or hospitality is reasonable and justifiable. The intention behind the gift should always be considered and it must never be given with the intention of influencing a third party.

Corporate hospitality is acceptable, but we must be able to demonstrate that it is reasonable, undertaken in good faith, and as part of an established and important part of our business.

What is not acceptable:

It is not acceptable for you (or someone on your behalf) to:

- Give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given
- Give, promise to give, or offer, a payment, gift or hospitality to a government official, agent or representative to "facilitate" or expedite a routine procedure
- Accept payment from a third party that you know or suspect is offered with the expectation that it will obtain a business advantage for them
- Accept a gift or hospitality from a third party if you know or suspect that it is offered or provided with an expectation that a business advantage will be provided by us in return
- Threaten or retaliate against another worker who has refused to commit a bribery offense or who has raised concerns under this policy
- Engage in any activity that might lead to a breach of this policy

Kickbacks

Kickbacks are typically payments made in return for a business favor or advantage. All workers must avoid any activity that might lead to, or suggest, that a facilitation payment or kickback will be made or accepted by us.

Donations

We only make charitable donations that are legal and ethical under local laws and practices. No donation must be offered or made without the prior approval of the CFO.

How to Raise a Bribery Concern

It is important that you report it by following the procedure set out in our Whistleblowing Policy as soon as possible if you are offered a bribe by a third party, are asked to make one, suspect that this may happen in the future, or believe that you are a victim of another form of unlawful activity. A copy of our Whistleblowing Policy can be found at the Human Resources department.

If have any concerns about any issue with this policy or suspicion of bribery taking place, haven taken place, or could in the future take place, you should raise this at the earliest possible stage.

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct. We reserve our right to terminate our contractual relationship with other workers and third parties if they breach this policy.

Protection

Workers who refuse to accept or offer a bribe, or those who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. We encourage openness and will support anyone who raises genuine concerns made in good faith under this policy, even if they turn out to be mistaken. However, if concerns are not genuine or are made in bad faith, employees may be subject to CCSI's disciplinary procedure. We also reserve the right to terminate our contractual relationship with other workers if they breach this policy.

We are committed to ensuring no one suffers any detrimental treatment as a result of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion that an actual or potential bribery or other corruption offense has taken place, or may take place in the future. If you believe that you have suffered any such treatment, you should inform the president or vice president immediately.