



Anti Bribery and Corruption Policy

OVERVIEW

This policy, formerly known as Gift Acceptance Policy, provides guidelines for the giving and accepting of Benefits and other inducements to or from Third Parties.

PURPOSE

To regulate and monitor the giving and accepting of Benefits by Rex Group employees and to provide a transparent and accountable process for this.

CONTENT

- 1 Introduction
- 2 Application
- 3 Definitions
- 4 Prohibition against Bribery and Corruption
- 5 Offering of Benefits
- 6 Receipt of Benefits
- 7 Retention of Benefits
- 8 Political Contributions
- 9 Charitable Donations
- 10 Personal Contributions/Donations
- 11 Breaches of this Policy
- 12 Reporting of Bribery or Corruption
- 13 Amendments

1. Introduction

The Regional Express Group (Rex Group) is committed to conducting business in an ethical manner and in compliance with the law, including all applicable anti-bribery and anti-corruption laws and regulations in Australia.

In the course of their work, employees of the Rex Group (Employees) may offer or may be offered gifts, benefits or hospitality (Benefits). This policy will regulate the giving and acceptance of Benefits by Employees to ensure the Company upholds the highest standards of ethics and integrity.

2. Application

This policy applies to all, employees and contractors, including contracted airport agents and their staff, of Rex Group from time to time worldwide.

3. Definitions

Bribery means the offering, promising, giving, accepting or soliciting of an advantage as an inducement, directly or indirectly, to or from another person in order to influence a person's action or decision to gain or retain an improper advantage. Inducements can take the form of gifts, loans, fees, rewards or other advantages (e.g. taxes, services, donations, favours etc.).

Corruption means the abuse of entrusted power for private gain.

Giving of Benefit means the voluntary transfer of property or the giving of a benefit (including hospitality), between a Rex Group Employee and a Third Party at no charge or at a value that is disproportional to the market value of the Benefit as a consequence of an Employee's service within the Rex Group. This may include, but is not limited to, a present received in appreciation of service to a customer.

Third Party means any individual or organisation whom Employees come into contact with during the course of the employment.

4. Prohibition against Bribery and Corruption

The Rex Group strictly prohibits any Employee from engaging in Bribery or any other form of Corruption. The Rex Group takes a firm view of such matters and has zero tolerance of such actions.

5. Offering of Benefits

Employees must not engage in the Giving of Benefits:

- which could be regarded as illegal or improper; and
- where there is an intention to influence a person's inappropriate exercise of their authority.

Notwithstanding the above, all Giving of Benefits must be approved by the Management Committee.

6. Receipt of Benefits

No Rex Group employee shall seek or solicit any Benefit from external contacts. Such actions will be viewed as Corruption and represent gross misconduct.

From time to time, Employees may be given Benefits in connection with the operation of the Rex Group.

In such circumstances, Employees should declare no later than 7 days of any Benefits received to their Manager who will then refer on to the Management Committee before the acceptance of the offer.

7. Retention of Benefits

The Management Committee will decide on the appropriateness of any Benefit received by an Employee. Generally, employees will be allowed to keep Benefits which do not exceed \$200 in market value. Benefits which exceed \$200 in value shall be deemed to belong to the Company and must be surrendered to the Company through a Management Committee member.

The Employee may choose to purchase the Benefit from the company. The proceeds will be contributed to the annual Christmas party. Where the surrendered Benefit is not purchased, it will be contributed to the Christmas party or used in other ways as the Company sees fit.

The Company may also elect to return the Benefit if it is considered inappropriate.

8. Political Contributions

Rex Group makes contributions to various political parties from time to time. Such contributions are disclosed in accordance to the Australia Electoral Commission as required.

9. Charitable Donations

Rex Group is committed to giving back to the regional communities by supporting worthwhile charitable causes which are focused on helping the less fortunate. Rex Group will make charitable donations that are legal and ethical under the local laws and practices.

10. Personal Contributions/Donations

This Policy does not intend to restrict an individual's freedom to make donations or undertake volunteer work in their personal capacity. However, Employees must:

- not offer any donation on behalf of Rex Group without prior approval of the Management Committee or the Board; and
- be careful to ensure that all charitable donations and volunteer work are not used as a scheme to conceal Bribery.

11. Breaches of this Policy

The obligation to comply with this Policy rests with each Employee within the Rex Group. As breaches of this Policy could have very serious reputational and financial

repercussions on the Company, all Employees should take note that the Company takes a most serious view of this matter.

Any alleged breach will be investigated by Management Committee and any Employee found to be breaching this policy will face disciplinary action, which may include termination of employment.

12. Reporting of Bribery or Corruption

Under the Code of Conduct, all Rex Group Employees have the corporate responsibility to report any actual, potential or suspected breaches under this policy.

13. Amendments

Rex Group may amend this Policy from time to time by giving you reasonable notice. Rex Group may notify you by using one or more of the following methods:

- (a) mail;
- (b) e-mail or
- (c) notice on the Rex intranet RexLink.

You should consult this Policy regularly to ensure that your activities comply with the most recent version. Enquiries regarding this Policy may be referred to your supervisor and/or the Human Resources Department.