



VEEM LTD

ABN 51 008 944 009 A.C.N. 008 944 009



22 Baile Road
Canning Vale
Western Australia 6155

PO Box 1542
Canning Vale
Western Australia 6970

Phone : +61 8 9455 9355

Fax : +61 8 9455 9333

Email : veem@veem.com.au

Anti-Bribery and Corruption Policy

Policy Statement

It is our policy to conduct our business in an honest and ethical manner. We take a zero-tolerance approach to Bribery and Corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate and implementing and enforcing effective systems to counter bribery.

We will uphold all laws relevant to countering bribery and corruption in all the jurisdictions in which we operate. The Company's compliance with Australian and offshore laws is compulsory. This policy must be applied to dealings within the Company as well as with external parties.

Scope

This policy applies to all Employees and relevant Third Parties of the Company and shall be communicated to them at the outset of our business relationship and as appropriate thereafter.

This policy applies in all countries or territories where the Company operates. Where local customs, standards, laws or other local policies apply that are stricter than the provision of this policy, the stricter rules must be complied with. However, if this policy stipulates stricter rules than local customs, standards, laws or other local policies, the stricter provisions of this policy shall apply.

Gifts, Invitations and Hospitality

This policy does not prohibit normal, reasonable and appropriate hospitality (given and received) to or from Third Parties.

You are prohibited from accepting a gift or giving a gift to a third party in the following situations:

- it is made with the intention of influencing a Third Party to obtain or retain business, to gain a business advantage, or to reward the provision or retention of business or a business advantage, or in explicit or implicit exchange for favours or benefits;
- it is given in your name and not in the name of the Company;
- it includes cash or a cash equivalent (such as gift certificates or vouchers);
- it is of an inappropriate type and value and given at an inappropriate time (e.g. during a tender process); and
- it is given secretly and not openly.

We appreciate that the practice of giving business gifts varies between countries and regions and what may be normal and acceptable in one region may not be in another. The test to be applied is whether in all the circumstances the gift or hospitality is reasonable, justifiable and is proportionate. The intention behind the gift should always be considered.

Facilitation Payments and Kickbacks

In many jurisdictions, making Facilitation Payments is illegal. We do not make, and will not accept, Facilitation Payments or Kickbacks of any kind anywhere in the world.

Where the facilitation payment is being extorted or you are being coerced to pay it and your safety or liberty is under threat or you feel you have no alternative but to pay for personal or family peace of mind, then pay the Facilitation Payment and report this to your line manager as soon as possible.



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Your Responsibilities

The prevention, detection and reporting of any form of Bribery & Corruption are the responsibility of all Employees.

You must notify the Company Secretary as soon as possible if you are offered a bribe, 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.

All Employees have the responsibility to read, understand and comply with this policy. You should at all times, avoid any activity that might lead to, or suggest, a breach of this policy.

Any Employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct. This policy should be read in conjunction with the Company's Corporate Code of Conduct.

Protection

Employees who refuse to take part in bribery or corruption, or report in good faith under this policy, their suspicion that an actual or potential bribery or other corruption offence has taken place or may take place in the future will be protected from detrimental treatment/retaliation. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.

Governance

The board of directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

The Company Secretary has primary and day-to-day responsibility for implementing this policy and for monitoring its use and effectiveness. Management at all levels are responsible for ensuring those reporting to them are made aware of and understand this policy and are given adequate and regular training on it.

Monitoring and Review

The Board (or Audit and Risk Committee if applicable) will monitor the effectiveness and review the implementation of this policy, regularly considering its suitability, adequacy and effectiveness. Any improvements identified will be made as soon as possible.

Internal control systems and procedures will be subject to regular audits to provide assurance that they are effective. The Company Secretary will report to the Board (or Audit and Risk Committee if applicable) at least annually on the application of this policy.

M D MIOCEVICH
MANAGING DIRECTOR

Date 11/5/2021