



ANTI-CORRUPTION POLICY

Custodian: Certification Consultant

Authorised by: Certification Consultant

GPFL is committed to the highest standards of fair, ethical and legal conduct in all aspects of business. GPFL strictly prohibits any form of bribery or corruption in any of its business dealings.

In particular, GPFL will take particular care in the following situations to ensure there is no bribery or corruption when:

- Dealing with public officials;
- Providing or accepting travel, gifts and entertainment;
- Providing sponsorships, charitable contributions and community investments;
- Making political contributions;
- In considering business partners; and
- In selecting contractors and service providers.

To ensure that there is no bribery or corruption, GPFL will not offer or accept any travel, gifts or entertainment, will not offer or accept any favour from public officials or politicians/political parties, will not expect any favourable treatment if providing sponsorship, making charitable contributions or community investments and will undertake risk assessments of their business partners, contractors and service providers.


Australia has strong Anti-Corruption and Bribery laws. These are contained in the *Criminal Code Act 1995* (Commonwealth) and the *Corporations Act 2001* (Commonwealth). The *Criminal Code Act 1995* prohibits both domestic and foreign bribery, making it an offence to:

- Provide, offer or promise to provide a benefit to another person with the intention of influencing a foreign public official in their official duties to obtain or retain business or a business advantage.
- Provide, offer or promise to provide a benefit to another person that is not legitimately due to that person, with the intention of influencing the exercise of a public duty or function in Australia.

The *Corporations Act 2001* also imposes liability on companies for bribery and corruption offences committed by their employees, agents or officers, unless the company can prove it had adequate procedures in place to prevent the conduct.

Failure to comply with this Policy may lead to a breach of the applicable legislation and result in prosecution. Breaches or suspected breaches of this Policy must be reported to the Director in charge of the GPFL business and fully investigated using an external party experienced in anti-corruption and bribery investigations to ensure independence in the investigation.

All GPFL staff are made aware of these requirements upon employment.

Signed: 
Name: JUN KITAMURA
Organisation Name: GPFL

Date: 7 Mar 2025
Position: Director
Location: Portland VIC

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