



ANTI-BRIBERY AND CORRUPTION POLICY

1. Purpose and scope

Clean Seas Seafood Limited (“Clean Seas Seafood” or the “Company”) will not tolerate wilful acts of bribery and corruption in its operations and activities since such acts are legally, morally and ethically wrong. Bribery and corruption are criminal offences and such acts by the Company, its subsidiaries, its directors, officials, employees, contractors and other representatives could generate the risk of legal action possibly resulting in fines and/or imprisonment.

1.1 The purpose of this policy is to:

- (a) set out Clean Seas Seafood’s responsibilities, and the responsibilities of those working for us or on our behalf, in observing and upholding our position on bribery and corruption; and
- (b) provide information and guidance to those working for us on how to recognise and deal with instances of bribery and corruption.

2. Scope & Application

2.1 This policy applies to:

- (a) all employees working at all levels and grades within Clean Seas Seafood including senior managers, officers, directors, trainees, interns and casual workers (whether permanent, fixed-term or temporary), wherever located (collectively referred to as “**employees**” in this policy); and
- (b) all consultants, contractors, seconded staff and agency staff, volunteers, agents, sponsors, or any other person associated with Clean Seas Seafood, wherever located and who is not an employee (collectively referred to as “**representatives**” in this policy).

2.2 This policy covers:

- (a) Bribes;
- (b) Gifts and hospitality;
- (c) Facilitation payments;
- (d) Political contributions;
- (e) Charitable contributions;

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- (f) Sponsorships;
- (g) Record-keeping and internal controls;
- (h) How to raise a concern;
- (i) What to do if you are a victim of bribery or corruption;
- (j) Protection; and
- (k) Monitoring and Review.

2.3 In the event of any inconsistency between this policy and any other document (including any work instruction, standard operating procedure or form), the terms of this policy prevail.

3. Associated Documents

3.1 These include but are not limited to the following documents:

- (a) AS 8001_2008 Fraud and Corruption Control
- (b) Australian Taxation Office (ATO) guidelines for understanding and dealing with the bribery of Australian and foreign public officials
- (c) Criminal Code Act 1995 (Commonwealth of Australia)
- (d) Criminal Code Amendment (Bribery of Foreign Public Officials) Act 1999
- (e) OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions
- (f) Transparency International – Business Principles in Countering Bribery
- (g) UK Bribery Act 2010
- (h) United Nations Convention against Corruption
- (i) United States Foreign Corrupt Practices Act (FCPA)

4. Definitions / Abbreviations

Bribe A bribe is any advantage or benefit (including a financial advantage or benefit) (“a **Benefit**”) offered, promised or provided by a person (“the **Offeror**”) to another person that is not legitimately due to that person, and in circumstances where the Offeror:

- (a) intends the Benefit to influence a person in order to obtain or retain business, or in order to obtain or retain an advantage that is not legitimately due to the recipient, or intended recipient of the advantage (which may be the Offeror or another person); or
- (b) intends the Benefit to induce a person to improperly perform a function or activity, or to reward a person for such improper performance.

Improper performance includes where a person fails to act:

- (a) in good faith;
- (b) impartially; or

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(c) in accordance with a position of trust.

A Benefit can include anything of any value, and may include a Gift, Employment, Entertainment or Hospitality.

Under the laws of some jurisdictions (such as the UK), a Bribe may include a Facilitation Payment.

Board	The board of Clean Seas Seafood Limited.
Bribery	Bribery includes the direct or indirect (for example, via a third party or intermediary) offering, promising, giving, accepting, requesting or soliciting of a Bribe, or the authorisation or causing of the offering, promising, giving, accepting, requesting or soliciting of a Bribe.
Company Secretary	The company secretary of Clean Seas Seafood Limited.
Corruption	Corruption includes the abuse of public or private office or other position of trust (including the performance of an act or a failure to perform an act) for personal gain or advantage, or for the personal gain or advantage of another person or entity.
Employment	Employment means an offer of employment to, or actual, employment of, any person.
Entertainment	Entertainment includes an invitation or tickets to sporting, social, cultural, or musical events.
Gift	A gift includes a benefit of any value and of any kind, including but not limited to money, vouchers, goods, services or other non-financial benefits provided as a mark of appreciation or friendship. A gift can be Entertainment, but does not, for the purpose of this policy, include Hospitality.
Hospitality	Hospitality means the provision of food and beverages but does not include Entertainment.
Clean Seas Seafood	Includes Clean Seas Seafood Limited and all its subsidiary companies.
Third Party	Includes contacts, agents, advisers, and government and public bodies, including their advisers, representatives and officials, politicians and political parties.
we”, “our” and “us”	Clean Seas Seafood.

5. Responsibilities

- 5.1 All employees and representatives are required to ensure that they read, understand and comply with this policy.
- 5.2 The prevention, detection and reporting of Bribery and other forms of Corruption are the responsibility of all those working for us or under our control. All employees and representatives are

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required to avoid any activity that might lead to, or suggest, a breach of this policy.

- 5.3 Employees and representatives must notify their manager or the Company Secretary as soon as possible if they believe or suspect that a conflict with or breach of this policy has occurred or may occur in the future.
- 5.4 Employees and representatives must cooperate with Clean Seas Seafood in any investigation into suspected Bribery, Corruption or other unethical conduct (such as fraud), including by participating in interviews if requested to by Clean Seas Seafood.
- 5.5 Any employee who breaches this policy may face disciplinary action, which could result in termination of employment. Any representative who breaches this policy may face termination of their contract and Clean Seas Seafood may bar them from providing goods and services to Clean Seas Seafood. In addition, breach of this policy may also expose an individual to criminal and civil liability and could result in imprisonment and/or in the imposition of a significant financial penalty.
- 5.6 We reserve our right to terminate our contractual relationship with others if they breach this policy.
- 5.7 The Board has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and to use all reasonable endeavours to ensure that all those under our control comply with it.
- 5.8 The Chief Executive Officer has primary and day-to-day responsibility for implementing this policy, including through the development of a formal, documented program, and for monitoring its use and effectiveness and dealing with any queries on its interpretation.
- 5.9 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 Clean Seas Seafood's anti-bribery and anti-corruption expectations and processes.

6. Training

- 6.1 Training on this policy forms part of the induction process for all new employees. All existing employees will receive regular, relevant training on how to implement and adhere to this policy.
- 6.2 Our zero-tolerance approach to Bribery and Corruption must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and as appropriate thereafter.
- 6.3 Suppliers, contractors and business partners are expected to use their best endeavours to educate their employees in anti-bribery and anti-corruption matters.
- 6.4 The requirement for the commitment of our suppliers, contractors and business partners to the Clean Seas Seafood approach on anti-bribery and anti-corruption will be communicated through mechanisms including the Clean Seas Seafood internet site and may also involve its inclusion in contracts and supplier and distributor agreements.

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7. Policy

- 7.1 Clean Seas Seafood wishes to maintain and build a reputation for integrity, which results from the actions of employees and representatives in their dealings both within and outside the Company. It is our policy to conduct all of our business dealings in an honest and ethical manner. As such, we take a zero-tolerance approach to Bribery and Corruption. We are committed to acting professionally and fairly 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 Clean Seas Seafood operates, including using all reasonable endeavours to do so through our distributors and other Third-Party agents.
- 7.2 Specifically, as an Australian-headquartered company, Clean Seas Seafood acknowledges its obligations concerning the bribing of foreign public officials under the *Criminal Code Act 1995* (incorporating the *Criminal Code Amendment (Bribery of Foreign Public Officials) Act 1999*), as well as the two major international conventions on combatting bribery to which Australia is a party, namely the *OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions* and the *United Nations Convention against Corruption*. Clean Seas Seafood also recognises its obligations under the *US Foreign Corrupt Practices Act 1977* as well as other anti-bribery and anti-corruption legislation applicable in the other jurisdictions in which we operate.

8. Prohibition on Bribery

- 8.1 Clean Seas Seafood employees and representatives must not give, offer, promise, accept or request a Bribe and must not authorise or cause a Bribe to be given, offered, promised or accepted by another person, either directly or through any third party (such as an intermediary, agent or distributor).
- 8.2 Specifically, employees and representatives must not:
- (a) bribe a Foreign Public Official anywhere in the world; or
 - (b) authorise or cause a Foreign Public Official anywhere in the world to be bribed.
- 8.3 In addition, Clean Seas Seafood employees and representatives are prohibited from soliciting, arranging or accepting bribes intended for the benefit of the employee's or representative's family, friends, associates or acquaintances.
- 8.4 Under no circumstances will Clean Seas Seafood approve of any bribes, or make, request or receive an irregular benefit, payment or other thing of any value, to win business or influence a business decision in Clean Seas Seafood's favour.
- 8.5 As bribery can take many forms, it is important that Clean Seas Seafood employees and representatives understand where risks may arise and what is expected of them.

9. Gifts and Hospitality

- 9.1 Clean Seas Seafood employees, representatives and third parties operating on behalf of Clean Seas Seafood, must not offer or give (or authorise or cause to be offered or given) any gift or Hospitality that is not permitted to be given to a person in accordance with the requirements of local legislation

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and applicable industry code(s) of conduct / ethics to which Clean Seas Seafood subscribes (whether as a member or not). (These codes are referenced in Section 3 – Associated Documents).

- 9.2 Notwithstanding clause 9.1, Clean Seas Seafood employees, representatives and third parties operating on behalf of Clean Seas Seafood, must not offer or give (or authorise or cause to be offered or given) any gift, hospitality or employment, or make (or authorise or cause to be made) any payment to a government or non-government official or representative, politician or political party, employee, customer, or other person or entity:
- (a) which is, or could be, regarded as a bribe, or otherwise as illegal or improper;
 - (b) where the gift is cash, a cash equivalent (e.g. gift cards, savings bonds, etc.), or any other item that is of, or could be regarded as, lavish or extravagant nature (to be assessed having regard to all relevant factors and circumstances, including the relative value of the item in the relevant country); or
 - (c) where there is any suggestion that a return favour will be expected or implied.
- 9.3 In all instances, where a gift is **given** that gift must be appropriately recorded by the employee or representatives completing a Gift Disclosure Report in the form of **Appendix 1**, which the employee or representatives must provide to the Company Secretary.
- 9.4 In relation to gifts and hospitality, Clean Seas Seafood shall maintain a register of:
- (a) relevant local legislation; and
 - (b) the applicable industry code(s) of conduct / ethics to which Clean Seas Seafood subscribes whether as a member or not).
- 9.5 Clean Seas Seafood is committed to ensuring that employees, representatives and third parties are trained in those Country and region-specific requirements as identified in 9.3, in addition to other training as may be required by this Policy.
- 9.6 Clean Seas Seafood employees, representatives and third parties operating on behalf of Clean Seas Seafood, may not accept or request (or authorise or cause the acceptance or request) any Gift or Hospitality from suppliers, customers or anyone looking to do business with the company:
- (a) which is, or could be, regarded as a bribe, or otherwise as illegal or improper; or
 - (b) where the gift is cash, a cash equivalent (for example, gift cards, savings bonds, etc.), or any other item that is, or could be regarded as, lavish or extravagant in nature (to be assessed having regard to all relevant factors and circumstances, including the relative value of the item in the relevant country);
 - (c) where there is any suggestion that a return favour will be expected or implied; or
 - (d) that is not permitted in accordance with the requirements of local legislation and applicable industry code(s) of conduct / ethics to which Clean Seas Seafood subscribes (whether as a member or not). (These codes are referenced in Section 3 – Associated Documents).

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- 9.7 If it is not appropriate or reasonable to decline the offer of a gift, the gift may be accepted, provided it is then declared to the employee's or representative's manager or the Company Secretary. A decision in respect of the gift will then be made by the manager subject to the approval of the Company Secretary. Where possible, the gift should be donated to charity or otherwise shared between employees and representatives at a site.
- 9.8 In all instances, where a gift is **received** (or offered and refused) that gift must be appropriately recorded by the employee or the representative completing a Gift Disclosure Report in the form of **Appendix 1**, which the employee or representative must provide to the Company Secretary.
- 9.9 The Company Secretary will maintain records of gifts given and received by completion and maintenance of a Register of Gifts in the form of **Appendix 2**, as well as being publicly disclosed (when required by law).
- 9.10 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 and justifiable. The intention behind the gift should always be considered.
- 9.11 Within the parameters prescribed by this Policy, the Board may define specific guidelines and processes to reflect local professional and industry standards, including with reference to regional and country-specific legislation and codes of conduct.

10. Dealing with and Through Third Parties

- 10.1 Clean Seas Seafood could be liable for the acts of Third Parties that act on our behalf. These Third Parties may include agents, distributors, intermediaries, suppliers and/or purchasers or other contractors. As such we are committed to promoting compliance with effective anti-bribery and anti-corruption policies by all third parties acting on behalf of Clean Seas Seafood.
- 10.2 It is important that any Clean Seas Seafood company proposing to engage a Third Party to act for or on behalf of Clean Seas Seafood implement appropriate controls to ensure that the actions of the Third Party will not adversely affect Clean Seas Seafood.
- 10.3 Clean Seas Seafood employees and representatives must not engage any Third Party whom they know or reasonably suspect of engaging in Bribery or Corruption.
- 10.4 Third Parties that pose particular risk to Clean Seas Seafood of breaching anti-bribery laws include those that operate in developing or emerging economies or are involved in negotiating any business arrangements or transactions with the public or private sector on behalf of Clean Seas Seafood in any country (including bidding for tenders, negotiating supply contracts, arranging leases or licences or providing transportation or customs clearance services).
- 10.5 The Company Secretary will also be responsible for determining the categories of Third Parties engaged with by the Company, and which of the following controls should apply to those categories

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of third parties:

- (a) the communication of the standards of conduct set out in this policy to the Third Party.
 - (b) due diligence to ensure that it is appropriate for the Third Party to represent Clean Seas Seafood. This includes completion of a documented due diligence assessment. If any issues of concern or 'red flags' are identified by this due diligence, the Company Secretary must be informed immediately and prior to the engagement of the third party. Due diligencemay include, but is not limited to:
 - i. ensuring that there is a real commercial justification for the engagement of theThird Party;
 - ii. obtaining references;
 - iii. obtaining information in respect of owners, partners and principals; and
 - iv. obtaining information/exploring any links between a Third Party and people ingovernment positions.
 - v. incorporation of standard terms in the contractual arrangements with the third party that incorporate the issues addressed by this policy.
 - vi. maintaining oversight of the work of the Third Party by the relevant Clean Seas Seafood personnel.
- 10.6 Commissions paid to distributors (if any) must be justifiable remuneration for legitimate services rendered and in line with industry standards in the region in which the distributor operates.
- 10.7 The distributor agreements will be transparent in the commissions paid and retail prices charged to the customer.
- 10.8 Distributor agreements will provide authority for Clean Seas Seafood to audit the selling price of the productand any Third-Party agreements with agents or other intermediaries.

11. Facilitation Payments

- 11.1 Facilitation Payments tend to be demanded by low level officials to obtain a level of service towhich Clean Seas Seafood would normally be entitled.
- 11.2 Our strict policy is that Facilitation Payments must not be paid. We recognise, however, that our employees or representatives may be faced with situations where there is a risk to the personal safety or security ("life, limb or liberty") of an employee, representative or his/her familyand where a Facilitation Payment may be unavoidable, in which case the following steps mustbe taken by the person making the Facilitation Payment:
- (a) Keep the value of any payment or benefit to the minimum;
 - (b) Create a record concerning the benefit or payment; and
 - (c) Report it to the employee's or representative's line manager.

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- 11.3 The record of the payment must include the following information:
- (a) the value of the benefit concerned;
 - (b) the date on which the conduct occurred;
 - (c) the identity of the recipient of the benefit;
 - (d) particulars of the routine service or action that was sought to be expedited or secured; and
 - (e) the signature of the person that made the payment, or other means of verifying that person's identity.
- 11.4 Included in **Appendix 3** is a Facilitation Payment Report Form that may be used by employees and representatives to report a Facilitation Payment to the Company Secretary.
- 11.5 In order to achieve our aim of not making any Facilitation Payments, each business of the Company will keep a record of all such payments made in the above-mentioned circumstances, which must be reported as soon as possible to the Company Secretary, in order to evaluate the business risk and to develop a strategy to minimise such payments in the future. Records of facilitation payments must be retained for at least 7 years.

12. Political Contributions

- 12.1 We do not make donations, whether in cash or kind, in support of any political parties or candidates, as this can be perceived as an attempt to gain an improper business advantage.

13. Charitable Contributions

- 13.1 Charitable support and donations are acceptable (and indeed are encouraged), whether of in-kind services, knowledge, time, or direct financial contributions. However, employees and representatives must be careful to ensure that charitable contributions are not used as a scheme to conceal bribery. 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 Managing Director of Clean Seas Seafood or a regional head.
- 13.2 Within the parameters prescribed by this policy, Clean Seas Seafood may define specific guidelines and processes for charitable contributions to reflect local professional and industry standards, including with reference to regional and country-specific legislation and codes of conduct.

14. Sponsorship

- 14.1 Sponsorships must not be used to disguise corrupt payments or Bribery. Before any sponsorship is engaged in, due diligence must be undertaken to ensure that the proposed sponsorship is not a means of disguising corrupt payments or Bribery. Due diligence may include, without limitation, the matters set in clause 10.

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15. Mergers, Acquisitions and Joint Ventures

- 15.1 Clean Seas Seafood acknowledges the risks of Bribery and Corruption involved in mergers, acquisitions and joint ventures with other entities.
- 15.2 These risks relate to the other entity not having a program for the management of risks of Bribery and Corruption and a culture of compliance consistent with those of Clean Seas Seafood.
- 15.3 Before entering into any agreement for merger, acquisition or joint venture with another entity Clean Seas Seafood will undertake sufficient integrity due diligence to ensure:
- (a) it has adequately assessed the risk of the entity's non-compliance with anti-bribery legislation; and
 - (b) the entity has an anti-bribery and anti-corruption program consistent with that of Clean Seas Seafood or is willing to comply with the Clean Seas Seafood anti-bribery and anti-corruption program.

16. Record-Keeping

- 16.1 We must keep accurate financial records and have appropriate internal controls in place which will evidence the business reason for making payments to Third Parties.
- 16.2 Employees and representatives must declare and keep an accurate written record of all hospitality or gifts accepted or offered, as well as entering details in the appropriate register, which will be subject to managerial review.
- 16.3 Employees and representatives must also ensure all expenses claims relating to Hospitality, Gifts or expenses incurred by third parties are submitted in accordance with our expenses policies and processes and specifically record the reason for the expenditure accurately.
- 16.4 All accounts, invoices, memoranda and other documents and records relating to dealings with Third Parties, such as clients, suppliers and business contacts, should be prepared and maintained with strict accuracy and completeness. No accounts shall be kept "off-book" to facilitate, conceal or disguise the giving or receiving of any benefit, including any financial payment.
- 16.5 No record or document (including electronic records or documents) may be made, altered destroyed or concealed for the purpose of facilitating, concealing or disguising the giving or receiving of any benefit, including any financial payment.
- 16.6 Records or documents include hard copy and electronic copies of:
- (a) any account;
 - (b) any record or document made or required for any accounting purpose;
 - (c) any register under the *Corporations Act 2001* (Cth) (Australia); or

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- (d) any financial report or financial records, including:
- (e) invoices, receipts, orders for the payment of money, bills of exchange, cheques, promissory notes and vouchers:
 - (i) documents of prime entry; and
 - (ii) working papers and other documents needed to explain the methods by which financial statements are made up and adjustments to be made in preparing financial statements.

17. Internal Controls

17.1 Clean Seas Seafood will establish and maintain effective systems of internal controls to assist counter Bribery and Corruption, comprising financial and organisational checks and balances over Clean Seas Seafood's accounting and record keeping practices and other business processes.

18. How to Raise a Concern

18.1 Employees and representatives are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. If unsure whether a particular act constitutes Bribery or Corruption, or if there are any other queries or concerns, these should be raised with the employee's or representative's line manager in the first instance.

18.2 However, if, for whatever reason this is not practical, concerns can be raised to the Company Secretary.

18.3 Refer to the Clean Seas Seafood Whistleblower Policy for further information.

19. What to do if You are a Victim of Bribery or Corruption

19.1 It is important that employees and representatives tell their manager or the Company Secretary as soon as possible if they are offered a Bribe by a Third Party, are asked to make one, suspect that this may happen in the future, or believe that they are a victim of another form of unlawful activity.

19.2 In order to provide an accurate record of the event, employees and representatives should document the conversation and circumstances as soon as possible after the occurrence of the event.

20. Protection

20.1 Employees and representatives 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 aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

20.2 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

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or potential Bribery or other Corruption offence has taken place or may take place in the future.

- 20.3 Detrimental treatment includes actual or threatened dismissal, disciplinary action, or other unfavourable treatment connected with raising a concern in compliance with this policy.
- 20.4 If an employee or representatives believes that they have suffered any such treatment, they should inform the Company Secretary immediately.

21. Monitoring and Review

- 21.1 The Company Secretary 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 required by this policy will be subject to regular audits to provide assurance that they are effective in countering Bribery and Corruption.
- 21.2 All employees and representatives are responsible for the success of this policy and should ensure they use it to disclose any suspected danger or wrongdoing. Employees and representatives are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to the Company Secretary.

22. Adoption and Amendment

- 22.1 This Policy was approved by the Clean Seas Seafood Board in September 2021.
- 22.2 This Policy may be amended from time to time by resolution of the Board.

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Appendix 1

Clean Seas Seafood: Gift / benefit / facilitation payment disclosure form Confidential	
PART A – To be completed by recipient of gift or benefit	
Offered to	
[Include name, position and contact details]	
Date of offer	
[Include the date that the gift or benefit was offered]	
Offered by	
[Include the name, position, organisation and contact details for the person that made the offer of the gift or benefit. The details of the individual should be included, not simply the details of the relevant organisation]	
Reason for offer	
[Include details of the reason that the offer was made]	
Description of gift or benefit	
[Include a detailed description of the gift or benefit]	
Known or estimated value of the gift or benefit	
[Include the known or estimated value of the gift or benefit. If the value cannot be estimated, attribute a value based upon a reasonable person test. That is, what value would the reasonable person place upon the gift or benefit]	
Any other relevant facts or circumstances	
[Include details of any other relevant facts or circumstances regarding the offer of the gift or benefit]	
PART B – To be completed by Company Secretary	
Decision regarding gift or benefit	
[Record details of the decision made regarding the gift or benefit]	
Signature	
[This is the sign-off by the Company Secretary]	

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