



## Anti-bribery and Corruption Policy

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Bellamy's Australia Limited

ACN 124 272 208

# Part A – Scope and application

## 1 Purpose of this Policy

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Bellamy's Australia Limited (**Bellamy's**) is committed to a high level of integrity and ethical standards in all business practices, and has zero tolerance for bribery and corruption. In accordance with these commitments, and to support the above behaviours, Bellamy's has developed this Policy for countering bribery and corruption.

## 2 Who this Policy applies to

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This Policy applies to:

- Bellamy's and all subsidiary and affiliate entities over which it exercises control;
- All directors, officers and employees of Bellamy's (which for these purposes includes temporary or contract staff);
- All Business Partners, subject to the provisions in the table below.

Every person covered by this Policy is responsible for counter bribery and corruption by adhering to this Policy and must accept responsibility for familiarising themselves and complying with this Policy.

Some persons have additional responsibilities relating to this Policy (see below).

Position	Responsibility
<b>Board</b>	The Board of Directors is committed to supporting this Policy.
<b>General Counsel</b>	The General Counsel, Company Secretary and Regulatory Affairs ( <b>General Counsel</b> ) is responsible for establishing and implementing this Policy.
<b>Employees</b>	It is each employee's responsibility to: <ul style="list-style-type: none"><li>• comply with this Policy; and</li><li>• raise any concerns or issues with the General Counsel.</li></ul>
<b>Manager</b>	It is a Manager's responsibility to: <ul style="list-style-type: none"><li>• communicate this Policy to all employees reporting to them;</li><li>• ensure that all employees reporting to them, and Business Partners within their area of responsibility, understand and comply with this Policy; and</li><li>• take immediate action where a Manager becomes aware of a potential breach of this Policy.</li></ul>
<b>Business Partners</b>	Business partners are any person or entity which acts for or on behalf of or performs services for Bellamy's, including third party agents, consultants, distributors or service providers (collectively, <b>Business Partners</b> ).

### 3 What this Policy applies to

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This Policy applies to all Bellamy's business and transactions, regardless of where they occur and whether or not any particular conduct may be regarded as common or customary in a particular place or location.

### 4 Anti-bribery and Corruption Procedure

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Bellamy's has developed an *Anti-bribery and Corruption Procedure* to support this Policy and to ensure that anti-corruption laws are not breached and Bellamy's reputation is not damaged. This Procedure is contained in Bellamy's Employment Handbook.

Employees must comply with the *Anti-bribery and Corruption Procedure* when undertaking any of the following activities on behalf of Bellamy's:

- offering or accepting gifts and benefits;
- procuring goods and services;
- engaging and monitoring Business Partners;
- commencing activities in new countries or entering into new business ventures; and
- making political, charitable or community donations or sponsorships.

### 5 Training on this Policy

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Bellamy's will ensure that all employees (including new employees) and applicable Business Partners are informed about this Policy.

### 6 Who to speak to if you have questions

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Any questions in relation to this Policy should be directed to Bellamy's General Counsel.

If you have any doubt about whether particular conduct may violate this Policy, you are encouraged to discuss the issue with your Manager or Bellamy's General Counsel for guidance.

## Part B – Your obligations

### 7 What conduct is prohibited

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All directors, officers, employees and Business Partners of Bellamy's must not:

- pay, offer, promise or accept, directly or indirectly, any bribe, kickback, secret commission or other form of improper payment (however small) in order to obtain any improper business or other advantage for Bellamy's, for themselves, or for others (see section 7.1 below);

- make facilitation payments. Facilitation payments are payments made with the purpose of expediting or facilitating the performance by a public official of a routine governmental action;
- provide or accept gifts or benefits which are contrary to the Gifts and Benefits section of Bellamy's *Anti-Bribery and Corruption Procedure*;
- make political, charitable or community donations or sponsorships which are contrary to the Donations and Sponsorships section of Bellamy's *Anti-Bribery and Corruption Procedure*;
- engage or make a payment to a Business Partner knowing the Business Partner may use or offer all or a portion of the payment directly or indirectly as a bribe, kickback, secret commission or other form of improper payment;
- falsify or mis-describe any book, record or account relating to Bellamy's business; or
- cause or authorise any of the above conduct or any other conduct which is inconsistent with this Policy.

## 7.1 What bribery is

Under the law, bribes and bribery have a very wide definition.

Bribery involves improperly offering or providing a benefit or something of value, either to a public official or someone in business, in order to obtain or retain business or an advantage or to induce or reward improper conduct or an improper decision.

While a bribe may involve a monetary payment or offer, it covers anything of value such as:

- cash or cash equivalents;
- some gifts, hospitality, entertainment or travel;
- donations or scholarships;
- the provision of favours; or
- anything else that is of significant value to the recipient.

## 7.2 Exception

Employees will **not** be penalised for providing a payment or benefit in circumstances where they fear imminent physical injury to themselves or another person if the payment or benefit is not provided.

If any payment or benefit is provided in these circumstances, you must:

- immediately report it to Bellamy's General Counsel; and
- promptly record it (including the amount of the payment or identification of the benefit provided, the identity of the person to whom it was made and the circumstances in which it was made).

## 8 What to do if you suspect this Policy has been breached

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If you become aware of any of any actual or suspected breach of this Policy, of the *Anti-bribery and Corruption Procedure*, or any request or demand for any undue financial or other advantage, you must report this to the General Counsel.

Bellamy's has developed a Speak Up Policy to provide guidance on how to make a report and how that report will be received and investigated.

Processes are in place to ensure that reports are logged, investigated and appropriate action is taken. Measures are in place to ensure complaints are treated confidentially to the extent possible, and consistent with legislative protections.

Bellamy's will not permit retaliation of any kind against any employee who has reasonable grounds to suspect a violation of this Policy. Any actual or attempted retaliation is also a breach of this Policy.

## 9 Consequences of breaching this Policy

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Bellamy's has zero tolerance for conduct in violation of this Policy. Failure to comply with this Policy may lead to disciplinary action, up to and including dismissal. Conduct in violation of this Policy may also breach applicable anti-corruption laws and result in criminal or civil penalties, including fines and imprisonment.

Employees and Business Partners must cooperate fully and openly with any investigation by Bellamy's into alleged or suspected corrupt activity or breach of this Policy. Failure to cooperate or to provide truthful information is a breach of this Policy.