ANTI-CORRUPTION & BRIBERY POLICY

Purpose

At Giltrap Agrizone, we do business honestly, fairly, and ethically. We do not tolerate bribery, corruption, or any other dishonest business practices.

This policy supports our obligations under New Zealand law, including the Crimes Act 1961, Secret Commissions Act 1910, and any other anti-corruption laws that apply where we operate.

What is Corruption?

Corruption occurs when someone uses their position for personal gain or to improperly influence a business decision.

Examples include:

- Offering or accepting bribes
- Kickbacks or secret commissions
- Undisclosed conflicts of interest
- Fraud or dishonest conduct
- Facilitation payments or unofficial payments made to speed up services

Corruption is illegal and has no place at Giltrap Agrizone.

Who Does This Policy Apply To?

This policy applies to:

- Employees
- Suppliers & Business Partners
- Anyone acting on behalf of GAZ
- Contractors and Consultants
- Managers and Directors

What We Expect

Everyone working with or for Giltrap Agrizone must:

- Never offer, request, give, or accept a bribe or improper payment
- Avoid conflicts of interest and declare any personal interests that could affect business decisions
- Deal honestly and fairly with customers, suppliers, and colleagues
- Keep accurate records of business transactions, expenses, gifts, and hospitality
- Report any suspected breaches of this policy
- Facilitation payments or unofficial payments must not be made unless there is an immediate threat to a person's health or safety

Gifts & Hospitality

Reasonable business hospitality is acceptable where it:

- Is modest and infrequent
- Is not intended to influence a business decision
- Complies with the law and company requirements
- Would not cause concern if disclosed publicly

If you are unsure whether a gift or hospitality is appropriate, discuss it with your manager or HR before accepting or offering it.

Reporting Concerns

If you see something that does not seem right, are asked to make an improper payment, or suspect bribery or corruption, report it immediately to your Manager or HR.

Concerns raised in good faith will be treated seriously and employees will not be disadvantaged for reporting genuine concerns.

Breaches of this Policy

Breaches of this policy may result in:

- Disciplinary action, up to and including dismissal
- Termination of supplier, contractor, or business relationships
- Referral to relevant authorities where required

Our Commitment

Giltrap Agrizone is committed to:

- Operating honestly and ethically
- Maintaining a zero-tolerance approach to bribery and corruption
- Providing appropriate training and guidance
- Conducting due diligence on suppliers and business partners where appropriate
- Investigating and acting on reported concerns

Review

This policy will be reviewed every two years or sooner if legislative or operational changes require amendment.

Policy Approval

Owner: Human Resources

Approved By: Managing Director

Effective Date: Nov 2026

Next Review Date: Nov 2028