

Anti-Bribery and Corruption Policy

1. Purpose

Straker Limited (**Straker** or **we**) is committed to doing business honestly, fairly and in compliance with all applicable laws. This policy sets out our zero-tolerance approach to bribery and corruption and provides guidance on recognising, avoiding and reporting such conduct.

2. Scope

This policy applies to:

- All employees (permanent, fixed-term, temporary)
- Directors and officers
- Contractors, consultants, secondees and representatives
- Subsidiaries, joint ventures and any third parties acting on our behalf (“Relevant Persons”)

3. Our Commitment

We will:

- Conduct all business honestly, ethically and transparently
- Not offer, give, request or accept bribes of any kind
- Avoid any activity that could be seen as seeking an improper advantage
- Support only legal and ethical charitable donations and sponsorships
- Never make political donations
- Not condone facilitation payments

We expect the same standards from everyone we work with.

4. Key Definitions

Bribery – Offering, giving, receiving or requesting anything of value to influence a decision or secure an improper advantage.

Anything of Value – Includes cash, gifts, meals, travel, services, credits, hospitality or other tangible or intangible benefits.

Government Official – Any person acting in an official capacity for a government, government-owned entity, political party or public international organisation.

Facilitation Payment – A small, unofficial payment to speed up a routine government action.

5. Rules to Follow

5.1 Bribery and Improper Payments

- Never give, offer, request or accept a bribe, directly or indirectly
- Do not use third parties to do what you cannot do yourself

5.2 Gifts and Hospitality

- This section applies to both giving and receiving gifts or hospitality
- Must be modest, reasonable, infrequent, and for a genuine business purpose
- Must not be in cash or cash equivalents (e.g., gift cards)
- Must not create the appearance of influencing a decision
- Any individual gift over NZ\$200 or hospitality event over NZ\$500 requires written approval from your department manager
- The total value of gifts or hospitality from the same source must not exceed NZ\$2,000 in any financial year unless pre-approved in writing by the CEO or CFO for legitimate business purposes (e.g., client entertainment, sponsorship events, conferences).
- All gifts over NZ\$800 and all hospitality over NZ\$1,500, or which could be perceived as creating an obligation, must be recorded in the Gifts & Hospitality Register
- Examples of acceptable gifts or hospitality include modest business lunches, low-value promotional items, or cultural gifts of NZ\$200 or less. Prohibited items include cash or cash equivalents, lavish entertainment unrelated to business, or any gift given with the intention to influence a decision

5.3 Facilitation Payments

- Prohibited, except in cases of immediate threat to health, safety or security
- Any facilitation payment made under a health, safety, or security exception must be reported to the Company Secretary and must also be notified to the CEO and reported to the Board at the next meeting

5.4 Political and Charitable Contributions

- No political donations in cash or kind
- Charitable contributions only with CEO approval, must be lawful and transparent

6. Spotting Red Flags

Be alert to situations such as:

- Requests for payments to personal or offshore accounts

- Unusually high commissions or fees
- Vague service descriptions or shell companies
- Pressure for urgent or cash payments
- Requests linked to influencing a decision
- Lavish hospitality or gifts without a clear and legitimate business purpose

7. Record Keeping

- Keep accurate and complete records of all payments, gifts and hospitality
- No “off-book” accounts
- Expenses claims must include the reason for the expenditure

8. Reporting Concerns

If you see or suspect bribery or corruption:

- Report to your manager or the Company Secretary
- You may report anonymously.
- Matters involving senior executives, directors, or the Company Secretary should be reported directly to the Chair of the Board or the Chair of the Audit & Risk Committee to ensure independence
- We will protect anyone who raises concerns in good faith from retaliation
- Reports made under this policy will also be protected under our Whistleblower Policy, which provides further details on confidentiality, protection from retaliation, and investigation processes

9. Responsibilities

- Board of Directors – Overall oversight of this policy
- Audit & Risk Committee – Monitor and review the operation of this policy, review bribery/corruption reports from the Company Secretary, and ensure appropriate actions are taken in response to disclosures
- Company Secretary – Day-to-day management, training and monitoring
- Managers – Communicate and enforce the policy within their teams
- All Relevant Persons – Comply with the policy and report concerns

10. Training and Communication

- Policy training is part of new employee induction and refreshed regularly
- We require suppliers and business partners to operate in a manner consistent with our zero-

tolerance stance, which may be reflected in contractual terms or shared guidance

11. Monitoring and Review

The Board, through the Audit & Risk Committee, is responsible for this Policy and monitoring and reviewing its operation.

The Company Secretary has day-to-day operational responsibility for this Policy and must ensure that training on this Policy and their rights and obligations under it is made available to all employees.

We're all responsible for this Policy's effectiveness, so all our people must use it to speak up and disclose bribery and corruption concerns.

This Policy will be reviewed periodically to check that it is operating effectively and whether any changes are required. We'll implement any changes in a timely manner.

12. Questions

You're welcome to comment on this Policy and suggest improvements – contact the Company Secretary (companysecretary@strakergroup.com) to do so.

Last reviewed: September 2025