



Anti-bribery and Corruption Policy

Summary

This policy sets out Mighty Kingdom's position on, and management of, bribery and related improper conduct.





Authorisation

Adoption:	Board
Date:	11 December 2020
Version:	1.0

Amendment History

PROVISION	AMENDMENT	COMMENCING





Contents

Summary.....	1
Authorisation	2
Amendment History	2
Contents.....	3
1. Purpose of this policy	4
2. Policy statement.....	4
3. Who this policy applies to.....	4
4. Unacceptable behaviours	4
5. Acceptable behaviours.....	4
6. Compliance	5
7. Access to this policy.....	5
8. Review	5



1. Purpose of this policy

This policy sets out Mighty Kingdom's position on, and management of, bribery and related improper conduct.

2. Policy statement

Bribery and corruption are illegal and are inconsistent with Mighty Kingdom's values. Mighty Kingdom has a zero-tolerance approach to bribery and corruption, opposes these practices, and supports a culture of compliance with anti-bribery and corruption behaviours.

3. Who this policy applies to

This policy applies to all directors, officers, employees, and contract staff of Mighty Kingdom.

4. Unacceptable behaviours

Unacceptable behaviours under this policy include:

- Bribery - the offering, promising, giving, requesting or accepting a benefit to improperly gain or provide an advantage.
- Facilitation payment - a payment or benefit to a government official to secure or expedite a routine action.
- Secret commission - a payment or benefit to a person who does not disclose this to their superior.
- Money laundering - making an illegal source of income appear to be legitimate.
- Improper gifts or entertainment - gifts or entertainment that are not for legitimate business purposes, that are not consistent with general practice, that are in cash or cash like form, or do not comply with the local laws.
- Political donations - a donation to a political party, a person or body with the intention of benefiting a particular political party, a candidate, or a political campaigner.

5. Acceptable behaviours

Acceptable behaviours under this policy include:

- Proper gifts or entertainment - gifts or entertainment that are for legitimate business purposes, that are consistent with general practice, that are not in cash or cash like form, and comply with the local laws.
- Charitable donations - financial or non-financial support to a charity or not for profit organisation that is legal and ethical.



- Sponsorship - financial or non-financial support to an organisation or activity that is legal and ethical.

These acceptable behaviours must be carried out in a transparent manner and fully reported within Mighty Kingdom.

6. Compliance

Any behaviour that is not in accordance with this policy must promptly be reported to the appropriate person within Mighty Kingdom who will advise the Board or the Audit and Risk committee. If applicable, the report can be via the Whistleblower Policy.

7. Access to this policy

The policy is available on the Mighty Kingdom website at <https://www.mightykingdom.com> and a copy will be provided to all new starters.

8. Review

This policy will be reviewed by the Board as required and at least annually.

