

**Shaver Shop Group Limited**  
ACN 150 747 649

# Anti-bribery and Corruption Policy

## 1 Shaver Shop stands for transparency

Shaver Shop Group Limited (**Shaver Shop**) believes the use of resources or power for private gain has profoundly negative consequences.

Bribery and corruption erodes trust, weakens democracy, hampers economic development and further exacerbates inequality, poverty, social division and the environmental crisis.

We are committed to operating without any instances of Bribery or corruption which go against our key values.

We require all of our Personnel and Business Partners to comply with the standards in this policy in relation to any activity involving the Group anywhere in the world.

The meanings of capitalised words are explained later in this policy.

## 2 What you must not do

If you are covered by this policy, you must not:

- Engage in Bribery, Facilitation Payments or Secret Commissions, except to avoid an immediate threat to your or someone else's safety;
- victimise anyone for not Engaging in Bribery, Facilitation Payments or Secret Commissions or for reporting under this policy;
- make political donations on behalf of Shaver Shop;
- make charitable or community donations or sponsorships that may be perceived as Bribes;
- offer, provide or accept Gifts, hospitality or travel in a manner contrary to this policy; or
- engage or pay a Business Partner knowing or suspecting they may do any of the prohibited conduct.

You must exercise particular care on these matters when Shaver Shop is starting new business ventures or investing in new companies or countries.

## 3 You need to report breaches

You must report to Shaver Shop's CEO or CFO:

- any actual or suspected breaches of this policy that you become aware of;

- any Bribery, Facilitation Payments or Secret Commissions, paid to avoid an immediate threat to your or someone else's safety; and
- any request or demand for something that would breach this policy if it were provided.

Processes are in place to ensure that any reports are logged, investigated and appropriate action is taken. Reports will be considered confidential. The board of Shaver Shop (**Board**) will be made aware of any material reports. If for any reason you are not comfortable reporting such conduct to the CEO and CFO, you can also report concerns pursuant to our Whistleblower Policy.

#### 4 Who is covered by this policy?

This policy applies to:

- Shaver Shop and all subsidiary and affiliate companies over which it exercises control (**Group**); and
- all directors, officers, employees and individual contractors or consultants of the Group (**Personnel**); and
- any person or organisation performing services or acting as agent for the Group (**Business Partners**). Our Business Partners may include distributors, contractors, agents, advisors, consultants, suppliers and joint venture partners.

#### 5 What is Bribery?

**Bribery** occurs when a person gives, offers or promises a benefit or something of value, either directly or indirectly, in order to obtain or retain a business advantage for the Group that is not legitimately due. Bribery also includes a request for, or receipt of, a bribe.

**Bribes** include monetary or non-monetary benefits and encompass Gifts, hospitality, entertainment, travel, donations, sponsorships, loans, reciprocal favours, business or employment opportunities, promotions and any other provision of favours of significant value.

When we say what you must not do, we mean all the ways you can **Engage** in an activity, including doing the activity, as well as offering to do, promising to do, requesting someone do or authorising the activity or causing someone else to do, offer to do, promise to do, request someone do or authorise the activity.

You must not Engage in Bribery, except to avoid an immediate threat to your or someone else's safety.

#### 6 What are Facilitation Payments?

**Facilitation Payments** are unofficial payments that are made with the intention to secure or expedite the performance by a public official of a routine governmental action. **They are bribes.**

You must not Engage in Facilitation Payments, except to avoid an immediate threat to your or someone else's safety.

## 7 What are Secret Commissions?

**Secret Commissions** are when an agent accepts, requests or authorises a monetary or non-monetary benefit from a third party, without disclosing the benefit to their principal, in return for favouring that party in the course of their principal's business. **Secret Commissions are bribes.**

You must not Engage in Secret Commissions, except to avoid an immediate threat to your or someone else's safety.

## 8 Guidelines for charitable donations

Charitable or community donations or sponsorships can be a disguise for a form of Bribery. For example, a donation to an organisation associated with a person who can make decisions affecting Shaver Shop.

You must not make charitable or community donations or sponsorships that may be perceived as Bribes.

All charitable donations made on behalf of Shaver Shop must:

- be approved according to Shaver Shop's approval processes;
- be documented, with all records kept; and
- comply with local laws and practices.

## 9 Gifts, hospitality and travel

You may only provide or receive Gifts, hospitality or travel if they are:

- not cash, loans or cash equivalents;
- reasonable and modest value (when considered in isolation and in the context of other Gifts, hospitality or travel offered by the same recipient);
- appropriate and consistent with reasonable business practice;
- provided only for the purpose of building or maintaining business relationships or normal courtesy, and never be offered for something in return or during a negotiation or tender process;
- not intended, or could not be reasonably perceived as, an attempt to obtain a business or business advantage;
- provided in an open and transparent manner;
- not embarrassing to Shaver Shop or the recipient or would not be if disclosed; and
- permissible, and within the monetary limits and disclosure requirements, under relevant laws, regulations, rules or codes (including Shaver Shop policies).

Gifts, hospitality or travel must not be provided to, or received from, public or government officials or their associates, including politicians or political parties.

**Gifts** means any gift, gratuity, favour, benefit, discount, forbearance, or other tangible or intangible item having monetary value for which the recipient does not pay fair market value. A gift also includes meals, drinks, entertainment and recreation (tickets, passes, etc.), services, training, transportation, discounts, promotional items, lodging, gift cards, door prizes or physical items (such as 'free' products, flowers, wine, tickets to events and the like).

All Gifts, hospitality or travel you provide or receive or provide must be reported under Shaver Shop usual procedure.

## **10 Consequences of breaches**

Shaver Shop has a zero tolerance approach to breaches of this policy. A breach involving Shaver Shop may result in significant fines and damage to our reputation and standing in the community.

If you breach this policy, you may face:

- disciplinary action – including termination of your employment or contract with Shaver Shop; and
- criminal or civil liability – including time in jail and significant fines.

You must cooperate fully and openly with any investigation by Shaver Shop into any alleged or suspected breach of this policy. Failure to cooperate or to provide truthful information is a breach of this policy.

## **11 Reviewing our policy**

Shaver Shop will review this policy and our associated procedures at least annually to ensure:

- our Personnel understand this policy and have sufficient training in relation to it;
- reports under this policy are appropriately recorded, investigated and responded to; and
- that the policy and procedures continue to operate effectively or require changes.