

Our Commitment

The CFC Group ("Group") will meet its obligations under applicable laws, regulations, relevant codes of practice and other corporate compliance documents adopted by the Group Board and Business Unit Boards. This policy is underpinned by and to be read in conjunction with the Group Code of Conduct.

This policy applies to everyone working for the Group or on its behalf including employees, contractors, subcontractors and suppliers.

Our Approach

The Group will achieve our commitment by:

- ▶ Fostering a culture of compliance that ensures an appropriate balance between the organisation's performance and conformance to applicable laws, regulations and relevant codes of practice.
- ▶ Implementing policies, practices and systems of work that support a culture of compliance and actively work to prevent illegal conduct such as fraud, theft, corruption, bribery or criminal damage to property.
- ▶ Establishing compliance management practices aligned to *AS ISO 19600:2015 – Compliance management systems*.
- ▶ Providing employees with training and assistance to become effectively involved in compliance activities to meet their obligations.
- ▶ Enabling a culture of frank and open disclosure of compliance breaches without fear of victimisation or unfair treatment.
- ▶ Monitoring and addressing control weaknesses that have or might lead to compliance breaches.
- ▶ Encouraging and enabling everyone to raise concerns about the implementation of this policy.
- ▶ Managing any identified breaches of this policy through the Group Code of Conduct.

Responsibility

Group employees, contractors, subcontractors and suppliers are expected to read, understand, raise any concerns and adhere to this policy and all related supporting documents. The Executive team are accountable for ensuring this policy is implemented.

The Group Board has ultimate responsibility for ensuring this policy meets the minimum baseline obligations for each organisation within the Group, is aligned with the Group's values and is implemented by management.

This policy has been approved by the Group Board and will be reviewed biennially.



Philip Cardaci
Group Executive Chairman