



ANTI-BRIBERY AND CORRUPTION POLICY



Duxton Water Limited
ACN 611 976 517

ANTI-BRIBERY AND CORRUPTION POLICY

1. INTRODUCTION

- 1.1 This Board Charter has been developed and approved by the Board of Duxton Water Limited ACN 611 976 517 ("Company") to establish the standards regarding anti-bribery and the prevention of corruption by all personal of the Company.
- 1.2 The Company and Investment Manager strives to conduct business with integrity and will endeavour to meet the highest anti-bribery and anti-corruption standards.

2. SCOPE

- 2.1 This policy applies to all employees, contractors, consultants and advisers of the Company ("Relevant Persons"), including the Investment Manager, in terms of all dealings and transactions.
- 2.2 Our policy extends to our partners and suppliers who shall also be expected to conduct themselves with honesty, fairness and high ethical standards and to abide by all anti bribery and corruption laws so as to avoid even the perception of impropriety or a conflict of interest.

3. POLICY

- 3.1 Bribes/facilitation payments
 - 3.1.1 No facilitation payment or bribe or other unlawful payment or inducement in any form may be made or received, directly or indirectly, to anyone for the purpose of obtaining or retaining business, or to obtain any other favourable action. A violation of this policy will subject the Relevant Person to disciplinary action as well as potential criminal prosecution.
- 3.2 Gifts
 - 3.2.1 Relevant Persons must exercise extreme care when giving or receiving business-related gifts.
 - 3.2.2 Relevant Persons should exercise particular caution in regard to any offers of value, including hospitality, entertainment and gifts when the Company is negotiating a contract and so may be in a position to influence, directly or indirectly the outcome of a decision. There must not be an impression of an improper connection between any gift and business opportunities.
 - 3.2.3 Relevant Persons must not request gifts from any party with whom the Company conducts business. Relevant Persons must not exchange gifts with the Company's competitors as this may create an actual or perceived conflict of interest.

3.3 Agreements with competitors

3.3.1 Formal or informal agreements with competitors that seek to limit or restrict competition in some way are often illegal. Unlawful agreements include agreements that seek to fix or control prices, allocate products, markets or territories, or boycott certain parties.

3.3.2 To ensure compliance with applicable competition and anti-trust laws, discussions with competitors regarding any of these potential agreements is a violation of Company policy and will subject the Relevant Person to disciplinary action as well as the potential for criminal prosecution.

4. REVIEW OF CHARTERS

This Policy will be reviewed at least annually.

Adopted on 25 November 2020



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Duxton Water Anti-Bribery & Corruption Policy
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