

Anti-Bribery and Corruption Policy

Purpose:	To set out TSA Riley's commitment to maintaining the highest levels of conduct and integrity, and to ensure compliance with ethical and legal standards in accordance with all applicable anti-bribery and corruption laws in the jurisdictions in which the Group operates.
Applicable to:	TSA Management Group Holdings Pty Ltd and its affiliated corporate entities (TSA Riley).
Region(s):	Group (all Staff)

Definitions

Term	Definition
Staff	Board members, employees, casual employees, independent contractors, subconsultants and volunteers of TSA Riley Group.

Policy Statement

TSA Riley values its reputation for conducting business with integrity and prohibits all forms of bribery and corruption. This includes:

- Offering, promising, giving, or accepting anything of value to improperly influence a business decision.
- Facilitation payments or unofficial payments to secure or expedite routine actions.
- Any conduct that creates the appearance of improper influence.

All Staff are expected to demonstrate honesty, integrity and fairness in all aspects of their business dealings and to uphold appropriate standards of professionalism and ethical conduct in all business activities.

TSA Riley takes appropriate steps to ensure that:

- Staff do not, directly or indirectly, offer, promise, give, accept or demand a bribe or other undue advantage (including excessive gifts and hospitality) to obtain or retain business, or gain any other improper advantage.
- Business is only conducted with third parties that are reputable and aligned with the expected ethical standards.
- Actual, potential or perceived conflicts of interest are identified, disclosed and appropriately managed.
- Policies and procedures are documented, communicated and accepted through induction training, including those relating to whistleblowing and gifts and hospitality.
- Awareness is encouraged through training at all levels and mechanisms are in place for reporting suspected misconduct confidentially and without fear of retaliation.
- Procurement and employment practices are conducted in a fair, transparent and ethical manner.
- Financial accounting and auditing practices are maintained to ensure all transactions are accurately recorded and fairly reflect their true nature.
- Compliance with this Policy is monitored through internal controls, audits and regular reviews.

This Policy will be periodically reviewed to ensure continued suitability.

Name Andrew Tompson
Position Chief Executive Officer
Date 1st July 2026
Signature 