



ANTI-BRIBERY AND CORRUPTION POLICY
Policy Document



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1. PURPOSE

This policy sets out MISCO Australia's commitment to conducting business honestly and free from bribery, corruption, and unethical influence.

Its purpose is to prevent, detect, and respond to any form of improper conduct that could compromise MISCO's integrity or reputation.

2. POLICY STATEMENT

MISCO Australia maintains a zero-tolerance approach to bribery and corruption.

All employees, directors, and business partners must act honestly, fairly, and in good faith when dealing with customers, suppliers, contractors, and government officials.

We comply fully with the Criminal Code Act 1995 (Cth), the Corporations Act 2001, and all relevant international anti-corruption laws.

3. OBJECTIVES

- Prevent bribery and corruption in all forms.
- Provide clear guidelines for ethical decision-making.
- Protect MISCO's people and reputation from legal and financial risk.
- Reinforce our corporate values of integrity and transparency.
- Support compliance with ISO 37001 Anti-Bribery Management Systems principles.

4. SCOPE

This policy applies to all directors, employees, contractors, consultants, agents, and suppliers acting on behalf of MISCO Australia in any location or capacity.

5. DEFINITIONS

Bribery: Offering, promising, giving, accepting or soliciting anything of value to improperly influence a decision or gain an unfair advantage.

Corruption: Abuse of entrusted power for personal or corporate gain.

Facilitation Payment: A small unofficial payment to expedite routine government actions – strictly prohibited by MISCO.

Gift or Hospitality: Anything of value such as cash, vouchers, meals, entertainment, or travel offered to build a business relationship.

6. POLICY REQUIREMENTS

6.1 Prohibition of Bribery and Corruption

- No employee or representative may offer, give, receive or solicit a bribe.
- All transactions must be transparent and recorded accurately.
- MISCO will not tolerate improper payments to secure business advantages.

6.2 Gifts and Hospitality

- Modest and infrequent gifts or hospitality may be accepted only if:
 - They are for legitimate business purposes;
 - They are reasonable in value and frequency; and
 - They cannot reasonably be perceived as influencing a business decision.
- Cash or cash equivalents must never be given or accepted.
- All gifts and hospitality above a nominal value must be declared to management for approval and entry in the Gifts Register.

6.3 Facilitation Payments

- MISCO strictly prohibits facilitation payments or any unofficial payments to government officials or others.
- Any request for such payments must be refused and reported immediately.

6.4 Political and Charitable Contributions

- MISCO does not make political donations.
- Charitable contributions must be transparent, lawful, and approved by Directors.
- Donations must never be used as a disguised form of bribery.

6.5 Third-Party Due Diligence

- All agents, distributors, consultants, and suppliers must undergo ethical and commercial due diligence.
- Contracts must include anti-bribery and corruption clauses requiring compliance with this policy.

6.6 Record Keeping

- All financial transactions must be recorded accurately and supported by appropriate documentation.
- False or misleading entries are strictly prohibited.

7. RESPONSIBILITIES

Role	Responsibilities
Directors	Establish and oversee anti-bribery controls, approve high-risk transactions, and lead by example.
Managers	Communicate policy requirements, maintain the Gifts Register, and monitor compliance.
Employees & Contractors	Comply with this policy and report suspected breaches immediately.
Suppliers & Agents	Conduct business ethically and adhere to MISCO’s Supplier Code of Conduct.

8. REPORTING AND WHISTLEBLOWING

- Employees must report any suspected bribery or corruption to management or a Director.
- Reports may also be made confidentially under the Whistleblower Policy.
- MISCO prohibits retaliation against anyone who reports concerns in good faith.

9. BREACHES AND CONSEQUENCES

Non-compliance may result in:

- Disciplinary action (up to termination of employment or contract);
- Civil or criminal liability; and
- Notification to law enforcement authorities.

10. TRAINING AND COMMUNICATION

- All employees receive training on this policy at induction and during refresher programs.
- Key personnel involved in procurement or international trade receive enhanced anti-corruption training.
- Copies of this policy are available on company noticeboards and in the IMS document register.

11. REVIEW AND CONTINUOUS IMPROVEMENT

This policy will be reviewed at least every two (2) years, or sooner if legislative or operational changes occur.

The Directors are responsible for ensuring the policy remains current and effective.

12. RELATED POLICIES AND DOCUMENTS

- Code of Conduct & Business Ethics
- Conflict of Interest Policy
- Whistleblower Policy
- Corporate Governance Statement
- Supplier Code of Conduct
- Procurement Policy

13. ACKNOWLEDGEMENT

All employees, contractors, and representatives must acknowledge that they:

- Have read and understood this policy;
- Agree to comply with its requirements; and
- Understand that breaches may result in disciplinary action or prosecution.

Approved By:

Rhiannon Frankas – Director

Daniel Frankas – Director

Date: 11.10.2025



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