



Anti-Bribery and Corruption Policy

1. Our Tikanga guides us

When faced with choices we make sound decisions knowing they will be subject to scrutiny. We are committed to securing and supporting the continued wellbeing of people, businesses and communities.

To help achieve this, we embed a culture of zero tolerance to bribery, corruption and facilitation payments across all areas and levels of our business.

We recognise that bribery and corruption has an adverse effect on communities. Bribery and corruption impede economic growth, undermine accountability, democratic processes, basic human freedoms, impoverishing states and distort competition.

2. Application

This policy applies to all directors, and all employees (including any secondee, contractor or consultant) of Contact Energy and its subsidiaries (collectively 'employees').

This policy extends beyond Contact's responsibility to comply with bribery and corruption laws globally, to ensure that any third parties we engage to act on our behalf do the same.

This policy should be read in conjunction with the Gifts Policy and the Conflict of Interest Policy.

3. Key Principles

- Contact has zero tolerance to bribery and corruption.
 - The giving, receiving, offering or promising of a bribe or facilitation payment is expressly prohibited.
 - Training and awareness about our zero tolerance for bribery and corruption is undertaken across Contact.
 - The Leadership Team is committed to promoting a culture of compliance with our zero tolerance policy.
 - Business activities must be transparent, and sufficiently documented.
 - Contact has *Protected Disclosures (Whistleblowing) Policy* which outlines the process for reporting suspected wrongdoing.
 - Appropriate due diligence must be conducted, documented, and communicated with those who we do business with.
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4. Jargon Buster

"Bribery" is the offer, promise or giving of anything of value in order to improperly influence a person's actions or decisions to gain or retain a business benefit. Bribery and corruption can take many forms including, the provision or acceptance of cash payments, facilitation payments, kickbacks, political contributions, charitable contributions, social benefits, gifts, travel, hospitality and rebates or reimbursements.

"Corruption" is the misuse of entrusted power or office, whether in the public or private sector, for private gain.

“**Facilitation payments**” are typically small, unofficial payments made to secure or expedite a routine government action by a government official. These constitute Bribes under the law, regardless of whether they are a “way of doing business” in a particular country.

A “**kickback**” is payment for awarding business given to a person in a position of power or influence for having assisted the supplier in relation to awarding of the business.

5. Zero Tolerance

Contact has a zero tolerance approach to Bribery and Corruption.

No individual shall, either directly or indirectly through third parties:

- Offer, promise or give to; or
- Seek, accept, request or agree to receive a financial or other advantage from a customer, supplier or any other third party with the intention of inducing or rewarding them to secure an improper business benefit.

Bribery of public officials, companies, and private individuals of any country is equally prohibited this policy.

6. Facilitation Payments

Facilitation payments or “Kickbacks” of any kind must not be made or accepted.

Individuals who are asked to make a payment on behalf of Contact must be mindful of what the payment is for, and whether the amount requested is proportionate to the goods and services being provided. The Governance team should be consulted where there is doubt whether certain payments constitute Facilitation payments.

Any request for a Facilitation payment must be reported to the Governance team.

7. Political and Charitable donations

Political donations shall not be made to political parties, candidates, or to any political cause or election fund. The only exception is where a donation has been expressly approved by the Board.

Charitable donations shall not be made for purposes of gaining commercial advantage. All charitable donations must be reported to the Finance team for annual reporting.

8. Compliance

Contact requires all of its directors and employees to comply with this policy. Compliance with this policy will be periodically monitored by the General Counsel and/ or the Chief Financial Officer.

Any known or suspected instances of non-compliance should be discussed with your manager, your Leadership Team member, or the General Counsel. Alternatively, any employee who is aware of a breach of this policy can take action in accordance with Contact’s [Protected Disclosures \(Whistleblowing\) Policy](#).

9. Accountabilities

All directors and employees are responsible for:

- Reading, understanding and complying with this policy at all times.
- Being vigilant to “red flag” issues or significant bribery risks, which necessitate further due diligence.
- Reporting any incidents of facilitation payments or kickbacks, or any other actual or potential breaches of this policy or concerns to the Governance team.

10. Document control

Approved

July 2020

Document owner

General Counsel,
Governance