

# NUFARM LIMITED ANTI BRIBERY POLICY

## Introduction

The principles of this Policy must be read in conjunction with, and are subject to, the laws in each country or jurisdiction where Nufarm operates, and the responsibilities of employers and employees in the respective countries and jurisdictions where Nufarm operates. The principles of this Policy must also be read in conjunction with specific anti bribery policies adopted by respective Nufarm subsidiaries in compliance with the laws of specific countries.

## Background

Nufarm's [Code of Conduct](#) requires the Company and its subsidiaries to conduct business in a manner which recognises and adheres to all relevant laws and regulations and meets high standards with respect to honesty and integrity where Nufarm undertakes business. The Code of Conduct also requires Nufarm employees to avoid in engaging in any practice that could be seen as bribery, fraud or otherwise unethical

## Who Does the Policy Apply To?

This Policy applies to all Nufarm Group Companies. All Nufarm Group directors, officers and employees are covered by the Policy.

## Anti Bribery Policy

Nufarm strictly prohibits the making or receiving of unlawful improper payments, or the giving or receiving of anything of value or improper advantage, to or by any individual or entity with the intent of securing a business advantage for Nufarm to which it is not legally entitled.

The Policy prohibits improper payments to persons or entities including:

- public officials;
- any Nufarm customer;
- any other individual or entity with whom Nufarm does business.

The Policy prohibits the following types of improper payments:

- bribery of any public official regardless of location;
- improper payments, or the provision of other improper benefits or advantage, either tangible or intangible, made in the course of Nufarm's business activities including illegal facilitation payments and secret commissions;
- the giving or receiving of gifts and/or entertainment not in accordance with the Policy;
- money laundering.

## Reporting Breaches of the Policy

Nufarm strongly supports the reporting of any identified or suspected instances of improper payments or related conduct. Any employee who suspects cases of improper payments or related conduct should report such conduct in accordance with the provisions of Nufarm's [Whistleblower Policy](#). Nufarm is committed to the protection of genuine whistleblowers against action taken in reprisal for making good faith reports. Protection under the [Whistleblower Policy](#)

is in addition to any protections that may arise under any laws in the countries or jurisdictions where Nufarm operates.

### **Sanctions for Breach of the Nufarm Anti Bribery Policy**

Subject to the conditions of employment and legal requirements applying in each jurisdiction, Nufarm may take disciplinary action against any employee who knowingly or recklessly contravenes the Nufarm Anti Bribery Policy. Such action may include dismissal. In no circumstances will Nufarm indemnify any employee found to be acting in breach of the Nufarm Anti Bribery Policy