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## CORPORATE POLICY – ANTI-BRIBERY AND CORRUPTION POLICY

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### MYECO GROUP LTD (ACN 064 755 237) AND SUBSIDIARIES (GROUP)

#### 1. PURPOSE OF THE POLICY

MyEco Group Ltd (the "Company" or "MyEco") and its subsidiaries take all reasonable steps, so far as is possible, to ensure that all Directors, employees (full time, part time), casuals, contractors, secondees and, to the extent possible, consultants and advisors of the Company, its subsidiaries and joint venture companies (collectively "MyEco Group Personnel"), comply with local laws and international good practice and will not become involved in any way in the offering, payment, soliciting or acceptance of bribes in any form. This policy outlines the processes to ensure all MyEco Group Personnel are aware of anti-bribery and anti-corruption principles and apply them in all Company activities.

#### 2. BACKGROUND

The Company has a well-established reputation for conducting business in an ethical and honest way.

As a Company we strive to participate as a strong competitor in our global market and are committed to doing so without the use of bribery or other corrupt practices to obtain an advantage.

Bribery and corruption are morally wrong and could seriously damage our reputation and standing in the community. They are also inconsistent with our values and expose our company and the people involved to the risk of imprisonment and other serious criminal and civil penalties.

The Company will apply a "zero tolerance" approach to acts of bribery and corruption by any of our directors, senior executives or employees, and is committed to acting lawfully, fairly and with integrity in all its business dealings and relationships wherever it operates and implementing and enforcing effective systems to counter bribery and corruption.

#### 3. What is bribery?

Acts of bribery are designed to influence individuals to act dishonestly in the performance or discharge of their duty. Bribery is the act of offering, promising, giving, demanding or accepting any financial or other advantage as an inducement for an action which is illegal, unethical or a breach of trust. Bribes can take on many different forms, but typically there will be a "quid pro quo" – meaning that both parties, or a party's designate, will benefit.

A bribe could be:

- the direct or indirect promise, offering or authorisation, of anything of value (whether the value is material or not) with the expectation or hope that a business advantage will be received, or to reward a business advantage already given;
- giving or accepting gifts, entertainment and/or hospitality during any commercial negotiations or tender process, if this could be perceived as intended or likely to influence the outcome, or which are unduly lavish or extravagant in the circumstances –MyEco Group Personnel must not accept gifts, entertainment or hospitality where to do so might influence, or be perceived to influence, objective business judgement (see section 4 below);
- improper payments or benefits to government officials or representatives, or politicians or political staff;
- payment of secret commissions to those acting in an agency or fiduciary capacity;
- the offer or receipt of any kickback, loan, fee, reward or other advantage for a private business favour or advantage; or
- the giving of aid, donations or voting designed to exert improper influence.

#### **4. Gifts, entertainment and hospitality**

MyEco does not permit the exchange of gifts or involvement in entertainment or hospitality activities that is beyond general commercial practice or that occurs in circumstances that could be considered to give rise to undue influence.

As a general rule, the offer or acceptance of gifts, entertainment or hospitality is permitted where it:

- (a) is for a legitimate business purpose, which may include developing business relationships, improving or maintaining the Company's image or reputation, or marketing or presenting the Company's products and/or services effectively;
- (b) does not take place with public officials from which a decision regarding any licence, permit, authorisation or any other official act or decision is pending;
- (c) if it involves, or is reasonably likely to involve, a third party paying for travel or accommodation, that payment is approved by the CEO or CFO;
- (d) complies with the local law and government policies of the country in which the expenditure is made;
- (e) is given in an open and transparent manner;
- (f) does not include cash, loans or cash equivalents (such as gift certificates or vouchers); and
- (g) complies with the financial approval requirements referred to below.

Gifts and entertainment reasonably estimated to be in excess of a value of \$200 must be approved by the manager who would usually authorise similar expenditure by the employee accepting the gift or entertainment.

In some cases, it may not be appropriate to accept or retain a gift or to be provided with entertainment or hospitality and the person may be asked to refuse or return the gift or to refuse the entertainment or hospitality, for example where there could be a conflict of interest which might influence, or be perceived to influence, objective business judgement.

Invitations where travel and accommodation are involved must be authorised by a senior executive, or in the case of senior executives, by the Board of Directors, or in the case of the Board of Directors, by the Chairman. Any such invitations to the Chairman must be authorised by the Risk and Audit Committee.

#### **5. Donations**

##### **Political donations**

MyEco Group Personnel must not, on behalf of MyEco, make a political donation to any political party, politician or candidate for public office in any country unless the donation has been approved in advance by the Board and complies with the local law and government policies of the jurisdiction where the donation is made. It must also be recorded accurately in MyEco's accounts.

Attendance at political gatherings, meetings and functions in a professional capacity is permitted where there is a legitimate business purpose.

##### **Charitable donations and social programs**

Apart from political donations, MyEco may make charitable donations and contribute to social programs (e.g. community education and health programs) as permitted by local laws and practices. No charitable donation or social programs may be offered or made on behalf of MyEco by an employee or senior executive without the prior approval of the CEO or CFO or in the case of the CFO without the prior approval of the CEO or in the case of the CEO or a director without the prior approval of the Chair of the Board or the Board.

Reasonable care must be taken to ensure that charitable donations and social programs are applied for a legitimate and appropriate purpose.

## 6. Record-keeping and risk management

Any gift, entertainment or hospitality in excess A\$200 in value given or received by MyEco Group Personnel in connection with their role at MyEco;

any political or charitable donation made by or on behalf of MyEco; or

any attendance at a political gathering, meeting or function by MyEco Group Personnel due to or in connection with their role at MyEco, and the cost of the attendance;

must be notified to the CFO and recorded in the Gifts and Entertainment Register. It is each MyEco Group Personnel's responsibility to ensure this is done.

All accounts, invoices, and other records relating to dealings with third parties including suppliers and customers should be prepared with accuracy and completeness. Accounts must not be kept 'off-book' to facilitate or conceal improper payments.

## 7. Training and communications

Training on this policy forms part of the induction process for all individuals who work for the Company, and further training will be provided as necessary. The Company will also make this policy available on its website.

The Company's zero-tolerance approach to bribery and corruption must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and as appropriate thereafter.

## 8. Compliance

MyEco Group Personnel must not engage in any activity that might lead to breach of this Policy. Further, MyEco Group Personnel should ensure that they are familiar with local laws and, where a law imposes a higher standard than the Policy, MyEco Group Personnel operating in that country must fully comply with the higher standard.

In appropriate instances, MyEco will provide country-specific directions for MyEco Group Personnel and MyEco subsidiaries operating in countries outside of Australia.

There is legislation in many countries, including Australia (the Criminal Code Act), the United Kingdom (the Bribery Act) and the United States (the Foreign Corrupt Practices Act and Anti-Kickback Statute), that prohibit bribery and corruption and are enforced with vigour by their respective authorities. Acts of bribery and corruption committed overseas may result in prosecution at home and in other jurisdictions.

Any breach of this policy will be regarded, not only as a criminal act and reported accordingly, but also as serious misconduct and may result in disciplinary action up to and including dismissal. If an employee is unsure whether or not he or she may be in breach of this Policy, the employee must contact his or her supervising manager and seek guidance.

MyEco Group Personnel must report any instance where they believe that non-compliance with the Policy has occurred, is occurring, or is being planned, as soon as they become aware of it. This includes potential violations of laws, unethical behaviour within the Company, suspicions of fraud, improper payments to government officials, or any other occurrences that would contribute to non-compliance with our Company standards.

As per the whistleblower policy, you can discuss your concerns with your manager, or the Company Secretary by phone on +61 423 412 399 or via email at [clia@myeco.group](mailto:clia@myeco.group). Where your concern relates to misconduct or improper circumstances or behaviours connected to MyEco, they will in turn report the matter to the Chair of the Risk and Audit

Committee (RAC) Chair (RAC Chair) unless the RAC Chair is the subject of the complaint. In that case, it will be reported to the Chair of the Board of Directors (Board Chair).

Alternative, you can also safely and confidentially report concerns directly to the external service platform at [yan.flageul@mazars.com.au](mailto:yan.flageul@mazars.com.au).

All disclosures will be taken seriously, investigated and treated with the utmost confidentiality to the extent possible.

The Board must be informed of any material incident of bribery or corruption.

MyEco Group Personnel are also encouraged to contact the CEO or CFO if they have any questions or concerns regarding this Policy or subject matter to which this Policy relates. Any enquiries will be treated with the utmost confidentiality to the extent possible.

#### **9. Adoption of Policy and Board Review**

This policy was last reviewed and amended by the Board on 24 October 2025 and takes effect from that date and replaces any previous update in this regard. This policy can only be amended with the approval of the Board. The Company Secretary will communicate any amendments to management, and the Chief Executive Officer shall communicate these to other MyEco Group Personnel as appropriate.