

## Anti-Bribery and Anti-Corruption Policy

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### Document Control – Version History

Version	Approved By	Date	Summary of Changes
1	Rebekah Letheby	(Original)	Initial release of the Anti-Bribery and Anti-Corruption Policy.
2	Rebekah Letheby	23 July 2023	Periodic review and minor revisions to the Policy.
3	Rebekah Letheby	28 May 2026	<p>Updates following policy review:</p> <ul style="list-style-type: none"> <li>• Added title page with version control table and a table of contents.</li> <li>• Section 3 (Policy Statement): updated Australian bribery penalties to reflect the Crimes Legislation Amendment (Combatting Foreign Bribery) Act 2024.</li> <li>• Section 5 (Gifts and Hospitality): reduced declaration threshold from AUD\$1,000 to AUD\$100.</li> <li>• Section 6 (Political Contributions by Aurora Labs): rewritten to prohibit contributions to political parties, political organisations and individual politicians, with the rationale grounded in Australian electoral, foreign influence and corporate governance frameworks.</li> <li>• Section 9 (Charitable Contributions): reduced significant donation disclosure threshold from A\$500 to A\$100, consistent with the revised Gifts and Hospitality threshold.</li> <li>• Section 18.1.5 (Glossary): added a substantive definition of “Relevant Persons” covering board members, executives and employees of Aurora Labs.</li> <li>• Added Appendix A – Legislative and Regulatory Citations, providing specific section-level references to the Australian frameworks underpinning this Policy.</li> <li>• Drafting consistency: the defined term “Relevant Persons” is now used uniformly across Sections 1, 2, 10, 14 and 16 in place of looser formulations such as “those who work for it”, “employee”, “anyone” and “those under its control”. Section 2</li> </ul>

Version	Approved By	Date	Summary of Changes
			has been simplified to cross-reference the definition rather than duplicate it. Minor typographical correction in Section 2.2.

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## 1. Purpose

This Policy sets out the responsibilities of Aurora Labs (including other Group Companies, such as subsidiaries) and Relevant Persons, in regard to bribery and corruption.

It is a source of information and guidance for Relevant Persons and those working with Aurora Labs, as it helps them to recognise and deal with bribery and corruption issues, as well as understand their responsibilities.

Importantly, this Policy does not constitute legal advice.

## 2. Applicability

2.1. This Policy applies to all Relevant Persons, as defined in Section 18.1.5.

2.2. Any business partner, joint venture partner, distributor, introducer, contractor, supplier or agent of a Group Company that is not contractually bound to comply with this Policy (and therefore not a Relevant Person under Section 18.1.5(v)) is nonetheless expected to:

- (i) comply with anti-bribery and anti-corruption laws applicable to those parties; and
- (ii) act consistently with the principles of this Policy.

## 3. Policy Statement

Aurora Labs is committed to conducting its business and operations with integrity and minimising the risks of bribery and corruption. It does not condone bribery or corruption in any form.

Corruption means the illegal or dishonest behaviour usually performed by people in positions of power. Corrupt behaviour can include both blackmail (coercing another to do something by threatening to reveal certain information) and Extortion (taking money or property through threats).

3.1. Relevant Persons are expected to:

- (i) conduct all business in an honest and ethical manner;
- (ii) be committed to acting professionally, fairly and with integrity in all business dealings and relationships;
- (iii) not permit the making of any inappropriate or excessive promises, gifts or hospitality to foreign (anyone really, Australian officials or potential suppliers, etc) public officials in order to achieve unfair advantage or benefit; and
- (iv) resist any efforts made by others (including existing or potential suppliers, customers or clients) to unfairly affect any official decision-making process in order to achieve an unfair advantage or benefit.

Aurora Labs also expects its business partners, joint venture partners, introducers, contractors, suppliers and agents to implement and enforce effective systems to counter bribery and will uphold

all laws relevant to countering bribery and corruption in all the jurisdictions in which it / they operate.

Aurora Labs remains bound by the laws in Australia in respect of its conduct both at home and abroad. It will document any breach of the law that is brought to its attention and may report such breach through the reporting mechanism provided by Australian authorities.

Under Australian law at the date of this Policy, bribery and corruption are punishable for individuals by up to ten years' imprisonment, a fine of up to 10,000 penalty units (approximately AUD \$3.3 million based on the current Commonwealth penalty unit value), or both. If Aurora Labs is found to have taken part in corruption, directly or indirectly via an agent, relative or business partner, Aurora Labs could face a fine that is the greatest of AUD \$33 million, three times the value of the benefit obtained, or 10% of annual turnover, be excluded from tendering for public contracts, and face damage to a Group Company's reputation.

Any breach of this Policy may result in disciplinary action, including termination of employment or contract. If the matter involves a breach of law or other regulation, the matter may also be referred to an appropriate law enforcement authority.

Given the diversified and expanding nature of Aurora Labs' operations across numerous sectors and countries, Aurora Labs may create country-specific work practices, which sit underneath this Policy, to comply with and adapt to the nuances of local laws and minimise the risk of corruption and bribery.

## 4. Bribery

Bribery is the offering, promising, giving, accepting or soliciting of an advantage as an inducement for action which is illegal or a breach of trust. A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage. Bribery includes facilitation payments i.e., a payment or gift made to 'facilitate' actions that should not be done as part of someone's normal work.

Bribery is not limited to the act of offering a bribe. If an individual receives a bribe, and they accept it, they are also breaking the law.

Relevant Persons must not give, offer, promise, accept, request or authorise a bribe, either directly or through any Third Party (such as an agent, introducer or distributor). Specifically, Relevant Persons must not bribe a foreign public official anywhere in the world.

## 5. Gifts and Hospitality

Aurora Labs accepts reasonable and appropriate expenditure relating to hospitality, gifts, business networking and legitimate activities related to the conduct of Aurora Labs' business and operations.

Relevant Persons must declare all gifts and hospitality valued at **A\$100** or more in the Gift and Hospitality Register (**Register**), which the Company Secretary will maintain. Declarations must be

notified by a Relevant Person to their line manager (if applicable) and the Company Secretary. Aurora Labs may establish procedures and forms for this purpose.

Aurora Labs acknowledges that repeated gifts and hospitality from and to the same Third Parties may occur and can consider cumulative figures and the appropriateness of these cumulative disclosures.

Aurora Labs may conduct audits to ensure disclosure requirements are being complied with and may risk assess and manage particular transactions and relationships which may be of concern to Aurora Labs.

5.1. Reasonable and proportionate gifts and hospitality will be those which:

- (i) are fully documented and disclosed;
- (ii) are connected to Aurora Lab's business activities (e.g. working lunches, networking events, speaking at conferences);
- (iii) are and are perceived to be a token gesture of appreciation or common courtesy (e.g. a gift provided in appreciation of hosting events, industry roundtables or business delegations and where refusal would be unnecessary or unreasonably offensive);
- (iv) are and are perceived to be culturally appropriate and contextual, particularly where Relevant Persons are travelling on Aurora Labs business (e.g. a ceremonial gift); and/or
- (v) comply with relevant local laws.

5.2. Gifts and hospitality which will not be reasonable and proportionate include:

- (i) cash;
- (ii) gifts or hospitality which are expressly connected with a corresponding obligation or expectation;
- (iii) are grossly inappropriate or disproportionate in value based on the relationship; and/or
- (iv) those that are secret, not made openly or the giver or receiver asks that it not be disclosed.

Where Relevant Persons are unsure of their obligations, they may refuse the gift and/or hospitality and/or seek advice on whether to accept or refuse. Relevant Persons may wish to register and document the offer and refusal of the gift or hospitality.

Where it is not appropriate to decline the offer of a gift (e.g. when meeting with an individual or organisation who will take offence), the gift may be accepted and declared. Where it is deemed inappropriate by the Company Secretary, the gift may be recorded in the Register and then returned to the giver or donated to charity depending on the circumstances.

Aurora Labs appreciates that the practice of giving business gifts varies between countries and regions and what may be normal and acceptable in one region may not be in another. The test to be applied is whether in all the circumstances the gift or hospitality is reasonable and justifiable. The intention behind the gift should always be considered.

In all circumstances, the above-mentioned value limits apply, and if unsure about receiving or offering a gift or hospitality, please refer to Aurora Labs Company Secretary for guidance and approval.

## 6. Political Contributions by Aurora Labs

Aurora Labs **will not** make contributions, financial or in kind, to political parties or political organisations, or to individual politicians, party officials, candidates or sitting members of parliaments. This position applies to Aurora Labs, its Group Companies and any business unit or divisional level of the organisation.

This prohibition reflects Aurora Labs' commitment to political neutrality, transparency and the avoidance of perceived or actual undue influence over public officials. The position is informed by the disclosure and foreign donation provisions of the Commonwealth Electoral Act 1918 (Cth), the Foreign Influence Transparency Scheme Act 2018 (Cth), the foreign bribery offence under Division 70 of the Criminal Code Act 1995 (Cth) and associated Australian Government guidance, together with the ASX Corporate Governance Council's Principles and Recommendations and the Australian Institute of Company Directors' guidance on responsible corporate conduct. Aurora Labs has determined that, having regard to these frameworks and the heightened integrity expectations that apply to companies operating in the defence and dual-use sectors, abstaining from political contributions is the most appropriate position to protect the Company's reputation, independence and stakeholder trust.

All dealings with political parties, party officials, candidates or sitting members of parliaments which relate to Aurora Labs and its business activities must be conducted on an 'arm's length' and professional basis with a view to avoiding any perception that Aurora Labs is attempting to gain an advantage. Relevant Persons must take steps to ensure that Aurora Labs is not embroiled, directly or indirectly, in any political contribution, donation, sponsorship or comparable gesture, whether financial or in kind.

Any proposed engagement, sponsorship or activity that could reasonably be perceived as a political contribution must be referred in advance to the Company Secretary, who may consult with the Aurora Labs Board and external legal advisers as appropriate, before any commitment is made. The principal Australian legislative provisions and authoritative guidance informing this Section are listed in Appendix A.

## 7. Political Contributions by Relevant Persons

Political contributions by Relevant Persons must not be made to political parties, party officials, candidates or sitting members of parliaments without prior notification to the Company Secretary. The Company Secretary may direct a Relevant Person to refrain from making such a contribution where to do so may be perceived as undue or unlawful influence of a public official, or an attempt by Aurora Labs to gain (directly or indirectly) an undue or unlawful advantage.

In any event, contributions by Relevant Persons must be conducted on an 'arm's length' and professional basis, must be made in a personal capacity (and not on behalf of, or attributed to, Aurora Labs), and must be disclosed as required by applicable law.

## 8. Facilitation Payments and Kick Backs

Aurora Labs does not accept and will not make any form of 'facilitation payments' of any nature. It recognises that facilitation payments are a form of bribery that involves expediting or facilitating the performance of a public official for a routine governmental action.

Aurora Labs does not allow 'kickbacks' (i.e. a payment to a recipient as compensation or reward for providing favourable treatment or services to another party) to be made or accepted. It recognises that kickbacks are typically made in exchange for a business favour or advantage. Kickbacks can take many forms, but all feature some sort of collusion.

Aurora Labs recognises that, despite its strict policy on facilitation payments and kickbacks, Relevant Persons may face a situation where avoiding a facilitation payment or kickback may put their/their family's personal security at risk.

8.1. Under these circumstances, the following steps must be taken:

- (i) keep any amount to the minimum;
- (ii) ask for a receipt, detailing the amount and reason for the payment;
- (iii) create a record concerning the payment; and
- (iv) report this incident to the line manager and Company Secretary.

## 9. Charitable Contributions

Aurora Labs accepts (and indeed encourages) the act of donating to charities, whether of in kind services, knowledge, time, or direct financial contributions. However, Relevant Persons must be careful to ensure that charitable contributions are not used to facilitate and conceal acts of bribery and comply with local laws.

Relevant Persons must disclose significant charitable donations to the Company Secretary. Significant charitable donations are those that are more than A\$100 in one transaction. Relevant Persons should consider whether smaller charitable donations, on a regular and substantial basis, may have implications for Aurora Labs and should also be disclosed.

The Company Secretary will risk assess and analyse the implications of any significant charitable donations to Aurora Labs. The Company Secretary will maintain a record of disclosures, on a Charitable Donation Register. The Company Secretary will consider whether each donation could have adverse implications for Aurora Labs, particularly with regard to the relevant country's political donation and foreign influence regime.

## 10. Responsibilities of Relevant Persons

Relevant Persons must ensure that they read, understand, and comply with the information contained within this Policy, and with any training or other anti-bribery and corruption information that they are given.

All Relevant Persons are equally responsible for the prevention, detection, and reporting of bribery and other forms of corruption. They are required to avoid any activities that could lead to or imply a breach of this Policy.

A Relevant Person must notify their direct line manager or the Aurora Labs' Company Secretary if they have reason to believe or suspect that an instance of bribery or corruption has occurred or will occur in the future that breaches this Policy.

If any Relevant Person breaches this Policy, they may face disciplinary action and could face dismissal for gross misconduct. Further, Aurora Labs may have the right to terminate any contractual or other relationship with a Relevant Person who breaches this Policy.

## 11. Record Keeping

Aurora Labs intends to keep detailed and accurate records and will have appropriate internal controls and risk assessment mechanisms in place to illustrate compliance with this Policy.

## 12. How to Raise a Concern

If you suspect that there is an instance of bribery or corrupt activities occurring in relation to Aurora Labs, you are encouraged to raise your concerns at as early a stage as possible. If you're uncertain about whether a certain action or behaviour can be considered bribery or corruption, or if you have any other queries or concerns regarding this Policy, you should speak to your line manager, the Company Secretary, or any of Aurora Labs Board of Directors.

## 13. What To Do If You Are A Victim of Bribery or Corruption

It is important that you tell the Company Secretary or a member of the Aurora Labs Board of Directors, as soon as possible if you are offered a bribe by a Third Party, are asked to make one, suspect that this may happen in the future, or believe that you are a victim of another form of unlawful activity.

## 14. Protection

If you refuse to accept or offer a bribe, or you report a concern relating to potential act(s) of bribery or corruption, Aurora Labs understands that you may feel worried about potential repercussions. Aurora Labs will support any Relevant Person who raises genuine concerns in good faith under this

Policy, and in accordance with the Aurora Labs Grievance Policy (as amended), even if investigation finds that they were mistaken.

Aurora Labs will ensure that no Relevant Person suffers any detrimental treatment as a result of refusing to accept or offer a bribe or other corrupt activities or because they reported a concern relating to potential act(s) of bribery or corruption.

If you have reason to believe that you have been subjected to unjust treatment as a result of a concern or refusal to accept a bribe, you should inform your line manager, human resources, or the Company Secretary immediately.

## 15. Training and Communication

Aurora Labs will provide training on this Policy as part of the induction process for all new Relevant Persons. All existing Relevant Persons will also receive regular, relevant training on how to adhere to this Policy.

This Policy and Aurora Labs' zero-tolerance attitude will be clearly communicated to all suppliers, contractors, business partners, agents, and any third-parties at the outset of business relations, and as appropriate thereafter.

## 16. Responsibility For This Policy

Aurora Labs Board of Directors has overall responsibility for ensuring this Policy complies with Aurora Labs' legal and ethical obligations, and that all Relevant Persons comply with it.

The Company Secretary has primary and day-to-day responsibility for implementing this Policy, and for monitoring its use and effectiveness and dealing with any queries on its interpretation.

Management at all levels are responsible for ensuring Relevant Persons reporting to them are made aware of, and understand, this Policy and are given adequate and regular training on it.

## 17. Monitoring and Review

Aurora Labs Company Secretary is responsible for monitoring the effectiveness of this Policy and will review the implementation of it on a regular basis. They will assess its suitability, adequacy, and effectiveness.

Internal control systems and procedures designed to prevent bribery and corruption are subject to regular audits to ensure that they are effective in practice.

Any need for improvements will be applied as soon as possible. Relevant Persons are encouraged to offer their feedback on this Policy if they have any suggestions for how it may be improved. Feedback of this nature should be addressed to Aurora Labs Company Secretary.

Aurora Labs may amend this Policy at any time so to improve its effectiveness at combatting bribery and corruption.

## 18. Glossary of Terms

18.1. In this Policy:

18.1.1. **“Aurora Labs”** means Aurora Labs Limited Australian Company Number 601 164 505;

18.1.2. **“Group Company”** means Aurora Labs or any Related Bodies Corporate of Aurora Labs;

18.1.3. **“Policy”** means this Anti-Bribery & Anti-Corruption Policy, as amended from time to time;

18.1.4. **“Related Body Corporate”** has the meaning given to that term in the *Corporations Act 2001* (Commonwealth of Australia), being:

- (i) the holding company of a company or other body corporate;
- (ii) a subsidiary of a company or other body corporate; and
- (iii) a subsidiary of the holding company of a company or other body corporate.

18.1.5. **“Relevant Persons”** means persons who are expected or required to comply with this Policy, being:

- (i) the members of the Board of Directors of Aurora Labs;
- (ii) the Executive and senior management of Aurora Labs (including the Chief Executive Officer, the Company Secretary and other officers of the Group);
- (iii) all employees of Aurora Labs and any Group Company, whether permanent, fixed-term, part-time or casual;
- (iv) consultants, contractors, trainees, seconded staff, homeworkers, agency staff, volunteers, interns, agents and sponsors of Aurora Labs or any Group Company; and
- (v) any business partner, joint venture partner, distributor, introducer/referrer, contractor, supplier or agent of Aurora Labs or any Group Company who is contractually bound to comply with this Policy;

18.1.6. **“Third Party”** means any individual or organisation that a Relevant Person comes into contact with during the course of their work for a Group Company, and includes actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies, including their advisors, representatives and officials, politicians and political parties.

## Appendix A – Legislative and Regulatory Citations

This Appendix sets out the principal Australian legislative provisions, regulatory frameworks and authoritative guidance that inform this Policy. References are provided for the assistance of Relevant Persons and do not limit the application of any other applicable law. Citations are current as at the Effective Date of this Policy; Relevant Persons should verify the current form of any provision before relying on it.

### A.1 Foreign Bribery

*Criminal Code Act 1995 (Cth)*, Division 70 – Bribery of foreign public officials:

- **s 70.2** – offence of bribing a foreign public official;
- **s 70.5A** – failure of a body corporate to prevent foreign bribery by an associate (introduced by the Crimes Legislation Amendment (Combatting Foreign Bribery) Act 2024 (Cth));
- **s 70.5B** – adequate procedures defence available to bodies corporate;
- **Division 70 generally** – definitions of “foreign public official”, “benefit” and “business advantage”.

**Guidance:** Commonwealth Attorney-General's Department, *Guidance on adequate procedures to prevent the commission of foreign bribery* (issued under s 70.5B(3) of the Criminal Code).

### A.2 Domestic Bribery and Corruption

*Criminal Code Act 1995 (Cth)*, Division 141 – Bribery, and Division 142 – Corrupting benefits, in respect of Commonwealth public officials.

**State and Territory legislation:** for Aurora Labs as a Western Australian incorporated entity, the *Criminal Code Act Compilation Act 1913 (WA)* (in particular Chapter XIII – Corruption and abuse of office) applies in respect of State public officers, together with the *Corruption, Crime and Misconduct Act 2003 (WA)*.

### A.3 Political Donations and Electoral Disclosure

*Commonwealth Electoral Act 1918 (Cth)*, Part XX – Election funding and financial disclosure:

- **s 287** – key definitions, including “gift” and “disclosure threshold”;
- **s 302CA** – prohibition on receipt of gifts from foreign donors by political entities and political campaigners;
- **s 302D** – prohibition on certain gifts being used for federal purposes;
- **s 305B** – annual returns by donors;
- **s 314AC** – returns by donors to registered political parties.

**Western Australian equivalent:** *Electoral Act 1907 (WA)*, Part VI – Financial disclosure, administered by the Western Australian Electoral Commission.

## A.4 Foreign Influence and Foreign Interference

*Foreign Influence Transparency Scheme Act 2018 (Cth)* – registration of persons undertaking activities on behalf of a foreign principal, administered by the Commonwealth Attorney-General's Department.

*National Security Legislation Amendment (Espionage and Foreign Interference) Act 2018 (Cth)* – amending the *Criminal Code Act 1995 (Cth)* to introduce offences relating to espionage (Part 5.2) and foreign interference (Part 5.20).

## A.5 Money Laundering and Proceeds of Crime

*Criminal Code Act 1995 (Cth)*, Division 400 – Money laundering offences.

*Proceeds of Crime Act 2002 (Cth)* – confiscation of proceeds of unlawful activity.

*Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth)* – customer due diligence and reporting obligations administered by AUSTRAC.

## A.6 Corporate Governance and Directors' Duties

*Corporations Act 2001 (Cth)*:

- **s 180** – care and diligence;
- **s 181** – good faith, proper purpose;
- **s 182** – use of position;
- **s 183** – use of information.

**Guidance:** ASX Corporate Governance Council, *Corporate Governance Principles and Recommendations* (4th edition), in particular Principle 3 – Instil a culture of acting lawfully, ethically and responsibly.

Australian Institute of Company Directors, *Good Governance Principles and Guidance* and associated *Director Tools* resources addressing political donations and conflicts of interest.

## A.7 Whistleblower Protections

*Corporations Act 2001 (Cth)*, Part 9.4AAA – Protection for whistleblowers, including:

- **s 1317AA** – persons eligible for protection;
- **s 1317AAD** – confidentiality of whistleblower's identity;
- **s 1317AC** – victimisation prohibited.

*Public Interest Disclosure Act 2013 (Cth)* – in respect of disclosures concerning Commonwealth public officials.

## A.8 Sector-Specific Considerations

*Defence Trade Controls Act 2012 (Cth)* and *Customs Act 1901 (Cth)* (Regulation 13E and the Defence and Strategic Goods List) – controls on the supply, brokering and publication of military and dual-use goods and technology relevant to Aurora Labs' operations.

*Autonomous Sanctions Act 2011 (Cth)* and *Charter of the United Nations Act 1945 (Cth)* – sanctions regimes administered by the Australian Sanctions Office.

This Appendix is provided for reference only and does not constitute legal advice. Where the application of any provision is unclear, Relevant Persons should consult the Company Secretary, who may obtain external legal advice.

## Approval

**Prepared by:** Rebekah Letheby

**Date:** 28<sup>th</sup> May 2026

**Approved by:** The Board of Directors, Aurora Labs Pty Ltd

**Date:** 28 May 2026