

# ZIMMERMANN

## ANTI-BRIBERY AND CORRUPTION POLICY

### POLICY STATEMENT

At ZIMMERMANN, business is conducted to the highest standards of integrity, legality, honesty, respect and fairness when dealing with employees, customers and business partners.

Our expectations regarding integrity, legality, honesty and ethical conduct extend to our employees globally and all third parties engaged in commercial relationships with us.

As part of our commitment to legality and integrity, we have a zero-tolerance policy on bribery and corruption.

Accordingly, at ZIMMERMANN we:

- (a) conduct all business in an honest and ethical manner;
- (b) do not permit **bribery** or corrupt practices in any form (whether directly or indirectly);
- (c) will not be involved in financial transactions derived from or proposed to be used for criminal activities;
- (d) will resist any efforts made by others to improperly influence any decision-making process in order to achieve any personal or business advantage not legitimately due;
- (e) prohibit the making of facilitation payments as a means of doing business;
- (f) expect all of our agents, contractors, suppliers and each third party with which we do business to act in accordance with our company's anti-**bribery** and **corruption** policy, and implement and enforce their own effective systems to counter **bribery** and **corruption**; and
- (g) are committed to the continuous improvement of our anti-**bribery** and **corruption** processes and framework.

This policy has been reviewed by a cross-functional team and approved by the Executive team and Directors of Zimmermann Wear Pty Ltd.

All of our employees, agents, contractors, suppliers, and majority-owned subsidiaries are required to read, understand and comply with our anti-bribery and corruption policy, which is accessible on the ZIMMERMANN website.

## IMPLEMENTATION

The steps that ZIMMERMANN will take to implement this policy are outlined below. We conduct regular reviews of our implementation mechanisms to ensure they remain relevant to our business activities, risks identified, stakeholder expectations and international context.

- + Training deployed internally and in our supply chain to inform of our policy and expectations regarding business ethics
- + Incorporation of business integrity expectations in contracts with suppliers
- + Due-diligence process carried out before entering a commercial relationship with a third party
- + Provision of channels for our employees and third parties to raise complaints and seek advice
- + Audits conducted by an independent third party to assess the implementation of anti-bribery and anti-corruption principles in our supply chain

## REPORTING

As members of the UN Global Compact (UNGC) we have committed to the Ten Principles in the areas of human rights, labour, environment and anti-corruption and are required to report on our progress annually. The document we submit to the UNGC as part of this commitment tracks our progress in the implementation of this policy.

## OTHER RELEVANT DOCUMENTS

[Supplier Code of Conduct](#)