



The Rice Food Experts

Ricegrowers Ltd Anti-Bribery na Corruption Polisi

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INTRODUCTION

Wantaim ol niupela tingting na pasin bilong wok, Ricegrowers Limited, wantaim ol bisnis han bilong em na ol narapela wan-bisnis (“**SunRice Grup**”, “**yumi**”, “**bilong yumi**” o “**mipela**”), isave kamapim gutpela na helti kaikai we ol kastoma isave hamamas long em long olgeta hap insait long wol.

Olsem wanpela bisnis long wok bilong rais insait long wol, SunRice Grup iluksave long ol gutpela pasin bilong wok we kampani isave bihainim, wantaim tu pasin bilong bihainim Lo na em igat bikpela komitment long bihainim ol stretpela pasin bilong wok. Sapos bisnis ino bihainim ol dispela stretpela pasin, em iken lusim bikpela moni long ol fine o kisim bikpela mekim save long han bilong Lo, lusim wok bisnis na bungim ol narapela kain ol hevi tu. Moa yet, bikpela astingting em long soim gutpela na stretpela pasin bilong wok bisnis taim yumi wok wantaim ol kastoma, saplaia, konsuma, wokman/meri na tu komuniti.

1 Polisi Statement

- 1.1 SunRice Grup isanap strong long ‘zero tolerance’ polisi bilong em long lukim olsem imas nogat pasin giaman o stil o korupsen. Mipela bai givim bikpela mekim save long olgeta kain pasin or tingting bilong ol man/meri husait igat laik long wokim pasin giaman o stil o igat tingting long halivim ol lain ilaik mekim ol kainkain rong pasin.
- 1.2 Pasin bilong igat ‘zero tolerance’ imas stap long olgeta wan-bisnis, o ol lain husait iwok bisnis wantaim o iwokim bisnis bilong Sunrice Grup.

2 Han Bilong Dispela Polisi [Scope]

- 2.1 Dispela Anti-Bribery na Corruption Policy (“**ABC Policy**”) ikaramapim olgetea direkta, wokman/meri na ol wok kontrak bilong SunRice Grup, ol kampani na tu SunRice, CopRice, Australian Grain Storage (AGS), Riviana, SunFoods, Solrice, Aqaba Processing Company (APC), Rice Research Australia Pty Ltd (RRAPL) na Trukai, maski yu long Australia o long narapela kantri (we polisi ikolim olsem “**yu**” or “**bilong yupela**”).
- 2.2 Em ikarapim tu olgeta ol narapela ol bisnis, arasait long kampani, husait isave wokim wok bilong SunRice Grup, kain olsem ol distributa, agent na ol bisnis patna. SunRice Grup ilaikim olgeta ol bisnis, arasait long kampani, husait SunRice Grup isave wok bung wantaim, ol tu mas wok bihainim ABC Polisi na tu ol stretpela wok pasin bilong SunRice Grup.

3 Astingting

- 3.1 Astingting bilong dispela ABC Polisi em long:
 - (a) Halivim yu long save long ol gutpela astingting na komitmen bilong SunRice Grup long stopim o daonim pasin bilong giaman na pasin korupsen; na
 - (b) Lukautim yu long bihainim stret ol toktok insait long Anti-Bribery & Corruption polisi bilong SunRice Grup.
- 3.2 ABC Polisi em wanpela han bilong bikpela komitment we SunRice Grup igat long lukim olsem yumi mas wokim wok bisnis bihainim ol stretpela pasin insait long wol.

4 Tok Klia

Bribery: Transparency International itok klia long bribery olsem ‘*Pasin bilong givim, tok promis o kisim samting we ino bihainim gutpela pasin o tingting. Long kisim/givim ol samting ol man/meri save usim - ol kain samting olsem present, dinau moni o ol narapela ol samting long hamamasim ol yet o ol narapela lain.*

Corruption: Transparency International itok klia long korupsen olsem '*Pasin bilong paolim or bagarapim pawa wanpela igat long em long hamamasim ol yet.*

5 Ol Lo

- 5.1 SunRice Grup igat bikpela komitmen long bihainim olgeta Lo aninit long Anti-Bribery & Corruption polisi long olgeta hap em iwokim o ronim bisnis long em.
- 5.2 Ol bikpela Lo karamapim pasin bilong stil na giaman o korupsen:
 - (a) United States' Foreign Corrupt Practices Act 1977;
 - (b) United Kingdom's Bribery Act 2010;
 - (c) Chapter 4, Division 70 bilong Australian Criminal Code Act 1995 (Cth): na
 - (d) Ol narapela ol Lo we ikaramapim anti-bribery long ol kantri we SunRice Grup istap long em na SunRice Grup mas bihainim ol dispela ol Lo.

6 Pasin bilong Harim/Bihainim Tok

- 6.1 General Counsel bilong SunRice Grup bai go pas long ABC Polisi.
- 6.2 Wanwan menija igat wok long lukautim ol yet na ol ripot bilong ol na mas lukim olsem olgeta wokman/meri mas bihainim ABC Polisi na SunRice Grup Anti-Bribery na Anti-Corruption na tu ol toktok istap insait long ol narapela wankain polisi, long Seksen 8 lo tamblo, (bungim olgeta long kamapim "ABC Policies")
- 6.3 Yu bihainim gut na lukim olsem olgeta wokman imas bihainim Polisi na lukim olsem training mas kamap. Yu mas kisim save na bihainim gut ol ABC Polisi na bihainim ol rot bilong putim ripot we ABC Polisi itok klia long em. Yu imas skelim gut na ripotim ol rong pasin, o ol pasin u ting em ino stret aninit long Seksen 21, long tamblo.
- 6.4 Wanwan taim bai igat sekim o audit long ol ABC Polisi, long sekim sapos ol wokman ibihainim toktok insait long polisi.

7 Treining, Awareness na Implementation

- 7.1 Menijment long olgeta hap long kampani mas wok strong long skulim ol wokman bilong ol long dispela ABC Polisi, na ol imas stretim o putim sampela ol rot long halivim ol wokman long ol bai bihainim stret ol ABC Polisi.
- 7.2 Olgeta wokman bilong Sunrice Grup, narapla han o wan-bisnis, saplaia, kontrekta na bisnis patna bilong SunRice Grup mas save long tambu bilong Sunrice Grup, we itok tambu long pasin bilong giaman na stil. Toksave imas go long, pastaim long ol istatim wok bisnis bilong ol na long taim ol istatim wok wantaim kampani bihainim tasol Anti-Bribery and Corruption Policy for Dealings with External Parties Policy ("u ken ridim **External Parties Policy**") bilong SunRice Grup.
- 7.3 Menijment na ol narapela lain igat wok long lukim olsem olgeta wokman mas kisim gutpla skul o treining long save gut long ol ABC Polisi. Dispela bai halivim I halivim ol long wokim wok bilong gut. Ol ken wokim sampela moa ol skul o treining long halivim ol wokman, usait wok bilong ol iken bungim birua.
- 7.4 Menijment mas lukluk na skelim sapos ol wokman isave bihainim ol toktok insait long ol ABC Polisi.
- 7.5 Sapos yu laik save moa long wanem ol wok yu mas wokim, yu ken toktok wantaim Kampani Secretary o General Counsel bilong SunRice Grup.

8 OI Narapela Polisi

- 8.1 OI wokman mas ridim na bihainim olgeta toktok stap insait long ABC Policy na tu ol narapela polisi bilong SunRice Grup:
- (a) Code of Conduct;
 - (b) Working with Governments and Political Contributions and Activities Policy;
 - (c) Donations Policy;
 - (d) Dealings with External Parties Policy;
 - (e) Procurement Sourcing Policy
 - (f) Gifts, Benefits and Hospitality Policy;
 - (g) Sponsorship Policy; na
 - (h) Speak Up Policy.

POLICY REQUIREMENTS [Wanem OI Samting Yu Mas Mekim Long Bihainim Polisi]

9 Bribery em wanem samting?

- 9.1 Bribery em pasin bilong givim samting, giaman long tok promis, givim o kisim samting we bai wokim man o meri long bihainim pasin we ino stret long ai bilong wok bisnis bilong Sunrice Grup, we bai lukim man o meri ikisim halivim long hamamasim em yet.
- 9.2 OI samting we man ikisim o givim iken moni o ol narapela samting. Kain olsem ol gift o present, halivim igo long wok bilong politik o halivim igo long wok charity, dinau moni, pasin bilong bekim bek halivim, givim wok o bisnis o pasin bilong givim halivim o luksave we igat bikpela pei bilong em.
- 9.3 Maski sapos yu gat laik/tingting long givim bribe, dispela em iminim olsem yu asua pinis long ai bilong Lo.
- 9.4 Bribery ken karamapim sampela long ol dispela samting:
- (a) Man igat tingting long kisim namel man o agent long wokim ofa igo long narapela man iken wokim pasin bribery; o
 - (b) Ofa igo long narapela wanwok o femili, we iluk olsem bribery.

10 OI tambu bilong bribery

- 10.1 Itambu tru long givim, tok promis, peim, kisim, o askim long moni halivim o ol narapela samting. Kain olsem usim bilong ol prais samting:
- (a) Long kisim o halivim bisnis long neim bilong SunRice Grup, o pasin bilong usim stil pasin long neim bilong SunRice Grup na ol wan bisnis bilong Kampani;
 - (b) Long kisim, halivim na stretim ol legal ol wok bisnis long neim bilong SunRice Grup we ino bihainim stretpela pasin;

- (c) Tok oraitim ol ofa, mekim, askim o kisim peiment o ol narapela prais we ino stret, long winim bisnis o giamanim ol man long wokim bisnis disisen; o
 - (d) Usim neim bilong SunRice Grup o ol narapela party long sait bilong kisim win moni.
- 10.2 Sapos wokman o meri ikisim ofa bilong bribery, wokman mas tok nogat na ripotim hariap igo long ofis, we Section 21 itok klia long em.

11 Wei Bilong Peim Moni, Kisim Hait Moni na Pasin Bilong Haitim Stil Moni

- 11.1 Itambu tru long wokman long mekim 'Facilitation Payments' o halivim long painim wei bilong stretim o peim moni.
- 11.2 Transparency International itok klia olsem 'facilitation payment' (o halivim long painim wei bilong peim moni) em pasin bribery tu, o pasin bilong halivim/stretim, 'hariapim' o 'gris' moni; we man o meri ipeim long stretim o kisim luksave long Lo long halivim ol.
- 11.3 SunRice Grup ino tok oraitim ol man long makim maus bilong Kampani long wokim dispela kain pasin.
- 11.4 Sapos man o meri imekim dispela pasin long yu, yu mas tok nogat long dispela askim o ofa nay u mas ripotim hariap, we Section 21 itoksave long em.
- 11.5 Em impoten tru long yu mas luksave long wanem samting em pasin bilong "halivim long wokim peimen o givim moni" na wanem em ipasin bilong fos long kisim moni. Helt na seifti bilong yu em namba wan. Sapos yu kisim moni peiment long halivim yu long lukautim helt na seifti bilong yu, yu mas givim ful ripot bilong dispela peiment igo long Kampani Secretary o igo long General Counsel bilong SunRice Grup.
- 11.6 Itambu tu long givim hait moni. Hait moni em moni we man o grup (kain olsem wokman o meri bilong SunRice Grup) igivm igo long namel man (o agent) o maus-man bilong narapela man (kain olsem kastoma bilong SunRice Grup), na dispela namel man o maus-man, ino tokaut long ol bos. Yumi ken tok olsem ol iusim dispela pei moni long halivim ol long wokim wok bisnis.
- 11.7 Pasin bilong haitim stil moni em itambu tu. Pasin bilong haitim stil moni isave kamap taim man o meri o grup ihaitim sampela rot ol man isave usim long kisim moni. Bihain ol isave giaman olsem dispela moni em kamap long stretpela rot.

12 Public na Gavman Opisa

- 12.1 SunRice Grup itambu long muvim o givim ol samting (we igat bikpela pei bilong em) igo long Public Opisa, insait long kantri o long narapela kantri, sapos em igat hait tingting long kisim o holim passim bisnis o long kisim win moni o ol narapela samting long halivim em yet.
- 12.2 'Anything of value' o ol samting we igat bikpela pei bilong em, ikaramapim ol kain samting olsem moni o ol narapela samting we iwankain olsem moni na tu diskaunt, ol prais, usim bilong ol material, o masin samting, entertainment, dring, kaikai, trenspot, haus na tok promis bilong kisim ol gutpela samting long bihain taim.
- 12.3 Example (o tok bokis) bilong Public Opisa:
- (a) Ol opisa bilong gavman dipatment na ol gavman han (o agency);
 - (b) Ol kampani we State ibosim o ronim;
 - (c) Ol pablik International Organisation; na
 - (d) Ol memba bilong royal femili.

- 12.4 Dispela tambu ikaramapim tu ol man/meri usait ibin wok wantaim Gavman o long Pablik Opis na ol femili bilong ol politisen.
- 12.5 Sapos yu save olsem igat sampela kain wok iwok long kamap namel long ol pablik opisa, insait o arasait long kantri, yu mas toksave hariap igo long Generol Menija o ol narapela lain, we Seksen 21 itok klia long em, long kisim moa klia tingting o toksave.

13 Halivim Bilong Politik

- 13.1 Ol wok bilong ol politisen long nau o bihain taim, politikol pati na ol politikol grup.
- 13.2 Ol 'contributions' o moni halivim:
- (a) Cash moni halivim;
 - (b) Ol kain gift o prais olsem propeti samting o sevis; na
 - (c) Advetisim o ol promosen we itok oraitim politikol pati.
- 13.3 SunRice Grup iken tok oraitim doneisen o givim halivim igo long ol politikol pati, tasol em imas bihainim ol stretpela pasin bilong Lo na tu ol toktok aninit long polisi bilong Working With Governments and Political Contributions and Activities na dispela ABC Polisi.
- 13.4 Halivim igo long politiks mas noken kamap long bisnis unit o long level bilong divisen. Ol Bod of Direkta bilong Ricegrowers Limited imas tok oraitim pasterem olgeta halivim we bai go long ol politisen, bihainim olgeta stretpla rot aninit long polisi bilong Working with Governments and Political Contributions and Activities. Wanem kain halivim we ol politisen ikisim mas kamap ples klia, bihainim ol Lo na imas gat ripot bilong em istap long moni buk bilong Kampani.
- 13.5 Sapos halivim istap antap long mak bilong Federal Lo, ripot mas igo long Australian Electoral Commission long wanwan year bai ol iputim aut long website.

14 Wok Bilong Ol Politik

- 14.1 SunRice Grup igat polisi long bihainim olgeta local, state, federal na ol Lo bilong ol narapela kantri, long sait bilong givim halivim igo long wok politiks. Tasol SunRice Grup igat rait long tokaut long sanap bilong em long ol impoten samting olsem ol politikol kendidet, ol maus-man/meri na ol narapela ol gavman opisa na ol narapela politikol grup.
- 14.2 Sapos wokman ilaik wokim ol politik wok arasait long Kampani taim, ol mas lukaut gut. Ol wok politik bilong ol mas noken luk olsem ol iwok long wokim wok, makim SunRice Grup.

15 Donesen na Halivim

- 15.1 SunRice Grup igat bikpela komitment long halivim ol komuniti insait long wanem hap em istap long em. Ol wok bilong SunRice Grup itok klia long dispela ol wok komitment bilong Kampani. Tasol em impotent tu long lukim olsem ol wok-hat bilong SunRice Grup imas bihainim ol stretpela rot, aninit long Lo, na ino bilong hamamasim tingting bilong ol wanwan man.
- 15.2 Olgeta donesen bilong wok charity na halivim mas kamap, bihainim olgeta toktok insait long Donations Polisi bilong SunRice Grup.
- 15.3 Long sampela kantri, igat ol lain usait isave usim wok cheriti long hait na wokim pasin birbery. Yu mas lukaut gut long lukim olsem olgeta donesen bilong wok cheriti mas go long wok we ol imakim long em.

16 Present na Entertainment

- 16.1 Ol gift o present na entertainment (o pasin bilong hamamasim wanpla/narapla) iken kam aninit long pasin bribery tu sapos astingting bilong givim o kisim ol dispela samting ino bihainim stretpela rot o igat hait tingting long winim bisnis we bai hamamasim o halivim ol yet.
- 16.2 Pasin bilong givim bisnis prais o gift na wokim ol hamamas bung bilong Kampani ino save wankain long wanwan kantri, rejen na ol wok ples. Wanem samting we iluk orait long wanpela hap bai nonap luk gut long ai bilong ol lain long narapela hap. Olsem na ol opisa mas lukluk gut na skelim dispela ol pasin.
- 16.3 Igutpela moa sapos ol present o entertainment we ol wokman bilong SunRice Grup igivim o kisim, ino gat astingting bilong kamapim illegal bisnis o long hamamasim ol liklik lain. Givim o kisim bilong ol present na entertainment mas kamap, bihainim olgeta toktok aninit long Gifts, Benefits na Hospitality Polisi bilong SunRice Grup.

17 External Parties, including Distributors and Agents

[Ol arasait lain na tu distribute na namel man]

- 17.1 Sapos wanpela Kampani bilong SunRice Grup ilaik kisim ol arasait lain (or external party) long markim SunRice Grup na mekim wok bilong Kampani, emi impoten tru long mas gat kontrol we bai halivim ol arasait lain (or external party) long wokim wok bilong SunRice Grup stret. Ol arasait lain (o external parties) em ol agent, distributa, namel man, saplaia, purchaser o contrekta.
- 17.2 Olgeta wok bilong ol lain arasait (external parties) mas bihainim stret olgeta toktok o Lo aninit long External Parties Polisi. Aninit long agreement long wok bisnis wantaim SunRice Grup, wanwan arasait lain (or external party) mas tok orait long bihainim External Parties Polisi na dispela ABC Polisi bilong SunRice Grup.
- 17.3 Ol wok lain long arasait (external parties) usat iken bagarapim SunRice Grup, aninit long ol Anti-Bribery Lo, em ol lain usat isave wok long ol developing kantri o ol kantri usait ekonomi bilong ol iwok long kam antap (kain olsem planti long ol Middle East na Pacific kantri), o ol lain usat isave paitim tok long stretim bisnis o moni wantaim ol pablik o pravit sekta, makim maus bilong SunRice Grup long olgeta kantri (ol kain wok olsem bid long tender, paitim tok long givim wok kontrak, stretim bilong ol lease o license o halivim bilong transpot (kar) o clearance sevis bilong Customs).

18 Rot Bilong Winim Kontrak [Contract Tendering]

- 18.1 Sapos wanpela laik apply lo winim kontrak, SunRice Grup mas wok bihainim stret olgeta proses bilong tender. Em mas putim tender bilong olgeta sevis tender bihainim olgeta infomesen we Kampani ilaikim na em mas givim stretpela prais.
- 18.2 Olgeta proses bilong tender na procurement (o kisim bilong ol wok samting) mas bihainim tu olgeta toktok stap insait long Procurement Sourcing Polisi bilong SunRice Grup.

19 Wok Bisnis Namel Tupela Kampani Na Baim Bilong Kampani

- 19.1 SunRice Grup istap insait long sampela joint venture o patna bisnis.
- 19.2 Olgeta Joint Venture bisnis mas tok orait long bihainim olgeta toktok insait long dispela ABC Polisi na ol narapela ol wankain polisi bilong SunRice Kampani.
- 19.3 Sapos igat tingting long wok bung long kamapim joint venture, ol arasait lain (or external party) mas bihainim olgeta toktok insait long External Parties Polisi. Dispela iminim olsem ol arasait lain (or external party) mas pulamapim ABC Due Diligence Profile long Schedule 2 bilong External Parties Polisi pastaim long ol igo insait long statim wok kontrak. Sapos igat sampela rong ol lain ibungim long ABC Due Diligence Profile, ol wokman mas ripotim hariap igo long General Counsel bilong SunRice Grup. Ol kontrak wantaim ol joint venture patna mas igat tu wanem ol samting SunRice Grup ilaikim, aninit long ol toktok insait long ABC na External Parties Polisi.
- 19.4 Usat ol opisa bilong SunRice Grup usat isave wok wantaim joint venture patna mas putim ai gut long ol paol pasin bilong wok long ol narapela lain na tok aut long em.
- 19.5 Long sait bilong baim o kisim bilong bisnis, SunRice Grup mas lukluk na putim gut ol ripot bilong ol wok

painim aut long anti-bribery, long wanem kain ol bungim bilong bisnis (merger) o baim bilong bisnis, pastaim long tupla patna kampani itok oraitim wok kontrak.

20 Lukautim Bilong Moni

- 20.1 Imas gat gutpela wok redi na lukaut bilong olgeta pepa wok bilong moni bilong Kampani na tu ol narapela lain usat isave wokim wok bisnis wantaim SunRice Grup (kain olsem ol client, saplaia na bisnis kontek). Olgeta pepa wok tu mas stret .Man ken go long karabus, aninit long criminal Lo bilong Australia o ol narapela Lo bilong ol kantri we SunRice Grup istap long em, sapos ol pepa wok bilong moni ino stret.
- 20.2 Nogat wanpla ripot bilong moni mas stap arasait long moni buk.
- 20.3 Olgeta moni peiment ikam long opisa bilong SunRice Grup, wantaim tu ol present na entertainment, mas stap insait long moni ripot (expense report) na dispela ripot mas kisim tok orait bihainim tasol Expense Polisi.
- 20.4 General Counsel bilong SunRice Grup bai registerim olgeta present na entertainment, d o n e s e n i g o l o n g w o k politik na cheriti, sponsasip, ol arasait wokman (external parties) na ol narapela infomesen, we ilukim wok bilong SunRice Grup insait long wok politiks. Dispela register bai go long Corporate Management Team, olsem ripot, insait long wanwan quota, na igo long Finance na Audit Komiti bihain long olgeta tupela yia.

ROT O WEI BILONG PUTIM RIPOT NA AUTIM WARI

21 Givim Ripot

- 21.1 SunRice Grup igat ol wei long putim ripot, toktok na bringim ol ripot igo antap long ol bos we iken halivim olgeta lain long tok klia na hariap long stretim ol hevi, wari na ol rong pasin.
- 21.2 Sapos yu ting olsem pasin bribery or ol narapela rong pasin ibai kamap o ikamap pinis, yu mas hariap long ripotim.
- 21.3 Long namba wan taim yet, yu mas lukim Generol Menija o General Counsel bilong SunRice Grup. SApos yu nonap long lukim Generol Menija o General Counsel o yu no hamamas long halivim we yu kisim long stretim dispela hevi, yu ken haitim neim bilong yu na putim ripot igo long Speak Up Hotline, aninit long Speak Up Polisi bilong yumi.

Wei Bilong Putim Ripot Insait Long Ples Bilong Wok

Putim ripot igo long Integrity Opisa:

Neim: The SunRice Group's General Counsel
Fon: +61 (02) 9268 2074
E-mail: ABCreporting@sunrice.com.au
Box Namba: P.O Box Q166 QVB Post Shop

Wei Bilong Putim Ripot Arasait Long Ples Bilong Wok

Sapos yu no pilim gut long putim ripot igo long General Counsel bilong SunRice Grup o Generol Menija bilong yu, o yu ting bai gat sampela kros bai kamap, yu ken haitim neim bilong yu na toktok wantaim Speak Up Hotline bihainim tasol ol toktok na halivim aninit long Speak Up Polisi.

Ol ripot go arasait long Kampani ken go long dispela hait ripoting sevis:

Neim: WhistleBlower Security
Fon (**toll free**): 1800-263-215 (long Australia)
+604-922-5953 (long New Zealand)
+1 866 921 6714 (global number)

E-mail: sunrice@whistleblowersecurity.com

Website: www.whistleblowersecurity.com

1.1 Sapos yu no klia wantem samting em pasin bribery, rong pasin bilong peim moni, kisim hait moni na pasin bilong haitim stil moni o yu gat ol narapela askim, yu mas lukim General Menija bilong yu. Sapos yu nonap long lukim o kisim halivim bilong General Menija bilong yu o yu no hamamas long halivim yu kisim, yu ken surukim wari o ripot bilong yu igo long Kampani Secretary o General Counsel bilong SunRice Grup.

1.2 Ol saplaia, kontrak o ol narapela ol bisnis patna usat igat wari ol ilaik autim, aninit long ABC Polisi, mas lukim Kampani Secretary o General Counsel bilong SunRice Grup, o usim Speak Up Hotline.

2 Banis

2.1 Emi impoten tru long SunRice Grup, long ol opisa imas ripotim olgeta rong, aninit long ABC Polisi.

2.2 Wokman/meri bilong SunRice Grup:

(a) Usat igat laim long autim wari o ripotim rong bilong narapela wanwok; o

(b) Ino tok oraitim o kisim ofa o bribe,

Ken gat wari long sampela kain hevi bai bungim em. SunRice Grup ilaikim ol wokman long tok aut long rong, tasol long wankain taim, Kampani bai sapotim usat man o meri ikam wantaim gutpela bel long putim ripot, aninit long ABC Polisi, maski sapos ol ipainim aut bihain taim olsem ripot o wari bilong ol irong.

2.3 SunRice Grup igat komitment long lukim olsem ol man/meri noken bungim birua, sapos ol iles long stap insait long wokim ol rong pasin o sapos ol iputim ripot.

2.4 Ol kain birua olsem mekim save long wok-ples, ol man iwokim yu poret o wokim rabis pasin igo long yu. Sapos ol man iwokim dispela ol kain pasin long yu, yu mas ripotim hariap igo long General Menija bilong yu. Sapos General Menija ino stretim dispela hevi, yu ken bringim igo long SunRice Grup Kampani Secretary o General Counsel.

2.5 Ridim Speak Up Polisi bilong SunRice Grup long kisim moa save.

OL SAMTING YU MAS WOKIM

3 Yu Yet Mas Gat Klia Tingting Na Save Long Dispela Anti-Bribery na Corruption Polisi

3.1 SunRice Grup ilaikim olsem olgeeta wokman/meri bilong em, ol narapela arasait woklain (external parties) usat imakim Kampani long wokim wok bilong em, long ridim na mas save long olgeta toktok we istap insait long ABC Polisi na tu ol narapela polisi we Seksen 8 antap itoktok long em. Sapos yu gat sampela askim o laik save moa, long ol toktok insait long dispela ol polisi pepa, o long ol narapela toktok long sait bilong anti-bribery na compliance risk yu ken lukim SunRice Grup General Counsel.

4 Noken Poret

4.1 SunRice Grup itok klia pinis long komitment bilong em long olgeta wokman/meri imas bihainim olgeta Lo bilong anti-bribery na corruption. Ol wokman/meri mas noken brukim ol Lo, polisi o stretpela pasin bilong wok, na nogat man mas putim presa long ol o poretim ol long bihainim stret olgeta dispela gutpela pasin bilong wok. Ol wokman/meri mas gat pasin bilong tok tru na putim ripotim sapos ol narapela man o meri iwok long putim presa long ol o poretim ol.

5 Noken Ges

5.1 SunRice Grup ilaikim olgeta wokman/meri mas ripotim olgeta wari na rong pasin, o sapos ol man iwokim sampela rong aninit long ABC Polisi. Bai igat wok painim aut na mekim save bihainim ol

toktok insait long ABC Polisi.

6 Bihainim Pasin We Itru

- 6.1 SunRice Grup ilaikim olgeta wokman/meri, na tu ol arasait lain (external parties) usat iwokim wok bilong o makim maus bilong SunRice Grup, long bihainim pasin em istret olgeta taim. Ol wokman/meri na arasait lain mas bihainim olgeta astingting na toktok insait long ABC Polisi olgeta dei.

7 Wei Bilong Autim Wari Bilong Yu

- 7.1 Olgeta askin na wari mas bihainim stretpela proses o rot olsem Seksen 21 antap itok klia long em.

WANEM SAMTING IKEN KAMAP SAPOS YU NO BIHAINIM LO

8 Zero Tolerance O Strongpela Mekim Save

- 8.1 Ol samting yu mas klia long em:

- (a) Olgeta wokman/meri igat bikpela wok long givim trupla ripot o sapos ol iting igat sampela pasin bribery o korupsen iwok long kamap;
- (b) Bai gat wok painim aut bai kamap sapos wokman ino bihainim stret ol toktok insait long ABC Polisi wantaim tu mekim save. SunRice Grup bai rausim man o meri long wok sapos em iwokim rong; na
- (c) Man o meri ilaik stopim ol narapela man long putim ripot ken bungim wankain mekim save insait long ABC Polisi.

- 8.2 Wokman/meri bilong SunRice Grup usat ino bihainim o gat tingting long burukim ol toktok insait long polisi bilong Anti-Bribery na Corruption, o ol narapela ol polisi we Seksen 8 antap itok klia long em, ken kisim mekim save. Mekim save ken lukim wokman/meri ilusim wok wantem Kampani.

9 Mekim Save

- 9.1 Tamblo em sampela ol mekim save yu ken kisim sapos yu no bihainim ABC Polisi.

- 9.2 Pasin bilong no harim o bihainim tok:

- (a) Sunrice Grup ken kisim mekim save long han bilong polis o Lo;
- (b) Wok kontrak wantaim SunRice Grup bai nonap kisim tok orait o go het long wanem ol pepa wok ino bihainim ol stretpela rot; o
- (c) Neim na gutpela wok bilong Sunrice Grup bai go daon.

- (d) Wanwan man/meri

- 9.3 Pasin bilong yu no harim o bihainim tok:

- (a) Wokman o meri ken bungim, aninit long Lo bilong wanwan kantri, bikpela mekim save long kot o polis o sas moni;
- (b) Rausim long wok; o
- (c) Bagarapim gutpela neim bilong yu yet. Dispela ken wokim bai yu hart long

painim wok long narapela hap.

Ol woklain long arasait (External Parties)

9.4 Pasin bilong yu no harim o bihainim tok:

- (a) Sunrice Grup bai rausim wok bung wantaim yu; o
- (b) Sunrice Grup bai ripotim ol pasin bilong yu, sapos yu no harim tok, itok long ol lain usait isave go pas long Lo.

9.5 SunRice Grup ken kotim wokman o meri o ol lain iwok arasait long Kampani (external parties) sapos yu no bihainim ABC Polisi.

MONITORING AND REVIEW

- 9.6 Tamblo long Annexure A, long dispela ABC Polisi, em wanpela piksa e tok klia long ol wei e SunRice Grup isave lukluk, skelim na ripotim Anti-bribery na Korupsen.
- 9.7 Kampani bai sekim ol control system insait long ples bilong wok lukim olsem namba bilong ol wok lain usat ino save bihainim stretpela pasin bilong wok, imas noken planti.

TOKLUKAUT(RED FLAGS)

10 Tok Lukaut

- 10.1 Olgeta wokman/meri na ol wokman arasait long Kampani (external parties) usat imakim o wokim wok bilong SunRice Grup, mas ridim na kisim gut save long ABC Polisi na mas luksave long wanem samting em bribery na korupsen. SunRice Grup ilaik tok klia moa long sampela ol samting o pasin we iken kamapim bribery na korupsen. Ol wokman/meri na ol wokman arasait long Kampani (external parties) usat imakim o wokim wok bilong SunRice Grup mas luksave long dispela:
- (a) **Moni Peiment:** Wokman mas skelim gut sampla ol request o askim ikam long ol wanwan lain o kampani, usat iaskim Kampani long peim ol long cash moni igo long ol, long sevis we ol igivim. Sapos ol iaskim long cash moni, yu mas tok nogat long dispela askim na putim ripot hariap igo long Rijinol, Grup na Global ol opis, olsem Seksen 21 itok klia pinis.
 - (b) **Komisen Moni Peiment:** Komisen pei mas bihainim stret ol tok orait insait long coktrak agreement – kain olsem Agency Agreement. Wokman mas luksave long ol askim we komisen peiment iantap/bikpela tru, long wanem dispela tu ken kamapim pasin bribery.
 - (c) **Gris Moni o Prais:** SunRice Grup ilaik toksave ken long olgeta wokman/meri na na ol wokman arasait long Kampani (external parties) usat imakim o wokim wok bilong SunRice Grup, long sanap strong na tok nogat, sapos man ilaik grisim yu wantaim moni o ol narapela samting, long wokim wok bilong ol. Sapos yu no klia tumas, tok nogat long dispela gris moni o prais na ripotim.
 - (d) **Consultant Iqivim Tingting Bilong Em Long Makim Bilong Wanpela Wok Kontrak:** Yu mas lukaut sapos wanpela gavman opisa itok oraitim wanpela External Party (o arasait wok-lain) igo long SunRice Grup long – kain olsem long taim bilong tender proses. Sapos dispela ikamap, yu mas hariap long ripotim igo long Rijinol, Grup na Global opis we Seksen 21 itok klia long em.
- 10.2 Sampela ol samting we iken kamap:
- (a) Bai yu luksave long ol arasait wok-lain (external party) ino bihainim ol stretpela pasin long wokim wok o bai gat tokwin olsem ol ino wokim gut wok bisnis.
 - (b) Bai yu kisim save olsem wanpela o sampela arasait wok-lain (external party) igat neim long peim bribe o isave laikim ol lain long peim ol bribe.
 - (c) Arasait wok-lain (external party) istrong long em mas kisim komisen o sas moni pastaim long em iken sainim wok kontrak wantaim SunRice Grup o wokim wok bilong gavman opis bilong SunRice Grup.
 - (d) Arasait wok-lain (external party) iaskim yu long peim cash moni peiment na bai no laik long sainim stretpela komisen o fee agreement o long givim inoivo o risit bilong peiment.
 - (e) Arasait wok-lain (external party) iaskim long yu wokim peiment igo long narapela

kantri na ino kantri we em isave stap long o wok long em.

- (f) Arasait wok-lain (external party) iaskim long sampla moa komisen o fee moni long “stretim” sevis.
- (g) Arasait wok-lain (external party) bai strong long yu mas givim ol prais we igat bikpela pei blong ol, o long yu hamamasim ol wantaim ol expensiv ol entertainment samting pastaim long ol bai statim o go het long wok kontrak o mekim sevis.
- (h) Bai yu luksave olsem narapela wanwok isave igo wantaim wanpela saplaia olgeta taim long kaikai ol expensiv kaikai (dinner).
- (i) Arasait wok-lain (external party) bai askim olsem peiment mas “pasim ai o noken luksave” long sampela ol rong pasin.
- (j) Arasait wok-lain (external party) bai askim SunRice Grup mas givim wok o narapela ol gutpela samting igo long poro o wantok bilong ol.
- (k) Yu bai kisim inouis long arasait wok-lain (external party) we ino luk stret long ai bilong Kampani.
- (l) Arasait wok-lain (external party) bai strong long usim sait leta o pas, na bai les long putim gut ol toktok we ol itok oraitim pinis (agreement) long pepa.
- (m) Bai yu luksave olsem SunRice Grup ikisim inouis bilong komisen o fee peiment tasol moni mak bilong em iantap tru (tasol wok em ino bikpela).
- (n) Arasait wok-lain (external party) bai askim o laikim sevis bilong maus-man, namel man, consultant, distributa o saplaia usait SunRice Grup ino save long em.
- (o) Arasait wok-lain (external party) bai givim yu ol expensiv prais o bai hamamasim yu wantaim ol expensiv samting.
- (p) Bai yu luksave olsem arasait wok-lain (external party) isave wok wantaim Gavman o long Public Opis long bipo, o em haus-lain o femili bilong wanpela big neim politik man.

Annexure A



