



Star Combo Pharma Limited

ACN 38 615 728 375

Anti-corruption Policy

1. Introduction

Star Combo is committed to maintaining the highest standards of ethical conduct and integrity in all aspects of its operations. This includes a zero-tolerance approach towards corruption, bribery, and unethical behavior. This Anti-Corruption Policy outlines the Company's commitment to preventing corruption and bribery and provides guidelines for employees, contractors, agents, and all business partners to ensure compliance.

2. Scope

This policy applies to all individuals associated with the Company, including but not limited to employees, contractors, agents, consultants, distributors, suppliers, and other business partners.

3. Prohibited Conduct

The Company strictly prohibits any form of corruption, bribery, or unethical behaviour. This includes, but is not limited to:

- Offering, promising, giving, or receiving bribes, kickbacks, or improper payments to or from any individual or entity.
- Engaging in facilitation payments, even if they are customary in a particular country or region.
- Providing or accepting inappropriate gifts, hospitality, or entertainment that could influence business decisions.
- Misusing corporate resources or positions for personal gain or advantage.
- Falsifying records or accounts to hide or facilitate corrupt activities.

4. Responsibilities

4.1. Leadership and Management:

The senior management of the Company is responsible for leading by example and ensuring that anti-corruption policies are effectively communicated and implemented throughout the organization.

4.2. Employees and Associates:

All employees and associates are required to adhere to this policy, report any suspected violations, and actively participate in anti-corruption training and awareness programs.

5. Compliance Measures

5.1. Due Diligence:

The Company will conduct thorough due diligence on all business partners, including agents, distributors, suppliers, and contractors, to ensure they adhere to anti-corruption standards.

5.2. Training and Awareness:

Regular training and awareness programs will be conducted to educate employees and associates about anti-corruption policies, laws, and best practices.

5.3. Reporting Mechanisms:

The Company encourages the reporting of any suspected corrupt or unethical behaviour through established reporting mechanisms, ensuring confidentiality and protection against retaliation for whistleblowers.

5.4. Investigations and Disciplinary Actions:

Any reported or suspected violations of this policy will be promptly investigated. Individuals found in violation will be subject to disciplinary actions, which may include termination of employment or business relationship, and legal action if necessary.

5.5. Record Keeping:

Accurate and transparent records will be maintained to ensure accountability and traceability of all business transactions.

6. Legal Compliance

The Company will fully comply with all applicable laws and regulations related to anti-corruption, bribery, and ethical business conduct in all jurisdictions where it operates.

7. Communication

This policy will be communicated to all employees, associates, contractors, agents, and business partners in a language and format they understand.

8. Monitoring and Review

This Anti-Corruption Policy demonstrates the Company's unwavering commitment to ethical conduct, transparency, and integrity. By adhering to this policy, we collectively contribute to a corruption-free environment and uphold the reputation and values of the Company.

Approval:	Board of Directors
Approval Date:	21 May 2024
