

The background of the entire page is a dark navy blue. It is populated with numerous three-dimensional geometric shapes, including cubes, spheres, pyramids, and triangular prisms. These shapes are rendered in two primary colors: a vibrant cyan blue and a rich magenta purple. They are scattered across the frame, with some appearing larger and more prominent in the foreground, while others are smaller and recede into the background, creating a sense of depth and dynamic movement. The lighting on the shapes gives them a glossy, slightly translucent appearance.

Leading a future of connection and illumination

Anti-Bribery and Corruption Policy

Brambles

Revised: 1 July 2026
Version 5.0

ANTI-BRIBERY AND CORRUPTION POLICY

1. Introduction and Purpose of this Policy

- 1.1 One of Brambles Shared Values is that we always act lawfully, ethically and with integrity and respect for the community and the environment.

Bribery, corruption, trading in influence, influence peddling and the related improper conduct referred to in this Policy are not only serious criminal and civil offences but are also contrary to our Shared Values. Engaging in that conduct may result in Brambles or you incurring very large fines, legal and compliance-related costs, exclusion from business opportunities, regulatory sanctions, civil liability and jail sentences for individuals involved. It can also result in serious damage to Brambles' reputation and market value.

- 1.2 This Policy:

- (a) sets out our responsibilities, and the responsibilities of those working for us or in our behalf, in relation to bribery, corruption, trading in influence, influence peddling and related improper conduct,
- (b) provides information and guidance to those working for us or on our behalf on how to recognise and deal with bribery and corruption risks,
- (c) supports Brambles' commitment to maintaining effective systems, controls and procedures to prevent, detect, and respond to bribery and corruption risks, and
- (d) in this Policy, the terms "we", "our", "us" and "Brambles" refer to Brambles Limited and its group companies ("**Brambles**").

- 1.3 You must ensure that you read, understand and comply with this Policy.

2. Who is covered by the Policy?

- 2.1 This Policy applies to all individuals working for or on our behalf at all levels, including senior managers, officers, directors, employees (whether permanent, fixed-term or temporary), consultants, contractors, trainees, seconded staff, casual workers and agency staff, third party service providers, suppliers acting on our behalf, agents, sponsors, intermediaries, lobbyists, government relation advisers, customs brokers, or any other person associated with us, wherever located, collectively referred to as "Staff" in this Policy.

3. Our Policy: bribery, corruption, trading in influence and influence peddling are prohibited

- 3.1 We conduct our business lawfully, ethically and with integrity. Corrupt practices are unacceptable, and we take a zero-tolerance approach to bribery, corruption, trading in influence and influence peddling. We are committed to acting professionally, fairly and with integrity and respect in all our business dealings and relationships wherever we operate and implementing and enforcing effective systems to counter bribery and corruption. We will comply with the legal and regulatory framework in each country in which we operate. This means that you may not give, promise, offer, authorize, request, receive or accept anything of value, directly or indirectly, in order to obtain or keep business, to influence a decision, to reward improper conduct, to induce a breach of duty, to secure preferential treatment or to obtain any other improper business or personal advantage for Brambles, yourself or any other person. Nor may you solicit or accept a bribe, kickback, or other improper advantage of any kind. The prohibition in this policy applies whether the improper advantage is provided to or received from a government official, customer, supplier, business partner, intermediary or any other person.
- 3.2 We also expect those that we do business with to take a similar zero tolerance approach to bribery and corruption. Before entering into an agreement with any third party who will act on behalf of Brambles, Brambles will perform proper and appropriate due diligence and obtain from the third party appropriate assurances of compliance.
- Enhanced due diligence and appropriate approvals may be required before engaging with third parties who is expected to interact with government officials, public authorities, customers, suppliers or other decision-makers on behalf of Brambles.

- 3.3 This prohibition on bribery, corruption, trading in influence and influence peddling applies to offering, promising, giving, requesting, receiving or accepting anything of value, not just money. This includes, for example, business opportunities, jobs or internships, favourable contracts or contract terms, donations (including charitable donations), travel, gifts and hospitality, discounts, rebates, confidential information, sponsorships, entertainment, meals, invitations, personal favours or any financial or non-financial tangible or intangible benefit (defined as "undue advantage").
- 3.4 This Policy forms a part of Brambles' Code of Conduct and should be read in conjunction with the Anti-Bribery and Corruption Guidelines, the [Gifts and Hospitality Policy](#) and the [Speak Up Policy](#) which are posted on Walter, and the Brambles Mission and Values set out in the Code of Conduct, as amended and supplemented from time to time.

4. Responsibility for the Policy

- 4.1 This Policy has been approved by the Brambles Board and endorsed by our Chief Executive Officer in order to show Brambles' commitment to dealing with bribery and corruption risks and issues. The Brambles Executive Leadership Team has responsibility for monitoring compliance with this Policy and will report to the Brambles Board, through the Chief Executive Officer, on its monitoring activities.
- 4.2 Brambles has established a Brambles Ethics Group, which meets on a regular basis, and is responsible for monitoring the implementation of this Policy, overseeing compliance with this Policy generally, providing training on the requirements of the Policy, ensuring that it is adequately communicated to relevant parties, and supporting continuous improvement of Brambles Anti-Bribery and Corruption Programme.
- 4.3 The Brambles Ethics Group comprises the following individuals, any three of whom will constitute a quorum.
- Chief Legal Officer
 - Chief Compliance Officer
 - Global Compliance Officer, Anti-fraud and Corruption
 - Regional General Counsel, Americas
 - Regional General Counsel, Europe
 - Regional General Counsel, AMET
 - Regional General Counsel, APAC

The Brambles Ethics Group may from time to time add additional members to the Group on a temporary or permanent basis as particular or general circumstances may require.

- 4.4 Brambles Chief Compliance Officer has day-to-day responsibility for overseeing the implementation of this Policy, for monitoring its use and effectiveness and for reporting on those matters to the Brambles Ethics Group and the Brambles Board.
- 4.5 Management and senior staff at all levels are responsible for implementing this Policy in their respective workplaces and for ensuring those reporting to them are made aware of and understand this Policy.

5. What is bribery, corruption, trading in influence and influence peddling?

- 5.1 Corruption is the abuse of public or private office, position, authority or entrusted power for personal, commercial or other improper gain.
- 5.2 A bribe is an inducement or reward offered, promised, provided, requested, received or accepted, directly or indirectly, to a government official or a participant in a private commercial transaction in order to gain any commercial, contractual, regulatory, personal or any advantage by improper performance of a relevant function or activity. Whilst bribery of government officials or private individuals is equally prohibited under this policy, particular care needs to be taken when dealing with the former as anti-corruption laws are generally more onerous, with specific penalties applying, when government officials are involved.

The following are considered "government officials:"

- Officers, employees or representatives of any government, department, agency, bureau, authority, instrumentality, regulator, court, public body or public international organisation. A public international organisation is any organization formed by states, governments, or other regional or supernatural bodies. It would include, for example, the UN, the Organization of American States (OAS), and the International Red Cross,
- Persons acting on the government's behalf,
- Employees, officers or representatives of entities that are owned or controlled by a government,
- Candidates for political office, political parties and political parties officials,
- Persons performing a public function or public service, including within state-owned, state-controlled or, where applicable, privately owned entities performing public functions, and
- Any other person treated as a public official under applicable local law.

As a consequence, some parts of this Policy are stricter when relating to governments or government officials (for example, see section 6).

5.3 Examples of bribery include the following:

- Offering a bribe

You offer a potential client tickets to a major event on the condition that they agree to do business with us, favour us over a competitor or reduce their price.

This would be an offence as you are making the offer to gain a commercial and contractual advantage. Brambles may also be found to have committed an offence because the offer has been made to obtain business for us. It may also be an offence for the potential client to accept your offer.

- Receiving a bribe

A supplier gives your nephew a job but makes it clear that in return they expect you to use your influence in our organisation to ensure we continue to do business with them.

It is an offence for a supplier to make such an offer. It would be an offence for you to agree to this as you would be doing so to gain a personal advantage.

- Bribing a foreign official

You make a payment or arrange for the company to make a payment to a government official to ensure his or her department issues a favourable inspection report or issues a license, permit, approval, customs clearance or a pass or other document the company needs to do business.

The offence of bribing a foreign public official is committed as soon as the offer is made. This is because it is made to gain a business advantage for Brambles. Brambles may also be found to have committed an offence.

Bribing a government official in one country can result not only in a breach of local law but the laws of other countries as well. For example, bribing a foreign official could result in breaches of one or more of USA, UK, European Union, Australian or other applicable laws, even if the bribe takes place in a different country where Brambles does business. Cross-border approvals, digital communications, the use of intermediaries or a connection to other countries may also create legal exposure outside the country where the conduct occurs. The penalties for breaching these laws can range from substantial fines, imprisonment or other sanctions, as well as adversely impacting not only Brambles' reputation as well as that of its Staff.

In addition to direct payments of money or excessive gifts, other examples of bribery could include the following made at the direction, or for the benefit, of a government official or a commercial business partner: (a) excessive travel, meals, entertainment or other hospitality; (b) contributions to any political party, campaign or campaign official; (c) charitable contributions or corporate sponsorships; (d) employment, internships or work opportunities for relatives or associates; (e) discounts, rebates, credits or contract terms that are not commercially justified; or (f) confidential information or preferential access. Bribes also may not be offered, promised, requested, received, accepted or provided indirectly through business partners, service providers, consultants, lobbyists, intermediaries, customs brokers, distributors or other agents working on behalf of Brambles, including by way of secret commissions.

- 5.4 Trading in Influence and Influence Peddling is a form of corruption, and so is prohibited. It is the practice of using one's *influence* in government or connections with persons in authority to obtain favours or preferential treatment for another, usually (but not exclusively) in return for payment. It includes offering, promising, giving, requesting, receiving or accepting any undue advantage so that a person misuses, or claims they can misuse, their real or supposed influence over a government official, public authority, customer, supplier or other decision-maker to obtain an improper advantage for Brambles, a third party or themselves. This prohibition applies regardless of the influence is actually exercised, the influence is successful, or the relevant official or decision-maker is aware of the arrangement.

Legitimate lobbying, advocacy, legal advice or government relations activity are permitted when conducted transparently, lawfully, for a legitimate business purpose, and in accordance with applicable laws and Brambles' policies. If you are unsure whether an activity may create trading in influence or influence peddling risks, you must contact the Legal, Ethics and Compliance Team before proceeding.

- 5.5 Avoid Conflicts of Interest

Staff may place themselves in a position where they could breach anti-bribery or corruption laws if they have a conflict of interest, particularly in relation to contracts, tenders, procurement decisions, supplier selection, customer negotiations or interactions with government officials. These conflicts arise where your personal interests may conflict with the interests of Brambles. Examples of areas where a conflict might arise include a personal interest in a contract, whether direct (for example where you are a counterparty to a contract) or indirect (for example where you have an interest in the counterparty to the contract by way of share ownership or a close relative who works for, or has an ownership interest in, the counterparty and will benefit, directly or indirectly, from the contract), employment outside of Brambles, the use of information confidential to Brambles in a personal transaction, or seeking or accepting gifts or entertainment beyond the guidelines set out in this policy and [Brambles' Gifts and Hospitality Policy](#).

As a result, you should not engage in activities that involve, or could appear to involve, a conflict of interest. If you become aware that Brambles is considering or doing business with an entity or individual with whom you have a personal or financial relationship, you must remove yourself from such decisions or supervision and disclose the relationship to your line manager or any member of the Legal, Ethics and Compliance or Human Resources Teams. If you are not sure whether or not a particular situation may give rise to a conflict of interest, contact your line manager or any member of the Legal, Ethics and Compliance or Human Resources Teams.

- 5.6 Gifts and Hospitality

Before offering or accepting gifts or hospitality of any kind, you must ensure that they are not bribes, kickbacks, undue advantages, trading in influence or influence peddling, that they are modest, reasonable, proportionate and appropriate and that their purpose is legitimate, for example, to improve our company image, present our products and services, or establish or maintain business relations. And, before offering or accepting gifts or hospitality of any kind, please review and comply with [Brambles' Gifts and Hospitality Policy](#). If you have any questions about gifts or hospitality, please contact a member of the Brambles' Ethics Group.

6. Political Donations and Others

- 6.1 We do not make contributions to political parties, organisations, campaigns, campaigns officials or individuals engaged in politics.
- 6.2 Charitable donations, communities' investments and sponsorships must not be used with the purpose of bribery, corruption, trading in influence, influence peddling or any other improper advantage. Any such contributions must be made transparently, with a legitimate purpose, accurately recorded and in accordance with applicable internal policies and approval requirements.

7. Facilitation Payments

- 7.1 A facilitation payment is a payment or other advantage provided to secure or expedite a routine, non-discretionary government action by an official. These types of payments are typically demanded by low-level officials in exchange for providing a service that is ordinarily and customarily performed by the official, such as processing permits, licences, customs documentation, inspections or other government paperwork. ***At Brambles, we do not make facilitation payments.***
- 7.2 A published, well-documented expediting fee paid directly to a government or state-owned entity is not typically considered a facilitation payment under anti-bribery laws. For example, paying a fee to expediate a passport application, deliver a package or process government paperwork such as visas, is not considered a facilitation payment if those fees are payable to the government entity—not an individual—and are published openly. If you have a question as to whether a payment is permissible, please contact a member of the Brambles Ethics Group.

8. Imminent Threats

- 8.1 If there is an imminent threat to your health or safety, you may provide a payment or other advantage to avoid immediate harm. Loss of business to Brambles, delay, inconvenience, commercial pressure or the risk of financial loss is **not** an imminent threat. Whenever possible, you should first consult with and obtain authorization from the Brambles Ethics Group before making payment. However, if prior approval is not possible, you must report the payment within 48 hours of its occurrence to the Brambles Ethics Group as any payment made due to an imminent threat must be accurately recorded, including the amount, recipient, circumstances, reason for the payment and any supporting documentation. The Brambles Ethics Group will review the circumstances and determine whether any further action, reporting, remediation, or control enhancement is required.

9. Your responsibilities

- 9.1 The prevention, detection and reporting of bribery, corruption, trading in influence, influence peddling and other forms of corruption or improper conduct are the responsibility of all those working for us or under our control. All Staff are required to avoid any activity that might lead to a breach of this Policy, whether by Staff or by a business partners, service provider, consultant, intermediary, agent, supplier, contractor, or other agent or third party acting for or on behalf of Brambles.
- 9.2 You must notify your line manager or the Brambles Ethics Group as soon as possible if you believe or suspect that a breach of or conflict with this Policy has occurred, may have occurred, or may occur in the future.
- 9.3 Employees are expected to cooperate fully and honestly with any review, audit or investigation relating to potential bribery, corruption, trading in influence, influence peddling or related misconduct. Employees must preserve relevant documents, records and communications and must not conceal, alter, destroy, or falsify information. Any employee who breaches this Policy will face disciplinary action, which could result in dismissal for misconduct. Brambles may also terminate relationship with third parties who breach this Policy or equivalent anti-bribery and anti-corruption obligations such as contractual agreements.

10. Record keeping

- 10.1 We must keep financial records and have appropriate internal controls in place which will evidence the business reason for making payments to third parties.
- 10.2 You must keep a written record of all hospitality or gifts accepted or offered, both given to and received by you. The records will be subject to review by the Brambles Ethics Group.
- 10.3 You must ensure all expense claims relating to hospitality, gifts or expenses incurred to third parties are submitted in accordance with our applicable expenses policy and specifically record the reason for the expenditure.
- 10.4 All accounts, invoices, and other documents and records relating to dealings with third parties, such as clients, suppliers, business contacts, consultants, intermediaries, agents, customs brokers, lobbyists, government relations advisers and other representatives, must be prepared, itemized, and maintained with strict accuracy and completeness. No accounts must be kept "off-book" to facilitate or conceal improper payments, and personal funds must not be used to accomplish what is otherwise prohibited by this Policy.
- 10.5 Payments to third parties must be supported by appropriate documentation, including a legitimate business purpose, evidence of services provided, appropriate approval, and payment details consistent with the relevant contract or purchase order.
- 10.6 You must not create, approve or process any false, misleading, incomplete or artificial record, invoice, purchase order, expense claim, payment description, contract or approval request.

11. How to raise a concern

- 11.1 You are encouraged to raise concerns about any issue or suspicion of malpractice or violations of this Policy at the earliest possible stage.
- 11.2 If you are unsure whether a particular act constitutes bribery, corruption, trading in influence, influence peddling or another form of improper conduct, or if you have any other queries, these should be raised with your line manager and/or the Brambles Ethics Group. Alternatively, if you are uncomfortable speaking with them, or concerned after doing so, you should (anonymously if you prefer) contact the Speak Up hotline.
Reports of suspected bribery, corruption, trading in influence, influence peddling or related misconduct will be assessed and, where appropriate, investigated and remediated in accordance with Brambles' Speak Up, investigation and disciplinary processes.

12. What to do if you are a victim of bribery or corruption

- 12.1 It is important that you tell your line manager and/or the Brambles Ethics Group 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, are asked to provide or receive an undue advantage, or believe that you are a victim of another form of unlawful or improper activity.

13. Protection

- 13.1 Staff who refuse to accept or offer a bribe, or those who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. As set out in the Brambles Speak Up Policy, which is part of the Code of Conduct, we encourage openness and will support anyone who has reasonable grounds to raise suspicions of bribery, corruption, trading in influence, influence peddling or related misconduct, even if they turn out to be mistaken.
- 13.2 We will not tolerate retaliation or detrimental treatment of any kind as a result of any Staff member refusing to take part in bribery, corruption, trading in influence, influence peddling or related misconduct, or because he or she reports his or her suspicion, based on reasonable grounds, that an actual or potential bribery or other corruption offence has taken place, or may take place in the future. Any Staff member found to have retaliated against another for refusing to take part in bribery, corruption, trading in influence, influence peddling or related misconduct or for reporting his or her suspicion, based on reasonable grounds, that an actual or potential bribery, corruption, trading in influence, influence peddling or related misconduct or other corruption offence has taken place or may take place in the future will be subject to

appropriate discipline, up to and including termination of employment. Retaliation or detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should either inform the Brambles Ethics Group immediately or use the Speak Up hotline.

14. Training and communication

- 14.1 Training on this Policy shall form part of the induction process for all new Staff. Staff that may be more likely to be exposed to bribery or corruption risks given their role and position will receive appropriate training on how to implement and adhere to this Policy.
- 14.2 Our zero-tolerance approach to bribery, corruption, trading in influence and influence peddling will be communicated to suppliers, contractors and business partners at the outset of our business relationship with them and as appropriate thereafter.

15. Monitoring and review

- 15.1 The Brambles Ethics Group will monitor the effectiveness and review the implementation of this Policy regularly considering its suitability, adequacy and effectiveness. Improvements identified will be made as soon as possible. Internal control systems and procedures will be subject to regular audits to provide assurance that they are effective in countering bribery and corruption. Internal control systems and procedures will be subject to regular audits, monitoring and/or testing to provide assurance that they are effective in countering bribery and corruption.
- 15.2 The Chief Legal Officer or the Brambles Chief Compliance Officer will report to the Brambles Board on its monitoring of the Policy and any material breaches of the Policy and submit to the Board any proposed amendments to the Policy.
- 15.3 Brambles will monitor relevant legal and regulatory developments, including implementation of anti-corruption laws and guidance in jurisdictions where Brambles operates. Where appropriate, Brambles will update this Policy, related procedures, training and controls to reflect those developments.
- 15.4 All Staff are responsible for the success of this Policy and should ensure they use it to disclose any suspected breach or wrongdoing.
- 15.5 Staff are invited to comment on this Policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to the Brambles Chief Compliance Officer who will communicate this to the Brambles Ethics Group.