



AMBERTECH LIMITED ANTI-BRIBERY AND CORRUPTION POLICY

1. Objective

Purpose

Ambertech Limited (Ambertech or Company) is committed to maintaining a high standard of integrity, investor confidence and good corporate governance. The company takes a zero-tolerance approach to Bribery and Corruption and is committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate and to implementing and enforcing effective systems to counter Bribery and Corruption.

The purpose of this Anti-Bribery and Corruption Policy (Policy) is to ensure Ambertech complies with all applicable anti-bribery laws; to outline the Company's approach and requirements in relation to gifts and benefits, to help mitigate conflicts of interest and the risk of Corruption and associated reputational risks for the Company and its people.

This Policy forms part of Ambertech's overall risk management framework and is publicly available via the 'Corporate Governance' section of the Company's website.

References to Ambertech include any of its wholly owned subsidiaries.

Scope

This Policy applies to all Ambertech's directors, executives, employees, contractors and suppliers (including their employees) and a relative or dependent of these persons.

When travelling overseas you are subject to the laws of the country you are in as well as the requirements of this Policy. Where a country has specific Bribery and Corruption laws which are of a lesser standard to this Policy, this Policy prevails.

Definitions

In this Policy, the following definitions apply:

"Bribe" means a benefit given or offer sought or made with the intention of influencing a person to take or not to take a specific action.

"Corruption" means the misuse of entrusted power for personal or private gain. Corruption may include bribery, embezzlement, theft, fraud, extortion, conflict of interest and illegal charitable and/or political contributions.

2. Anti-Bribery and Corruption

Ambertech has zero tolerance for all forms of Bribery and Corruption.

Principles and Requirements

Regulatory Requirements:

In Australia, individuals and companies may be held criminally liable for:

- Bribing an Australian government or foreign public official; or,
- Corruptly giving rewards to private sector employees or agents, and private sector employees or agents corruptly receiving rewards to show favour in their employer's or principal's business.

A company can also be held criminally liable for a 'failure to prevent' foreign Bribery offence by an Associate – and this offence is one of absolute liability meaning that the company can be found guilty even where it did not know or authorise the conduct.

The offence of foreign Bribery includes attempts to Bribe candidates for public office, not just current officeholders; captures personal benefits, rather than only business benefits, that are offered with the intention to influence a foreign public official; and, includes Bribes that might otherwise be disguised as legitimate transactions.

Policy Requirements:

Under this Policy you must:

- read, understand and comply with this Policy
- not offer, promise, give, accept, request, suggest or authorise a Bribe or Corrupting benefit (including secret commissions or payments, facilitation payments or kickbacks), whether directly or indirectly, to Commonwealth public officials, Australian State or Territory public officers, officials, current foreign officeholders or candidates for foreign public office or private sector employees or agents
- not give or accept gifts or benefits that will compromise, or appear to compromise, your integrity and objectivity in performing your duties
- not give or accept gifts or benefits that cause, or appear to cause a conflict of interest
- decline gifts and/or benefits worth A\$250 or more (unless an exception applies)

Business Expenditure:

All expenditure on behalf of Ambertech must be appropriately authorised in line with the relevant corporate policy. You must also keep appropriate records in line with the requirements outlined below. If you have any concerns regarding a proposed transaction, or if someone is applying influence in relation to the proposed transaction, seek advice from your manager, or from the COO or MD.

Gifts and Entertainment:

Ambertech does not allow gifts or hospitality to be given to, or received from, Commonwealth public officials, foreign public officials, other government officials or public service employees, except in

accordance with this Policy. Ambertech allows reasonable, proportionate and bona fide gifts or hospitality to a maximum of A\$250 to be given to, or received from, our suppliers or any individual or organisation our suppliers meet during their work or engagement with us, for the purposes of:

- establishing or maintaining good business relationships
- improving or maintaining our image or reputation
- marketing or presenting our Company's products or services effectively.

Gifts and genuine hospitality and entertainment expenditure that is reasonable and proportionate is allowable provided it complies with the following:

- made for the right reason – it should be clearly given as an act of appreciation or common courtesy associated with standard business practice
- no obligation or expectation – it does not place the recipient under any obligation and/or expectations are not created by the giver or an associate of the giver or have a higher importance attached to it by the giver than the recipient would place on such a transaction
- made openly – if made secretly and undocumented then the purpose will be open to question
- reasonable value – its size is small and in accordance with general business practice
- appropriate – its nature is appropriate to the relationship
- at “arm’s length” – all transactions/ gifts should be at an “arm’s length” basis with no special favours and no special arrangements
- legal – it complies with relevant laws

Non-Compliance

Compliance with this policy is a requirement of our Code of Conduct and your employment or service contract with the Company. A failure to comply with this Policy may lead to disciplinary action, up to and including dismissal. You must notify your manager or the COO or MD as soon as possible if you believe or suspect that a conflict with, or breach of, this Policy has occurred, or may occur in the future.

If you are unsure whether a particular act constitutes Bribery or Corruption, or if you have any other queries or concerns, these should be raised with your manager or the COO or MD. If you are not comfortable, for any reason, with speaking directly to your manager, Ambertech has a Whistleblower Protection Policy which affords certain protections against reprisal, harassment or demotion for making the report.

3. Responsibilities

Board of Directors

The Board of Directors is responsible for overseeing the implementation and enforcement of this policy and ensuring its alignment with the ASX Corporate Governance Principles.

Management

Management is responsible for promoting adherence to this policy within their areas of control.

4. Training and Awareness

The Company will provide training to ensure that all employees, directors, and contractors understand the policy and their obligations under it. Ongoing education will be provided to reinforce the importance of ethical behaviour and compliance.

5. Policy Review

This policy will be reviewed periodically to ensure it remains relevant and effective. Updates will be made as necessary to reflect changes in legislation, regulations, or business practices.