

Anti Bribery and Anti-Corruption Policy

PassRite Driving Academy Ltd is a quality focused company committed to conduct all of our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our dealings wherever we operate. It is our policy to comply with the New Zealand Anti Bribery Act 2015.

This policy applies to individual employees, suppliers, consultants, contractors or any other people or bodies associated with PassRite Driving Academy Ltd,

To achieve our commitment, we expect compliance of the following code of conduct from all our clients, associates, business partners and suppliers:

- Never engage in any form of bribery, either directly or through any third party.
- Never offer or make an improper payment, or authorise an improper payment (cash or otherwise) to any individual, including any local or foreign official anywhere in the world.
- Never attempt to induce an individual, or a local or foreign official to act illegally or improperly.
- Never offer, or accept, money or anything of value, such as gifts, kickbacks or commissions, in connection with the procurement of business or the award of a contract.
- Never offer or give any gift or token of hospitality to any public employee or government official or representative if there is any expectation or implication for a return favour.
- Never accept any gift from any business partner if there is any suggestion that a return favour will be expected or implied.
- Never facilitate payments to obtain a level of service that one would not normally be entitled to
- Never disregard or fail to report any indication of improper payments to the appropriate authorities.
- Never induce or assist another individual to break any applicable law or regulation.

This policy does not prohibit the following practices:

- Giving and receiving ordinary and usual business hospitality and entertainment and promotional or other business expenditure which seeks to improve the image of the company and its services or to establish or cement cordial relations is recognised as an established part of doing business. Our company's policy does not prohibit reasonable and proportionate hospitality and promotional or other similar business expenditure (offered or received) intended for any of the foregoing purposes.

Raising Concerns

Employees will be encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. No employee will suffer any detriment as a result of raising genuine concerns about bribery, even if they turn out to be mistaken.

The effectiveness of this policy will be regularly reviewed and control systems and procedures will be subject to audit under internal audit process.

All employees are responsible for the success of this policy and should ensure they use it to disclose any suspected concerns or wrongdoing to Managing Director. Failure to comply with this policy may result in disciplinary action, including dismissal (employees), or appropriate sanctions (business partners) in addition to civil or criminal charges. This policy has been approved and adopted by the Board of PassRite Driving Academy Ltd.

Summary of Code of Conduct:

1. Never engage in any form of bribery, either directly or through any third party.
2. Never offer or make an improper payment or authorise an improper payment (cash or otherwise) to any individual, including any local or foreign official anywhere in the world.
3. Never attempt to induce an individual, or a local or foreign official to act illegally or improperly.
4. Never offer, or accept, money or anything of value, such as gifts, kickbacks or commissions, in connection with the procurement of business or the award of a contract.
5. Never offer or give any gift or token of hospitality to any public employee or government official or representative if there is any expectation or implication for a return favour
6. Never accept any gift from any business partner if there is any suggestion that a return favour will be expected or implied.
7. Never facilitate payments to obtain a level of service which one would not normally be entitled to. 8. Never disregard or fail to report any indication of improper payments to the appropriate authorities.
9. Never induce or assist another individual to break any applicable law or regulation.