

ANTI-BRIBERY AND INTEGRITY POLICY

VG-ETH-008-PUB



PURPOSE

This policy prohibits bribery, secret commissions and improper influence in Valhalla's commercial, government, university, research and community relationships.

PUBLIC COMMITMENT

- Bribes, kickbacks, secret commissions and facilitation payments are prohibited.
- Due diligence and approval should be proportionate to the value and risk of the relationship or payment.
- Sponsorships, grants, gifts and hospitality must have a legitimate purpose and accurate records.

STATUS	Published
POLICY OWNER	Managing Director
PROPOSED APPROVER	Valhalla Board
PUBLICATION	Published v1.0

1. Application and non-negotiable rule

Valhalla is an Australian-based private company. This document is applied in a practical and adaptable manner, with controls suited to the nature and risk of the activity. The Managing Director may set or adjust implementation arrangements, subject to law, contracts and matters reserved to the Valhalla Board. Ordinary operations may proceed within approved budgets and delegations. A significant departure from ordinary operations, material change, unusual commitment, new jurisdiction or matter outside approved authority must be documented and approved before implementation, including by the Valhalla Board where required.

Proportionate implementation does not soften the core prohibition: no person acting for Valhalla may offer, promise, give, request or accept anything of value intended to improperly influence a decision, reward improper conduct or create a concealed obligation.

2. Prohibited conduct

- cash bribes, kickbacks, secret commissions, sham fees, inflated invoices or off-book payments;
- facilitation payments to accelerate routine government action;
- using an intermediary, charity, university account, community entity or family member to provide an improper benefit;
- false descriptions, split invoices or incomplete records intended to conceal the nature of a payment; and
- retaliation against a person who refuses to participate in, or reports, suspected misconduct.

3. Gifts and hospitality

Gifts and hospitality should be modest, infrequent, transparent and connected to a legitimate business purpose. Cash and cash equivalents are not permitted. Benefits involving a public official, tender, approval, dispute or other sensitive decision should be declined or referred to the Managing Director before being offered or accepted.

4. Sponsorships, grants and donations

Funding and sponsorship must not be used to purchase improper access, favourable treatment, confidential information or a predetermined research outcome. Arrangements should have a genuine purpose, identifiable beneficiary, written terms and payment to an account in the organisation's name unless another approach is independently justified and approved.

The Financial Sponsorship and Funding Policy applies to payment structures, indirect costs and Board approval thresholds.

5. Due diligence and approvals

The level of due diligence should reflect the country, counterparty, ownership, government connections, value, payment method and nature of the services or benefits. Lower-risk arrangements may require only basic identity, reputation and bank-account checks. Higher-risk arrangements may require specialist advice or Board consideration.

6. Political activity and public officials

Valhalla does not make political contributions unless specifically approved by the Board and lawful in the relevant jurisdiction. Employment, internships, research roles, travel or other benefits must not be offered to influence a public decision.

7. Records and reporting

Payments and benefits should be recorded accurately and supported by documents appropriate to their value and risk. Suspected bribery, improper influence or falsified records should be stopped where possible and raised promptly with the Managing Director or a director.

Related documents

- Code of Conduct and Ethics
- Conflicts of Interest Principles
- Partnership and Sponsorship Acceptance Principles
- Financial Sponsorship and Funding Policy

Document control and approval

Public reference	VG-ETH-008-PUB	Version	1.0
Status	Published	Publication	Published v1.0
Policy owner	Managing Director	Proposed approver	Valhalla Board
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Review cycle	Bi-Annually or as board requires	Review date	August 12th 2028
Internal source	Anti-Bribery, Gifts, Hospitality, Sponsorships and Political Contributions Policy		

PUBLICATION CONTROL Published v1.0. This is the current website publication. Procedures may be adapted proportionately, but any substantive amendment to the published commitments requires controlled review, approval and versioning.