Anti-bribery and Corruption Policy

What is the objective of this Policy

This Policy sets out how Origin manages the risk of Bribery and Corruption.

The objectives of this Policy are to:

- establish processes that minimise the risk of Bribery or Corruption; and
- ensure any suspected or actual Bribery or Corruption is identified and reported.

1. Who this applies to

This Policy applies to all Directors, employees and people working for Origin under a contract or consultancy agreement (**Origin Personnel**) whenever they are involved in Origin's business activities.

Individuals and corporate entities associated with or acting on behalf of Origin, including agents, contractors and suppliers (**Associates**), are expected to comply with this Policy where relevant, or with an equivalent policy managing Bribery and Corruption risks.

2. Requirements

You must not be involved in, or conceal, any kind of Bribery, Corruption, Facilitation Payment, Secret Commission or money laundering.

Identifying and Managing Bribery & Corruption Risks

Origin's business units and corporate functions must:

- undertake Bribery and Corruption risk assessments to identify and assess Bribery and Corruption risks within their business areas;
- implement appropriate procedures and controls to prevent Bribery and Corruption based on the identified risks;
- in line with the requirements of Origin's risk management framework, continue to manage, monitor and evaluate the identified risks and controls, including responding to events, relationships or business activities that could increase or alter the risk exposure (**Risk Event**).

As Origin Personnel, you must:

- understand Bribery and Corruption risks and perform any controls associated with your role and business activities; and
- tell your manager if you become aware of or identify any new Risk Event.

Raising Concerns

If you become aware of any actual, suspected or alleged Bribery or Corruption, you must tell your manager or raise your concern in accordance with Origin's Speaking Up Standard or Whistleblower Policy.

If you have made, or aware of a payment made to protect against perceived or actual immediate danger to personal safety or liberty, you must report it at the first available opportunity to the relevant Executive Leadership Team member and the Company Secretary.

Responding to Concerns

Origin will assess all Bribery or Corruption concerns raised and will appoint an appropriate person to determine how to respond. Where appropriate, a formal investigation will be conducted.

Third Parties including agents, representatives and Associates

When engaging third parties, Origin Personnel must check Origin's Anti-Bribery and Corruption Due Diligence Standard to determine whether due diligence is required (**ABC DD Standard**).

You must implement appropriate controls using the ABC DD Standard to ensure that each third party meets the requirements of this Policy where required.

As a minimum you must:

- ensure that Origin's standard ABC Clause is incorporated into each contract with a third party;
- oversee and monitor their work activities on an ongoing basis for Bribery and Corruption risks and escalate any concerns in line with this Policy.

Due diligence must also always be conducted in connection with potential joint venture arrangements, mergers or acquisitions in accordance with the ABC DD Standard.

Dealing with Public Officials and Political Donations

Origin Personnel must not:

- make or offer gifts to any Public Official; or
- make a donation to a political party on behalf of Origin.

Origin Personnel must obtain the following approvals prior to undertaking other activities with Public Officials. A record of any approvals received must be kept.

Approver	Activities
Executive Leadership Team Member	• pay for travel and accommodation of a Public Official even where there is a legitimate business reason for doing so • offer entertainment or hospitality to a Public Official
Executive General Manager, Corporate Affairs	Appointment of an agent to engage with Public Officials on behalf of Origin
General Manager, Government Engagement	Attendance at an event or function organised by a political party

Gifts and Hospitality

Origin prohibits the giving or receiving of Gifts or hospitality in connection with Origin operations which go beyond the common courtesies of general commercial practice.

In all circumstances, Origin prohibits:

- Gifts or hospitality if offered in the form of physical cash or equivalents; or
- any efforts made by others (including suppliers, customers or clients) to unfairly or inappropriately influence any decision-making process in order to achieve an unfair advantage or benefit.

If you give or receive a Gift over A$200 or hospitality over A$200 per person per event (or a lower limit in a country outside Australia if there is one) you must:

- get approval from your Executive Leadership Team member; and
- record this in Origin's online Gifts and Hospitality Register.

Travel and Accommodation

You must not accept travel or accommodation from anyone other than Origin.

If you want to pay for travel or accommodation for someone who does not work at Origin there must be an appropriate business reason for it, and you must get prior approval from your Executive Leadership Team member.

Charitable Donations and Sponsorships

If you want to make a donation or sponsor a charity on behalf of Origin you must first get approval under Origin's Delegated Authorities Policy.

Record Keeping

You must keep accurate and auditable records of all expenses you incur, including all Gifts, entertainment and payments.

You must not record anything that may distort or disguise the true nature of a transaction.

3. Roles and Responsibilities

The roles and responsibilities in relation to this Policy are set out in the table below:

POSITION	RESPONSIBILITIES
Board (Policy Approver)	• Approving any material change to this Policy. • Receiving reports of any material breach of this Policy.
General Manager, Corporate, Disputes and Regulatory Legal & Group ES&O and LPG Compliance (Policy Owner)	• Giving guidance to people about this Policy. • Monitoring implementation and the effectiveness of this Policy. • Receiving reports of any breach of this Policy, overseeing any investigation and management of consequences, and reporting any material breach to the Board. • Reviewing this Policy as needed, and at least every three years, making sure it remains adequate and effective. • Giving assurance to the Board about the adequacy and effectiveness of this Policy. • Making sure people know about the requirements of this Policy. • Making sure this Policy is available on Origin's public website.

4. Compliance

Any breach of this Policy is serious misconduct and may result in dismissal. Breach of relevant laws may also expose you to civil or criminal legal liability.

The Board or Audit and Risk Committee will be made aware of investigations and material breaches of this Policy.

5. Contacts & More Information

Document Owner	General Manager, Corporate, Disputes and Regulatory Legal & Group ES&O and LPG Compliance
Key Contact	General Manager, Corporate, Disputes and Regulatory Legal & Group ES&O and LPG Compliance
Effective from	February 2025
Next Review due	February 2028

Attachment 1 – Definitions

TERM	DEFINITION
ABC Clause	The relevant Business Practices clause in Origin Legal's templates available on Source.
Bribery	Offering, promising, giving, accepting or soliciting an advantage as an inducement for action which is illegal, unethical or in breach of trust. A bribe can be made directly or indirectly (for example through a third person).
Corruption or Corrupt	Any dishonest activity where a person acts against the interests of Origin and abuses their position of trust to get an advantage for themself or someone else.
Facilitation Payment	A payment or other inducement given to a Public Official to secure or expedite a Routine Government Action that Origin is entitled to under law and in the ordinary course of business. These are generally relatively minor payments made to lower-level officials or employees. It is irrelevant whether the payment is intended to distort or influence a proper decision-making process.
Gifts	Includes payments, payments in kind such as goods or services, favours, travel and accommodation, and other benefits.
Public Official	• an official or employee of a government or government owned enterprise, agency, statutory authority or regulatory authority; • an official or employee of a political party or a political candidate; • any official or employee of an international public organisation such as the United Nations, World Bank or International Monetary Fund; • a member of the judiciary; • a person who holds or does the duties of an appointment, office or position created by custom or convention, including some members of royal families and some tribal leaders; • a person who is, or holds themselves out to be, an authorised intermediary of a public official; • police officers, customs and tax officials, employees of state-owned enterprises, and political party officials; or • a relative or associate of a public official (as described in the other parts of this definition).
Routine Government Action	An action that is ordinarily performed by a Public Official and may include but not limited to the following: • granting a permit, licence or other document that qualifies a person to do business in the country; • processing government papers such as visas or work permits; • providing police protection or mail collection or delivery; • scheduling inspections associated with contract performance or transit of goods; • providing telecommunication services, power or water; • loading and unloading cargo; or • protecting perishable products or commodities from deterioration.
Secret Commission	Benefits that are given, offered, received or solicited by an agent or representative of another person or entity, where that benefit is: • not disclosed to the principal; and • given, offered, received or solicited as an inducement or reward for providing or having provided a favour, or the receipt of which would tend to influence the provision of a favour.