Anti-Bribery, Fraud & Corruption Policy

BlackWall Group

BLACKWALL

Anti-Bribery, Fraud & Corruption Policy

1 Policy Overview

BlackWall Limited (ASX:BWF) (**BlackWall**) does not tolerate or accept any form of bribery, fraud and corruption. Fraudulent or corrupt activity of any kind, including for the benefit of BlackWall, is expressly forbidden.

2 Fraud

Fraud is dishonest, wrongful or criminal activity with the intent of obtaining a financial or personal gain that adversely affects another person or entity including but not limited to, theft of monies or other property where deception is used.

This includes the deliberate falsification, concealment, destruction or use of falsified documents used or intended for use for a normal business purpose or the improper use of information or position for personal financial benefit.

Fraud can be committed by an employee or a person external to BlackWall.

Examples of fraud may include but are not limited to:

- diversion of cash e.g. accounts receivable or accounts payable;
- falsifying invoices or employee expense reimbursements;
- unauthorised use of a Corporate Card;
- dishonest or intentional misleading financial performance reporting;
- theft of assets e.g. physical assets, cash, equipment, supplies;
- theft of Data, Information, Intellectual Property or personal and corporate identities.

3 Corruption

Corruption is activity in which BlackWall officers and employees or persons external to BlackWall act contrary to the interests of BlackWall and abuse their position of trust to achieve direct or indirect personal gain or advantage for themselves or another person or entity.

Bribery is a form of corruption. Bribery is the act of offering, promising, paying or accepting, directly or indirectly a benefit with the intent of influencing another individual who is expected to act in good faith or in an impartial manner, to perform that function dishonestly or to obtain and retain an advantage in the course of business. Bribery can take many forms including:

- giving cash or excessive gifts, including accommodation or travel;
- giving or making political donations either directly or indirectly;
- paying secret commissions;

- making inflated tenders or false invoices;
- blackmail or leverage of personal information to obtain an advantage.

4 Prevention and Detection

You must act honestly and with integrity and report any instance of suspected or evident fraud or corruption immediately to your Manager, Company Secretary, or the COO. All instances of actual, suspected or alleged fraud will be investigated and dealt with seriously. Any breach of this policy will be subject to disciplinary action, up to and including immediate termination of employment or engagement.

BlackWall strictly prohibits the offer or acceptance of improper financial or other inducements, such as bribes and kickbacks, cash, gifts, or entertainment that are intended to influence or reward favourable commercial, regulatory and governmental decisions. You must not give, offer, promise, accept, request or authorise a bribe whether directly or indirectly, on behalf of, or for the benefit of, BlackWall.

5 Governance Process

BlackWall periodically assesses its exposure to bribery, fraud and corruption risk and the controls used to manage these risks through several processes including:

- operating risk reviews;
- internal and external audit planning and reporting;
- credit card expenditure monitoring;
- due diligence via onboarding and ongoing screening of employees and third parties; and
- annual review of this policy.

6 Reporting

BlackWall expects its employees and officers to assist in the identification of bribery, fraud and corruption risks. Employees should be alert to behaviour which may indicate fraud or corruption.

BlackWall employees must immediately report suspected or actual instances of bribery, fraud, corruption or other improper conduct to their Manager, the Company Secretary or the Chairman of the Board.

BlackWall is committed to a culture in which employees can raise and report incidents of suspected fraud and corruption. Where an employee is not comfortable reporting through their Manager, the Company Secretary or Chairman, they are encouraged to report the matter anonymously in accordance with the Whistleblower Policy by contacting Don Bayly, BlackWall's independent whistleblower contact, on +61 402-027-192 or ddbaylyf@bigpond.net.au

7 Recovery of the proceeds of fraudulent conduct

Wherever possible, BlackWall reserves the right to pursue any party who has committed fraudulent activity or a corrupt act. To the full extent permitted by law BlackWall will attempt to recover any assets lost and seek criminal or civil restitution.

Participation in or the facilitation of or the non-reporting of fraudulent or corrupt conduct is a breach of BlackWall's Code of Conduct and will result in disciplinary action up to and including termination of employment.

8 Policy Review and Ownership

This policy will be reviewed by the Company Secretary as required.