

## ANTI-BRIBERY AND CORRUPTION POLICY

### 1. INTRODUCTION

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Immutep Limited (the “Company”) is committed to maintain high standards of integrity and to operate in compliance with applicable laws, regulations and policies. Therefore, it is critical that employees and other persons working with the Company should be committed to complying with all laws that apply to it, including anti-bribery and corruption laws.

This Policy reflects Immutep’s Statement of Values and provides more detail on certain matters covered in our Code of Conduct.

This policy applies to all the Company employees (whether permanent, part time, fixed term or temporary), contractors, consultants, seconders and directors with whom it does business. Under the Policy you must:

- not give or accept gifts and/or benefits that will compromise, or appear to compromise, your integrity and objectivity in performing your duties;
- not give or accept gifts and/or benefits that cause, or appear to cause a conflict of interest

### 2. ANTI- BRIBERY POLICY STATEMENT

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Immutep Limited or the Company, has a zero tolerance policy towards bribery and corruption.

Bribery is the offering, promising, giving, accepting or demanding of an advantage as an inducement for an action which is illegal, unethical or a breach of trust. A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage and can take the form of gifts, loans, fees, rewards or other advantages.

Corruption is a form of dishonesty or criminal offense undertaken by a person or organization entrusted with a position of authority, to acquire an illegal benefit or to abuse power for one's private gain.

Immutep Limited prohibits the offering, giving, accepting or demanding of any bribe or corrupt inducement, whether in cash or in any other form:

- by any of Immutep Limited's employees for whatever reason;
- to or from any person or company wherever located, whether a public official or public body, or a private person or company;
- to or from a member of any legislative, administrative or judicial body;
- to or from an official, employee or contractor of any public international organisation (such as the United Nations, the World Bank or the International Monetary Fund);
- to or from any commercial entity, or the directors, officers or employees of a commercial entity, in which a government body has a significant ownership interest or over which it otherwise exerts control (i.e. a foreign public enterprise);

### **3. GIFTS, HOSPITALITY AND ENTERTAINMENT**

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Gifts, hospitality, and corporate entertainment must be modest, reasonable and infrequent so far as any individual recipient is concerned. For example, lunch or dinner with a customer after a meeting is fine.

Gifts, hospitality, and entertainment must never be promised, offered, or provided with the intent of causing the recipient to do something favouring the company.

All expense claims relating to hospitality, gifts or expenses incurred to third parties must be submitted in accordance with our Expenses Policy and the specific reason for the expenditure should be recorded.

#### **3.1. Gifts, Hospitality and Entertainment Acceptance Process**

The offer or acceptance of gifts hospitality and entertainment is permitted where it:

- involves, or is reasonably likely to involve, a third party paying for travel or accommodation, and that payment is approved by the CEO;
- is for a legitimate business purpose, which may include developing business relationships;
- is given in an open and transparent manner;

- does not include cash, loans or cash equivalents (such as gift certificates or vouchers);
- complies with the local law and government policies of the country in which the expenditure is made;

#### **4. FACILITATION PAYMENTS AND SECRET COMMISSION**

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Facilitation payments are minor unofficial payments made to public officials to expedite or secure the performance of routine government action (for example issuing permits or licences). Facilitation payments are a form of bribery and are prohibited under this Policy.

Secret commissions typically occur where a person or entity (such as an employee of the company) offers or gives a commission to an agent or representative of another person which is not disclosed by that agent or representative to their principal. Such a payment is made as an inducement to influence the recipient to recommend that their principal or client enters into a transaction with or provides a benefit to the Company, or to engage in such conduct on behalf of their principal.

#### **5. DONATIONS**

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##### **5.1. Political Donations**

Immutep employees must not, on behalf of the Company, make a political donation to any political party, politician or candidate for public office in any country unless the donation has been approved in advance by the Board and complies with the local law and government policies of the jurisdiction where the donation is made.

##### **5.2. Charitable Donations**

Immutep employees must not, on behalf of the Company, make a charitable donation to any charity using Company resources unless the donation has been approved in advance by the Board or, where the amount of the donation is no greater than A\$10,000, by the CEO, and complies with the local law and government policies of the jurisdiction where the donation is made.

#### **6. RESPONSIBILITY**

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All employees, contractors, consultants, secondees and directors of Immutep Limited must:

- ensure that they read, understand and comply with this Policy;

- avoid any activity that might lead to, or suggest a breach of this Policy;
- notify any gift, hospitality and entertainment received or being offered, to them and record any financial transactions within Immutep's accounting systems, consistent with all applicable expense policies and procedures and maintain all required documentation support; and

## **7. TRAINING**

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Immutep will provide training to those of its employees likely to be exposed to Bribery or Corruption about how to recognise and deal with it.

## **8. HOW TO RAISE A CONCERN**

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All Immutep employees have the responsibility to help detect, prevent and report instances of bribery and corruption as well as any other suspicious activity or wrongdoing in connection with Immutep business. If you become aware of an issue or behaviour which you consider to be a Reportable Event, you may report it (confidentially, and anonymously if you wish) via post, email or telephone to:

- i. the CEO (Marc Voigt) or
- ii. the COO, General Counsel & Company Secretary (Deanne Miller)

each of whose contact details can be located on the Company intranet

Each of the CEO and the Company Secretary is:

- i. designated to receive reports under the framework of our Whistleblower Policy; and
- ii. responsible for promptly advising the Board or Audit and Risk Committee of any material breaches of this Policy which are reported to them.

Our Whistleblower Policy also describes how reports may be made on a confidential and (as an option) anonymous basis, and sets out the protections for Eligible Whistleblowers against reprisal, harassment or other adverse consequences.

## **9. REVIEW OF THIS POLICY**

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The Audit & Risk Committee is committed to continuously reviewing and updating the Company's policies and procedures to ensure that they are operating effectively, and may from time to time report to the Board any changes it considers should be made to this Policy.

This Policy may be amended by the Board at any time and the amended version will take effect upon publication on the Company's website and intranet.

## **10. APPROVED AND ADOPTED**

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This Policy was approved and adopted by the Board on 1 June 2020.