

Civmec is an integrated, multidisciplinary construction and engineering services provider to the Energy, Resources, Infrastructure, Marine and Defence sectors.

Civmec is committed to conducting its business and activities with integrity. Civmec prohibits bribery and corruption in any form, whether direct or indirect, whether in the private or public sector.

To achieve this objective, Civmec:

- Will not engage in corrupt business practices.
- Has implemented measures to prevent bribery and corruption by any officer, employee and Third Parties (including contractors) representing Civmec.
- Will, at a minimum, comply will all legislation that relates to bribery and corruption as well as any relevant industry standards.

Compliance with this Policy is mandatory. Penalties may be imposed by legislation on Civmec, its officers and employees, and Third Parties (including contractors) representing Civmec for non-compliance with anti-bribery and corruption measures. Further, any breach of this Policy or legislation may result in the termination of your employment or contract with Civmec.

This policy is supported by the Anti-Bribery and Corruption Procedure and Civmec Code of Conduct which must also be complied with.

Examples of conduct that may amount to bribery and/or corruption and therefore be a breach of this Policy include:

- Not paying for goods or services provided to Civmec.
- Paying a price for goods or services provided to Civmec that is greater than the fair market value of the goods or services received which benefits any Civmec employee.
- Making facilitation payments.
- Giving or receiving gifts and entertainment that go beyond common courtesies associated with general commercial practice.
- Acting on hiring, contracting or subcontracting recommendations from Government Officials or Foreign Public Officials without complying with Civmec's standard hiring, contracting or subcontracting criteria.
- Not disclosing a conflict of interest.
- Making any unauthorised cash transactions.

These examples are not exhaustive. All of Civmec's officers and employees and Third Parties (including contractors) must be vigilant and ensure they do not engage in conduct that amounts to bribery and/or corruption.

All of Civmec's officers and employees and Third Parties (including contractors) must report any conduct that may be bribery and/or corruption. The process for reporting such conduct is set out in the Whistleblowing Procedure. Employees will not face any adverse consequences when refusing to engage in bribery or corruption and in reporting any suspected instances of bribery or corruption.

For further information please contact your Line Manager, Chief Financial Officer or Group HR Manager.

Patrick Tallon Chief Executive Officer Civmec Group February 2023