

Group Anti-Bribery and Corruption Policy

Buildcorp maintains a high standard of integrity and professionalism to sustain our reputation and earn our clients' trust.

Objectives

This policy provides the basis for:

- ▶ Preventing collusive tendering practices
- ▶ Preventing employees from offering gifts or benefits to influence a tendering process
- ▶ Preventing employees from accepting gifts or benefits that could compromise their integrity and objectivity in performing their duties

Commitments

To achieve these goals, our policy is to:

- ▶ Have zero tolerance for employees giving, offering, promising, accepting, requesting or authorising a bribe as part of a tendering process, or in any other business activity
- ▶ Conduct periodic reviews to provide assurance that internal controls are effective in countering bribery and corruption, especially in tendering processes
- ▶ Keep financial records and have appropriate internal controls in place to evidence the business reason for making any payments to third parties
- ▶ Prevent accounts from being kept 'off book'
- ▶ Require employees to declare all gifts and benefits, valued at \$500 or more
- ▶ Perform regular reviews of the register to identify and manage any emerging risks

Responsibility and Accountability

- ▶ The Human Resources Department is responsible for internal controls and for maintaining and reviewing the Gift and Entertainment Register.
- ▶ Buildcorp managers are responsible for ensuring employees understand their responsibilities under this policy.
- ▶ Buildcorp employees are responsible for declaring any gift or benefit, valued at \$500 or more, in the Gift and Entertainment Register within three business days of receiving it.

This policy will be reviewed at least annually and updated as required to take legislative changes into account.



Tony Sukkar AM
Group Managing Director
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