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### **Anti-Corruption/Bribery/Graft**

The Company is committed to honesty, transparency and fairness and has zero tolerance for Bribery, including making Facilitation Payments or Graft. The Company rejects Corruption in all of its forms and complies with the spirit and letter of all applicable anticorruption laws and regulations.

#### **Company Representatives are required to:**

- Reject Corruption in all of its forms, including Bribery, making Facilitation Payments, Graft or any Prohibited Act;
- Understand and appreciate that Bribery and Graft are unlawful and therefore strictly prohibited, regardless of jurisdiction or circumstance;
- Adopt and enforce all policies that prevent Corruption in the conduct of business;
- Ensure that no Public Official benefits financially or in any other unlawful way from the relationship with the Company (or any Client);
- Operate with an adequate system of internal accounting controls and maintain accurate records that document relevant transactions; and
- Immediately inform their line manager and the Project Director or, where a Project is not involved, a Business Partner, if information is discovered indicating that a Prohibited Act has been committed, has been requested or otherwise suggested by any person, including a Public Official or private individual, in connection with, in relationship with, or working for the Company.

#### **Company Representatives must not:**

- Directly or indirectly, commit or attempt to commit, any Prohibited Act, including Bribery, Graft or making a Facilitation Payment;
- Directly or indirectly receive a Bribe;
- Use their authority for personal gain; or
- Offer, provide or receive unlawful gifts, benefits, hospitality, advantages, courtesies or entertainment from a Public Official where a reasonable person could interpret the offer, provision or receipt as a Prohibited Act made in connection with the Representative's duties, status or authority.

Hospitality is permitted under specific circumstances. Bona fide hospitality or other business expenditure with the aim of presenting the Company or its products or services, or establishing cordial relations is permitted. However, hospitality or promotional expenditure can be misinterpreted as Bribery and Representatives must keep in mind appearances and perceptions and not offer hospitality where it could be mistaken to have the intention of influencing an official to

secure a business advantage, to perform a function improperly or to expedite the performance of a routine government action.

Receipt and provision of gifts, benefits or entertainment must be notified on relevant registers kept for that purpose in accordance with a relevant Business Process.