

# Anti-Bribery and Corruption Policy

## Purpose

### Overview

Thiess prohibits, and has zero tolerance for, all forms of bribery and corruption and is committed to the prevention, detection and initiatives to eliminate bribery and corruption in accordance with the [Group Code of Conduct \(the Code\)](#).

This Policy should be read in conjunction with the Code and the [Group Code of Conduct – Management, Monitoring and Reporting Procedure](#), and applies to Thiess Group Holdings and its subsidiaries.

## Policy

### 1. Bribery

Bribery involves the offer, grant, promise or acceptance of any payment, gift, benefit or favour, whether directly or through a third party such as a subcontractor or consultant. A bribe can be to or from a government official or private individual.

Gifts and hospitality may, in certain circumstances, constitute or give the appearance of bribery. All intended gifts and hospitality need to be carefully considered in accordance with the Code and the Operating Company's Gifts and Hospitality Procedures.

### 2. Facilitation Payments

Facilitation payments are payments of cash or in kind made to secure or expedite a routine service, or to 'facilitate' a routine Government action. They are often distinguished from a bribe and have been common practice in some countries. The Code prohibits facilitation payments.

### 3. Corruption

Corruption involves the abuse of a position of employment, authority or trust to gain an advantage. Examples include:

- giving or taking secret commissions or bribes, (including bribery of foreign officials), which may be paid in money or in some other benefit in the course of business or otherwise (even where it may not result in the winning of a business opportunity), in order to influence the receiver to procure an advantage;
- providing, promising or creating an expectation of benefit or reward, or the expectation of such a benefit or reward;
- making a 'facilitation payment' directly or indirectly, to any Government officials;
- procuring or accepting payments, gifts or entertainment from suppliers and subcontractors as reward or encouragement for preferential treatment;
- payment of benefits to foreign public officials to:
  - obtain or retain business, and / or
  - obtain or retain a business advantage that is not legitimately due to the recipient;
- release of confidential information for a purpose other than a proper business purpose in exchange for some form of benefit or advantage accruing to the employee releasing the information; and
- engaging or permitting a third party to do any of the above.

### 4. Minimum Requirements

Prevention of bribery and corruption relies on the following factors:

- promotion of and adherence to an ethical culture of integrity and accountability;

- management accountability;
- effective employee recruitment procedures;
- on-going training and awareness and enforcement;
- carrying out periodic risk assessments; and
- strong internal control systems.

#### 4.1. Management accountability

All Managers are individually accountable for managing bribery and corruption risk.

As a further preventative measure, losses from bribery and corruption issues are to be directly allocated to specific profit and cost centres.

#### 4.2. Maintaining internal control systems

Thiess is responsible for implementing, maintaining and continuously improving an internal control system for the prevention and detection of bribery and corruption. This will be approved and monitored by the General Counsel and Company Secretary.

#### 4.3. Reporting process

All requests for facilitation payments or attempts of bribery and corruption must be reported to the Business Conduct Representative as soon as practicable after the request is received.

### Policy Information

<b>Owner:</b>	General Counsel and Company Secretary, Thiess
<b>Approved By :</b>	Chief Executive Officer, Thiess
<b>Effective Date:</b>	1 December 2021

Note: Thiess policies may be amended from time to time.