



# Anti-Bribery & Corruption Policy

At Decmil (inclusive of all subsidiary companies of Decmil Group Limited, collectively referred to in this Policy as Decmil) we are committed to conducting business and activities with integrity. Decmil prohibits Bribery and Corruption in any form, direct or indirect, whether in the private or public sector.

To achieve this objective, Decmil:

- Will not engage in corrupt business practices.
- Has implemented measures to prevent Bribery and Corruption by any officer, employee or third party (including contractor) representing Decmil.
- Will, at a minimum, comply with all legislation that regulates Bribery and Corruption activities, as well as any relevant industry standards.

Penalties may be imposed by legislation on Decmil, its officers and personnel for non-compliance with anti-bribery and corruption measures.

Examples of conduct that may amount to bribery and/or corruption include:

- Not paying for goods or services provided to Decmil or paying a price for the goods or services provided to Decmil that is greater than the fair market value of the goods or services received.
- 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 Decmil's standard hiring, contracting or subcontracting criteria.
- Not disclosing a conflict of interest.
- Making political or other donations.
- Making any unauthorised cash transactions.

These examples are not exhaustive. All of Decmil's personnel must be vigilant and ensure they do not engage in conduct that amounts to Bribery and/or Corruption.

This Policy is supported by the [Anti-Bribery and Corruption Work Procedure](#) and [Code of Conduct](#), which must also be complied with. All personnel must report any conduct that may be seen to be Bribery and/or Corruption. The process for reporting such conduct is set out in the Anti-Bribery and Corruption Work Procedure and the [Whistleblowing Work Procedure](#).

**This Policy was approved by the Decmil Group Limited Board on 26 July 2022.**

**Andrew Barclay**  
Chairman