

ANTI-CORRUPTION & BRIBERY POLICY

Reay Services Group is a pipeline construction, mining services, civil and trenching company that consistently delivers quality services to customers.

It is our policy to conduct all of our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our relationships and business dealings wherever we operate and to implementing and enforcing effective systems to counter bribery, in line with the Australian Criminal Code, other relevant legislations and acts.

This policy applies to all individuals working at all levels, including senior managers, officers, directors, employees (whether permanent, fixed-term or temporary), consultants, contractors, trainees, and agency staff, volunteers, agents, sponsors, or any other person associated with us, or any of our subsidiaries or their employees, wherever located (collectively referred to as **workers** in this policy).

We have identified that certain aspects of our activities create particular risks for our organisation, in particular:

- a. Overseas collaborations, joint ventures and partnerships (whether formal or informal);
- b. Receipt of gifts and donations
- c. Public procurement, particularly where the activities relate to construction.

It is not acceptable for you (or someone on your behalf) to:

- a. give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given;
- b. give, promise to give, or offer, a payment, gift or hospitality to a government official, agent or representative to "facilitate" or expedite a routine procedure;
- c. accept payment from a third party that you know or suspect is offered with the expectation that it will obtain a business advantage for them;
- d. accept a gift or hospitality from a third party if you know or suspect that it is offered or provided with an expectation that a business advantage will be provided by us in return;
- e. threaten or retaliate against another worker who has refused to commit a bribery offence or who has raised concerns under this policy; or
- f. engage in any activity that might lead to a breach of this policy.

This policy shall be reviewed on an as required basis and in accordance with QMS-REG-018 – HSEQ Audit Schedule.

Brett Reay
Managing Director

