

Anti-Bribery and Corruption Policy

Approved by BG&E Resources' Audit & Risk Management Committee (ARC)

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1. Purpose

BG&E Resources Pty Ltd (“BGER”) (“the Company”), ABN 94 628 465 056, is an employee-owned, multidisciplinary engineering and ESG advisory consultancy, delivering technical solutions for clients in the Resources, Energy and Industrial sectors. We are united by our purpose – together, we embrace ambition and innovation to solve complex problems, engage communities and transition all to a nature-positive future – and committed to helping clients to decarbonise.

The Company is committed upholding the highest ethical business standards in all business activities.

The purpose of this Anti-Bribery and Corruption Policy (“Policy”) is to establish a culture where we conduct business in an honest and ethical way at all times.

BGER chooses to do the right thing in everything we do and will fully support and protect our people and business partners who are acting and conducting themselves in accordance with the principles presented in our Code of Conduct.

The governance of our Anti-Bribery and Corruption Policy is overseen by the Company’s ARC.

2. Scope

This Policy applies to all employees of BGER. When we say “we”, “our” or “us” we are referring to everyone at the company.

Where appropriate, we will also encourage our clients, joint venture partners, stakeholders and suppliers, including non-BGER staff working for, or representing, BGER on client’ sites, and community stakeholders, to respect this Policy.

Any complaints or reports of violation of this Policy will be treated quickly and seriously. They will be investigated thoroughly, impartially, and where possible, confidentially.

3. Definitions

3.1 Bribery

Bribery is best described as an attempt to make someone do something for you by giving the person money, presents, facilitation payments, or something else that they want.

Examples of bribery include but are not limited to:

- paying a government official to get advanced warning of a development;
- employing a public official's relative to influence the award of a contract; and/or
- paying the travel expenses of a client to gain engagement on a project.

3.2 Corruption

Corruption is illegal, bad, or dishonest behaviour, especially by people in a position of power. It occurs when someone who has been granted official power exploits them for his or her benefit.

4. Responsibilities

BGER holds our core values at the forefront of all activities we undertake. We value integrity and hold ourselves and others accountable for all actions.

We are committed to ethical behaviours regarding both the internal conduct of our business and our engagement with clients, partners, external stakeholders, and the public.

BGER:

- Does not condone, enable or permit any form of bribery, corruption or unethical behaviours or practice.
- Takes a zero tolerance approach to corruption of any kind, including bribery, kickbacks and facilitation payments.
- Competes fairly for our commissions based on quality price and innovative services, not by offering improper benefit to others.

Employees cannot:

- Directly or indirectly offer, promise, grant or authorise the giving of money or anything else of value to client and government officials or third parties to influence official action or obtain improper advantage. This includes facilitation payments.
- Authorise, undertake or participate in schemes to give any improper benefit, kick back or secret commission to anyone.
- Promise or give cash or cash equivalent payment of any person or official for the purpose of obtaining advantage.
- Use any third party to do something that is prohibited by BGER.
- Give anything of value to any third party when there is any suspicion that the third party will engage in bribery, corruption or other prohibited conduct.

We foster an open environment in which our people can report any suspected, fraudulent, or other improper practice without fear of reprisal. All reported incidents will be treated in confidence and investigated promptly independently with appropriate follow-up.

We will co-operate fully with external agencies investigating corrupt practices within any legal parameter.

5. Legislation and Standards

BGER will comply with all Australian requirements and legislations, as well as with internationally recognised standards for bribery and corruption including but not limited to:

- The Australian Criminal Code Act 1995 (Cth) – which criminalises corrupt conduct both domestically and internationally.
- The United Nations Convention Against Corruption (UNCAC) – the only binding international treaty dealing with corruption.

There are considerable penalties for corporations and individuals found to have engaged in bribery or corruption either domestically and/or internationally. These include financial penalties and imprisonment.

6. Resolution of Issues

Information on potential non-compliance with this Policy by BGER, its employees, clients, suppliers and any third parties with whom BGER conducts or anticipates conducting business with, must be reported promptly.

Employees can report issues of bribery or corruption by:

- contacting or speaking to their Manager;
- contacting or speaking to any of the Directors or Members of the Executive Leadership Team;
- contacting or speaking to the Director, Environmental, Social & Governance and Development; and
- contacting or speaking to any of Members of the ARC.

We also encourage our clients and stakeholders to report and express their concerns relating to our employee' behaviours and suspected violations of this Policy.

For further details about the Company's Anti-Bribery and Corruption Policy, please contact:

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