

GANDEN Engineers and Project Managers (GANDEN) is committed to ensuring we do not participate in any corrupt activity. This Anti-Corruption and Bribery Policy provides guidance about managing corruption risk.

GANDEN Employees must not authorise, offer, give or promise anything of value, directly or indirectly (for example, through a third party), to anyone to influence them in their role, or to encourage them to perform their work disloyally or improperly.

No one in GANDEN should ever make facilitation payments which are payments to government officials for routine services that are legally available.

You must get pre-approval before:

- Offering anything of value to an external person;
- Engaging a supplier who will interact with others on our behalf;
- Offering to undertake a community donation or project;
- Offering to sponsor an event.

When you offer or provide anything of value to an external person, the item must:

- Only be offered or provided for a legitimate business purpose;
- Not be offered or provided to improperly influence or reward action;
- Be legal under local laws;
- Be of appropriate value and nature considering local customs and law, the position of the recipient and the circumstances;
- Not be capable of causing reputational damage to GANDEN.

If you become aware of any corrupt or inappropriate behaviour of any GANDEN employee, contractor or agent then you must report this to your line manager immediately.

This policy is available to all interested parties.



Darron Nutt
Managing Director
GANDEN Pty Ltd
19 March 2018

| Doc ID | Revision | Prepared by | Approved by | Date |
|--------|----------|-------------|-------------|------------|
| POLO5 | 3.0 | Darron Nutt | Darron Nutt | 19/03/2018 |