



Anti-Bribery and Anti-Corruption Policy – Engineering Building & Infrastructure Pty Ltd

Purpose and Scope

Engineering Building & Infrastructure (EBNI) Pty Ltd is a multidisciplinary engineering and construction firm delivering projects in education, commercial, residential and infrastructure sectors. Our reputation is built on integrity and our core values of safety, service and sustainability. We are committed to conducting all business ethically and honestly, and this Anti-Bribery and Anti-Corruption Policy formalizes that commitment. It applies to all Directors, officers, employees, contractors and agents of EBNI worldwide. The purpose of this policy is to provide guidance on recognizing and preventing bribery and corruption, and to clarify everyone's responsibilities in upholding these standards. The policy aligns with Australia's legal framework and international best practices, including the [Criminal Code Act 1995 \(Cth\)](#), ISO 37001 (Anti-Bribery Management Systems) and other relevant laws and standards.

Policy Statement (Zero Tolerance)

EBNI adopts a **zero-tolerance** approach to bribery and corruption in any form. *Bribery* means offering, promising, giving, demanding or accepting any advantage (such as money, gifts or other benefits) to induce or influence an improper action or breach of duty. Under Australian law, bribery is strictly prohibited by the Criminal Code Act 1995. For example, the law makes it an offence to dishonestly “provide a benefit to another person...with the intention of influencing a public official” in the exercise of their duties. Similarly, Division 70 of the Act makes it an offence to give or offer any benefit to a *foreign* public official to improperly influence them in order to obtain or retain business. The term “*benefit*” is defined broadly as “any advantage”, meaning bribery can take many forms (cash, gifts, hospitality, favors, etc.), not just money. EBNI therefore prohibits the giving or receiving of any bribe or kickback, whether directly or through intermediaries, to private individuals or government officials. No employee or third party may engage in facilitation payments or any other corrupt practices.

Legal and Regulatory Compliance

All EBNI personnel must comply with this policy and all applicable anti-bribery laws. In Australia, as noted, the Criminal Code Act 1995 (Cth) sets out offences for both domestic and foreign bribery. We also respect other applicable laws (for example, state laws or specific sector regulations), and where we operate internationally we take account of relevant foreign anti-corruption laws (such as the UK Bribery Act 2010 or the US Foreign Corrupt Practices Act). In addition, EBNI honors international anti-corruption conventions to which Australia is a party – for instance, the OECD Convention on Combating Bribery of Foreign Public Officials and the United Nations Convention against Corruption. This policy is consistent with these instruments and with recognized best-practice guidelines (for example, the Transparency International Business Principles for Countering Bribery). In short, our business operations will always be legitimate, transparent and compliant with both the letter and spirit of anti-bribery legislation and standards.

Alignment with ISO 37001 and Best Practices

EBNI's anti-bribery measures are aligned with ISO 37001:2025, the international standard for anti-bribery management systems. ISO 37001 provides requirements and guidance on establishing, implementing, maintaining and improving controls to prevent, detect and respond to bribery. In line with ISO 37001, our program includes documented anti-bribery policies and procedures, due diligence on third parties (such as contractors, agents and suppliers), and risk-based controls. Key components of an effective anti-bribery system – as highlighted by ISO 37001 – include formal policies, due diligence procedures, strong financial and non-financial controls, employee training, and mechanisms for monitoring, reporting and continuous improvement. We conduct regular risk assessments of our activities and business partners, maintain accurate and transparent financial records, and ensure that decision-making and approvals cannot be unduly influenced. By following these practices, EB&I strengthens its governance and creates a culture of integrity throughout the organization.

Responsibilities and Training

All EBNI personnel and those acting on our behalf must read, understand and comply with this policy. The Company requires everyone covered by this policy to conduct business activities in compliance with it and with all relevant anti-bribery laws. Employees are responsible for avoiding any actions that could be perceived as bribery or corruption. This includes refusing requests for improper payments or gifts, and never offering anything of value to improperly influence customers, suppliers or officials. Management at all levels must lead by example, ensure the policy is communicated to staff, and foster an environment where ethical conduct is rewarded. We will provide regular training and communications so that employees know how to recognize suspicious situations and understand their obligation to reject bribery. EBNI will also extend these standards to intermediaries and partners: before entering into relationships, we screen agents, joint-venture partners and contractors to ensure they share our commitment to anti-corruption practices.

Reporting, Monitoring and Enforcement

Anyone who becomes aware of a potential violation of this policy – such as an offer of a bribe, questionable gift, or a request for undue payment – must report it promptly through the Company's reporting channels (e.g. to a manager, compliance officer or via our whistleblower system). Reports will be treated seriously and investigated confidentially. EBNI does not tolerate retaliation against anyone who in good faith reports a concern. The Company will monitor compliance through audits and reviews of our operations and third-party relationships. Any breach of this policy or the law may lead to disciplinary action, including termination of employment or contracts, and could also result in legal penalties for the individuals and the Company.

Communication and Review

This policy will be communicated to all employees, directors and relevant third parties, and will be made available to stakeholders. EB&I will periodically review and update the policy to reflect changes in laws or business circumstances. By implementing and enforcing this Anti-Bribery and Anti-Corruption Policy, Engineering Building & Infrastructure Pty Ltd demonstrates its commitment to legal compliance, ethical conduct and good corporate governance in all our business activities.

This policy will be reviewed at least annually or whenever there is a significant change in our operations or legal requirements. Any updates will be approved by the Board. The next review date 11/07/2026.