



RCR Tomlinson Limited ("**RCR**") is committed to conducting its business and all associated activities with integrity.

Our commitment:

- Not to engage in corrupt business practices;
- To comply with all applicable anti-bribery and corruption laws;
- To maintain and implement appropriate measures to prevent bribery and corruption by RCR and its directors, officers, employees, contractors, and any other party representing RCR.

Your commitment:

- To be guided by RCR's vision and values of openness, transparency and honesty;
- To comply with RCR's Anti-Bribery and Corruption Policy and Code of Conduct, which includes rules on gifts, hospitality, entertainment, and political and charitable donations;
- To be alert for instances of corrupt conduct and immediately report suspected or actual breaches or seek guidance about them;
- To never offer or accept gifts or hospitality (directly or indirectly), if this might impair objective judgement, improperly influence a decision or create a sense of obligation, or if there's a risk it could be misconstrued or misinterpreted by others.
- To never directly or indirectly use company property or funds in any form (including payments or gifts and hospitality), for any unlawful, unethical or improper purpose;

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ANTI-BRIBERY & CORRUPTION POLICY



- To never authorize, make, tolerate, encourage, invite or accept, any bribe or improper benefit to obtain, retain or improve business or a business advantage;
- To never make or request a facilitation payment;
- To never permit anyone to offer or pay bribes or make facilitation payments on behalf of RCR , or to do anything else that we would not be permitted to do ourselves; and
- To never offer or give anything of value to a government official (or their representative) to induce or reward them for acting improperly in their course of their public responsibilities.

This policy applies to all activities undertaken or controlled by RCR.

Bruce James

Chief Executive Officer

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