



Policy for Anti - Corruption

Negri Construction Group, including Hamilton Civil Plant Limited, strictly complies with the anti-corruption principles set out in the laws of the countries where it operates and in its own Anti-Corruption Policy. Negri Construction Group does not tolerate corruption in any form and requires all employees to unequivocally adhere to high standards of business ethics.

Negri Construction Group, including Hamilton Civil Plant Limited, follows an open and honest procurement policy that offers transparent terms of cooperation to potential counterparties. The Group's fundamental norms and requirements include ensuring equal rights and opportunities, not tolerating discrimination and slave labour, diligently avoiding potential conflicts of interest and prohibiting the use of insider information.

Negri Construction Group, including Hamilton Civil Plant Limited, requires all counterparties that work with the Group and/or act on its behalf to comply with applicable anti-corruption laws. All contracts contain a requirement to comply with the principles set forth in applicable laws and international conventions. All counterparties are informed that violations of these cardinal requirements will lead to contract termination.

Negri Construction Group, including Hamilton Civil Plant Limited, has established an effective compliance management function. Together with the business units responsible for monitoring adherence with set business procedures and internal audit service, compliance managers monitor employees' compliance with the requirements of key documents. Negri Construction Group's compliance officer directly reports to the Audit Committee of the Board of Directors about the current situation, as well as about the results of the annual corruption risk assessment.

All violations of established principles and standards are addressed. All reported incidents and hotline calls are investigated, and necessary measures are taken in accordance with applicable legislation and the Negri's internal regulations.

As Director, Quality of Negri I am accountable for the implementation of this policy and I encourage you to commit personally to the principles that drive our success

Director, Quality
E. A. Negri Pty Limited
Hamilton Civil Plant Limited
1 September 2021