

Integrity Policy

Human Resources

Monadelphous Group Limited

i. Purpose

The purpose of this document is to communicate the Company's commitment to the safety, health, and wellbeing of our employees, with a strong focus on building and sustaining a safe and respectful workplace that reflect the highest standards of integrity.

ii. Scope

Unless otherwise stated, this Policy applies to all employees employed by the Company. For this Policy employees include contractors representatives whose terms of engagement require compliance with our Code of Conduct.

This Policy extends to workplace behaviour across our entire work environment including but not limited to our offices, our operations, camps, travel, other workplaces attended in connection with work, and out of work where circumstances of the event can be connected to representing the Company.

iii. Policy

Our Commitment

The Company is committed to ensuring that the decisions and actions taken by our employees and contractors reflect the highest standards of integrity when representing the Company.

As a values-driven organisation, the Company provides a workplace behaviour reporting framework, in which employees, contractors, and members of the public are able to report instances of actual or suspected serious breaches of our Code of Conduct without fear of retribution, victimisation or reprisal, to the extent permitted by the law.

We are committed to acting on all matters raised, treating all matters seriously by investigating and responding with integrity and fairness, and to regularly review the framework to ensure it meets our commitment.

What matters does the Policy apply to?

Unacceptable behaviours that are serious breaches of our *Code of Conduct (BMS-POL-025)* and/or matters that have a significant financial or reputational consequence to the Company. These include but are not limited to; suspected or actual instances of fraud, misappropriation of assets, bribery, corruption or suspected, threatened or actual instances of sexual harassment or assault.

Any matter to which the Whistleblower protection regime applies under legislation should be reported in accordance with the *Whistleblower Policy (BMS-POL-094)*. This includes:

- Any disclosure of alleged misconduct (such as fraud, negligence, default, breach of trust or breach of duty) or an improper state of affairs in respect of the Company or other conduct to which the legislated whistleblower protection regime applies (*Disclosable Matters).

*Refer to *Whistleblower Policy (BMS-POL-094)* for what is a Disclosable Matter.

All other matters which, whilst not a Disclosable Matter, are a material breach of the Company *Code of Conduct (BMS-POL-025)*, *Supplier Code of Conduct (BMS-POL-1004)* or the laws that govern the countries in which the Company operate are reported in accordance with this Policy.

How can a report be made?

It is expected that our employee, contractor, or member of the public will be able to raise most matters directly with a company representative.

If they believe it is not appropriate to discuss the matter with a company representative, or feel that the matter raised has not been adequately addressed, or wish to remain anonymous, they may report the matter to the Monadelphous Integrity Hotline.

The Company's Integrity Committee will be notified consistent with the *Integrity Committee Charter (BMS-GOV-1009)*.

Monadelphous Integrity Hotline

The Monadelphous Integrity Hotline is an external independent service provided by Deloitte. Reports to the Hotline can be made by:

- Phone:** Tollfree (within Australia) – 1800 952 477
Direct dial (for international dialling) – +61 3 9667 3570
- Post:** Monadelphous Integrity Hotline
Reply paid 12628 A'Beckett Street
Victoria 8006
- Email:** MonadelphousIntegrity@deloitte.com.au
- Website:** www.MonadelphousIntegrity.deloitte.com.au
- Fax:** +61 3 9691 8182

All information raised through the Monadelphous Integrity Hotline provided will be treated seriously and dealt with in a sensitive and confidential manner. The Deloitte team are experienced in dealing with unacceptable behaviours, including unethical and unlawful matters and can be contacted 24 hours a day, seven days a week. Deloitte will prepare a report detailing the information they have received, which will be forwarded to a member of the Company's Integrity Committee or delegate for review and action.

All matters raised should be of a genuine concern. Where a matter is found to be raised with malicious, frivolous, or vexatious intent it will be considered a breach of the *Code of Conduct (BMS-POL-025)*. In addition, the behaviour may be an unlawful offence, as a result, the individual may become liable for criminal and/or civil penalties.