



ANTI-BRIBERY & CORRUPTION POLICY

Policy Document

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Intent

Neo Construct values its longstanding reputation for ethical behaviour and integrity. Conducting business with a zero-tolerance approach to all forms of corruption is central to these values, the company's image and reputation. The policy below sets out the standards expected of all employees in relation to anti-bribery and corruption. In particular, all employees must adhere strictly to relevant laws in this area, including the new draft Crimes Legislation Amendment (Combatting Corporate Crime) Bill 2017.

Policy

The Policy is also relevant for third parties who perform services for or on behalf of Neo Construct. Neo Construct expects those persons to adhere to the Policy or have in place equivalent policies and procedures to combat bribery and corruption.

Employees should note that it is a criminal offence to offer, promise, pay, request or accept a bribe. A bribe does not need to be a monetary sum. It can be any form of advantage, offered or received. A contract does not need to have been won for a corruption offence to have been committed. Similarly, a recipient does not need to benefit personally from a bribe. Bribery can occur in the private and public sector.

This policy consists of two straightforward rules that all employees must adhere strictly to:

- › Do not offer, promise or pay bribes.
- › Do not request, agree to or accept bribes.

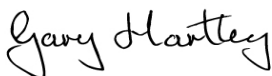
The risks of corruption are not always obvious. Accordingly, employees should follow these principles:

- › Do not make payments to someone (or favour them in any other way) if you know that this will involve someone in misuse of their position (or them performing their functions improperly).
- › Do not misuse your position (or perform your functions improperly) in connection with payments (or other favours) for yourself or others.
- › If in doubt of a perceived personal benefit, ensure that you enter a record in the company's 'gift' register.

Inevitably, decisions as to what is acceptable may not always be easy. If any employee is in doubt as to whether a potential act could give rise to corruption concerns, the matter should be referred immediately to a Neo Construct Director.

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