

# POLICY

## Anti-Bribery and Corruption

### Overview

Schlam <sup>(1)</sup> is committed to acting with honesty and integrity and conducting its business in accordance with all applicable laws and regulations. Bribery and corruption adversely impact the business environment by undermining legitimate business activities.

A breach of anti-bribery or anti- corruption laws is a serious offence that can severely damage Schlam's reputation and result in criminal and civil penalties.

### Propose

Policy affirms Schlam commitment to anti Bribery and Corruption. Clarifies the standards of behaviour that Schlam expects of all employees.

### Scope

All Employees, Directors, Officers and contractors (collectively called "the employees") of Schlam and its subsidiaries must adhere to the policy, regardless of location or role.

The policy defines how employees must conduct themselves whenever they are identified as a representative of Schlam. This may include times when employees are outside of the immediate workplace, working hours, out in the community or at a Schlam event on behalf of Schlam.

### Policy

Each employee is responsible for ensuring they understand their individual requirements contained in this policy.

Schlam lines of defence against bribery and corruption are;

- Avoid gifts given/received unless it is culturally expected
- Gifts issued/received above the value of \$350 require approval executive management (CEO or CFO)
- A system of accountability is maintained for gifts given/received or any incitement from suppliers or other parties that may be in breach of the policy (even if no gift / bribe is given)

The acceptance of gifts, hospitality and entertainment has to be lawful, occasional, of moderate value, not done in return for business services, information or advantage.

Schlam commits to

- Comply with all relevant anti-bribery and anti-corruption laws and regulations
- Educating our employees and stakeholders on the role they play in Schlam's commitment to this Policy
- Prohibit any form of retaliation, discrimination, harassment or intimidation against any person reporting, in good faith, a breach or suspected breach, of this Policy.

We will not directly or indirectly:

- Offer, promise, pay, authorise, accept or request bribes of any form (including facilitation payments and secret commissions)
- Seek to improperly influence the decisions of a public official in any country
- Give or receive benefits, sponsored travel or inducement where the purpose of the provider is to improperly influence a decision or obtain an illegitimate commercial advantage
- Engage in any form of money laundering in connection with our business activities.

Breaches of this Policy, or where in doubt that any conduct is potentially a breach should be reported to your supervisor, manager or where appropriate directly through to the Chief Financial Officer.



**Matthew Thomas**  
Chief Executive Officer (CEO)  
Schlam Group

Schlam <sup>(1)</sup> is a brand of related companies with common shareholders comprising of the following businesses:



<b>Schlam Engineering</b> Pty. Ltd. (ABN 74 145 218 944) now also marketed as Schlam People Solutions	<b>Payload Industries</b> Pty. Ltd. <i>trading as</i> DT HiLoad (ABN 96 611 121 610) now also marketed at Schlam Payload Solutions	<b>The Pilbara Clean Machines</b> Pty Ltd (ABN 15 118 342 895) now also marketed as TPCM
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