

# Anti-Bribery and Corruption Policy

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### 1. Introduction

This Anti-Bribery and Corruption Policy (“the Policy”) applies to all directors, officers and employees (collectively, “you”) of Multiplex Global Limited (collectively “we”, “us”, “our” or “the company”) and its wholly-owned subsidiaries.

This Policy should be read in conjunction with Code of Business Conduct and Ethics (“the Code”), which serves as a guide for how you should conduct yourself as a member of the Multiplex team.

### 2. Zero Tolerance Approach To Bribery

***Do not give or receive bribes, including facilitation payments.***

We value our reputation for conducting business with honesty and integrity. It is vital for us to maintain this reputation as it generates confidence in our business by our customers, clients, investees and other persons – which ultimately means it is good for business.

We do not pay bribes in furtherance of our business and expect that you will not do so on our behalf. We have a zero tolerance approach towards bribery. This commitment comes from the highest levels of management and you must meet this standard.

A bribe is anything of value that is offered, promised, given or received to improperly influence a decision or to gain an improper or unfair advantage in promoting, enhancing, obtaining or retaining business. Bribery may not always be in the form of cash payments and may take many other forms, including:

- Gifts, travel, entertainment and hospitality;
- Political contributions;
- Charitable contributions;
- Employment opportunities, directorships, internships or secondments;
- Procurement and service contracts;
- Phony jobs or “consulting” relationships;
- Excessive discounts or rebates; or
- Non-arm’s length loans, forgiveness of debt or other transactions.

“Facilitation payments” are also a form of bribe and are, therefore, not permitted. Facilitation payments are small payments made to secure or speed up routine actions or otherwise induce public officials or other third parties to perform routine functions they are otherwise obligated to perform, such as issuing permits, approving immigration documents or releasing goods held in customs. This does not include legally required or permitted administrative fees for expedited service.

### 3. Dealing with Public Officials

***Interactions with public officials require enhanced scrutiny and sensitivity.***

A “public official” is any person who is employed by or is acting in an official capacity for a government, a department, agency or instrumentality of a government, or a public international organization. This includes elected or appointed persons who hold legislative, administrative or judicial positions such as politicians, bureaucrats, civil servants, and judges. It also includes persons who perform public functions such as professionals working for public health agencies, water authorities, planning officials and agents of public international organizations, such as the UN or World Bank. A public official may also include employees of government-owned or controlled businesses, including sovereign wealth funds and stated-owned utility companies. For example, if a government has an interest in a bank and exercises control over the activities of that bank, then the banking officials are likely to be considered public officials. Third-parties acting at the direction of these entities and individuals should also be considered public officials.

There is increased sensitivity and scrutiny of dealings with public officials because this has traditionally been an area where bribery activity is more likely to occur. Be cognizant of these risks in your dealings and interactions with public officials and consider how your actions may be viewed. For example, payments, gifts

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or employment to close relatives of public officials may be treated by enforcement authorities as direct payments to the public officials and, therefore, may constitute violations of law.

## 4. Third-Parties

***Joint venture partners, agents, contractors and suppliers are not permitted to pay bribes on our behalf.***

The company may be prosecuted for failing to prevent bribery by a person associated with it. This includes any individual or entity that performs services for or on behalf of the company. Employees should avoid doing business with partners, agents and contractors who do not have a zero tolerance approach to bribery.

This means due diligence should be undertaken on contractors, partners and agents to establish their anti-bribery credentials, where warranted by the assessed level of risk. This could include informing these persons (and associated companies) of the company's anti-bribery policy, meeting with them to better assess their business practices and anti-bribery and corruption policies/controls, and making commercially reasonable inquiries into their reputation and past conduct. In consultation with internal legal counsel, include anti-bribery language in contractor, partner or agency agreements, where appropriate.

## 5. Gifts and Entertainment

***The giving or receiving of gifts and entertainment should be proportionate and reasonable for the circumstances.***

The Gift Limit for each of the Multiplex regions is as follows:

Australia	AUD\$250
Canada	\$250
Europe	£150
UAE	AED 750
Qatar	QAR 750

("Gift Limit")

In respect of Gifts and Entertainment:

- No gifts or entertainment over the Gift Limit must be given or received by any Multiplex employee unless prior approval is obtained from the relevant Regional Managing Director/Head of Country/President of a region and/or the Global CEO or Global CFO.
- In the UK, there is an additional requirement prior to the consent of the Managing Director. In the case of Site based staff you need the consent of the Site's ABC Officer and the Project Director, and if you sit within the corporate function, consent by the Internal Legal Counsel and the Operations Director.
- All gifts in excess of the Gift limit whether given or received must be recorded in a gift register held in the relevant Region. Where possible consent must be obtained prior to receipt or a gift being given. If consent is not given the gift should be returned.
- No gifts are to be given to or received from public officials.
- For the purposes of the Code a gift or entertainment may include free travel, free accommodation, business trips, tickets to events, entertainment and associated hospitality and/or lunches or dinners. It could also include circumstances where you procure donations for a charity that either you or the company supports.
- It is acceptable to accept modest gifts and entertainment from persons doing or seeking to do business with Multiplex, provided the gift or entertainment is given in accordance with generally accepted business practices in the region, is modest in value, i.e. below the Gift Limit, infrequent, appropriate to the business relationship and does not create an appearance of impropriety.

Applications for approval for hospitality or entertainment, being either given or received, are likely to be inappropriate where the request involves:

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- Foreign or regional travel and/or foreign or regional accommodation;
- Its value is in excess of the Gift Limit;
- It has been offered by a sub-contractor/supplier during tender/negotiation phase (i.e. pre-contract where contract anticipated);
- Hospitality where the host does not also attend;
- The gift or hospitality is repetitive; and / or
- An event where the duration exceeds 1 day

Details must be recorded in the appropriate registers held by the Regions Internal Legal Counsel.

## 6. Political Donations and Lobbying

***Do not offer contributions to political parties or candidates that might influence, or be perceived as influencing, a business decision.***

As a general rule no political donations are to be made by any Multiplex employee or Multiplex business.

Any request for a political donation must be approved in writing by the Global CEO and Global CFO prior to the donation being made.

In some Regions attending functions, purchasing raffle tickets or silent auction items or entertaining politicians may be seen as a political donation.

Political donations made by individuals on their own behalf should comply with local laws and regulations. Various countries impose specific restrictions and rules with respect to political contributions, which can carry significant penalties for the company for violations and it is your responsibility to understand the laws applicable to you.

***Do not engage in any lobbying activities on behalf of the company without specific authorisation.***

Multiplex encourages its employees, officers and directors to take an active role in public service. However, any participation in this regard is to be undertaken as an individual and not as a representative of the company.

Lobbying activities generally include attempts to influence the passage or defeat of legislation and it may trigger registration and reporting requirements. In many jurisdictions, the definition of lobbying activity is extended to cover efforts to induce rule-making by executive branch agencies or other official actions of agencies, including the decision to enter into a contract or other arrangement.

You should not engage in lobbying activities on behalf of the company without the prior written approval of the company's internal legal counsel.

Local political contribution policies should be consulted and adhered to before undertaking any lobbying activities in that geography.

## 7. VII. Charitable Donations

***Do not solicit or offer donations to clients, suppliers, vendors, public officials or others in a manner which communicates that a donation is a prerequisite for future business or that the offer of a donation is intended to obtain a business advantage.***

We encourage our directors, officers and employees to contribute personal time and resources to charities and not-for-profit organizations. Multiplex projects are encouraged to consider an appropriate local charity to be the focus for a project and leave a lasting legacy for the local community where the project is located. This is then often supported by our subcontractors and supply chain. It is important that requests for any charitable donation are not prerequisites for future business.

Charitable donations made by individuals on their own behalf should have no relationship to the company business and must comply with local laws and regulations.

If you are requested by a public official to make a personal donation to a particular charity, please consult

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with internal legal counsel before agreeing to or making the donation.

## 8. Record-Keeping

***Record all our transactions in a complete, accurate and detailed manner so that the purpose and amount of the transaction is clear.***

In addition to prohibiting bribery, some anti-bribery legislation requires proper record-keeping and the establishment and maintenance of internal controls. The purpose of these provisions is to prevent companies from concealing bribes and to discourage fraudulent accounting practices.

All transactions must be recorded completely, accurately and with sufficient detail so that the purpose and amount of any such payment is clear. No undisclosed or unrecorded funds or assets of the company should be established for any purpose. False, misleading, or artificial entries should never be made in the books and records of the company for any reason.

## 9. Reports and Complaints

Internal reporting is critical to the company's success, and it is both expected and valued. You are required to be proactive and promptly report any suspected violations of this Policy, or any illegal or unethical behaviour of which you become aware. The confidentiality of reported violations will be maintained to the fullest extent possible, consistent with the need to conduct an adequate review and subject to applicable law. No retribution or retaliation will be taken against any person who has filed a report based on the reasonable good faith belief that a violation of the Policy has occurred or may in the future occur.

The Code provides guidance on reporting complaints, including contact information for our reporting hotline, which is managed by a third-party and allows for anonymous reporting of suspected violations.

## 10. Disciplinary Action for Policy Violations

Please note that we reserve the right to take disciplinary action for Policy violations that fits the nature and particular facts of the violation. This could, in the most severe circumstances, include immediate termination for cause and, if warranted, legal proceedings may be brought against you.

## 11. Ongoing Training

You may be required to complete additional training in respect of this Policy and to acknowledge you have complied with this Policy and the Code.

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## Multiplex Global Reporting Hotline

Australia: 1800 870 742	India: 00 800 9190 946
Europe: 0800 048 8360	Canada: 1-833-753-0830 (English)
Canada: 1-855-350-9393 (French)	UAE (Arabic & English): 800 0320129
Qatar: From an outside line contact your local operator. Request a reverse charge or collect call to be placed to the United States, to the number 704-526-1129. All reverse charge or collect calls will be accepted by the Contact Center using an automated English message	
Web Link: <a href="http://www.multiplex.ethicspoint.com">www.multiplex.ethicspoint.com</a>	

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