

Business Ethics Reporting and Anti-Retaliation Policy



Introduction

ENGIC is committed to conducting business with honesty and integrity. We expect all ENGIC personnel, including directors, officers, employees, workers, consultants and contractors referred to as “you” in this policy, to uphold these standards by acting in accordance with the ENGIC Code of Conduct “Code”, related policies and all applicable laws. We value a culture of openness and accountability. You are encouraged to use our Speak Up resources to report concerns of any known, suspected or potential misconduct.

Purpose

The aims of this policy are to:

- Strengthen our Speak Up culture and ensure you are comfortable reporting concerns;
- Identify ENGIC’s Speak Up resources; and
- Provide reassurance that you can raise any concerns in good faith without fear of retaliation.

Scope

This policy applies to all ENGIC personnel, working at any ENGIC business, including any joint venture companies or consortia that are under ENGIC’s day to day control.

Our Duty to Raise Concerns

Asking questions and reporting known or suspected misconduct benefits and protects us all. We all have a duty to report any unethical, illegal or suspicious activity or concerns that our Code is not being followed. If you are alerted to any Ethics Concerns, it should be promptly escalated to Ethics & Compliance with as much information as possible.

ENGIC Speak Up Resources

Our ENGIC Speak Up resources include:

- your team leader;
- another team leader in your business;
- your local P&O Business Partner;
- ENGIC Legal, Ethics & Compliance; and
- The Ethics email: ethics@engic.ltd

Name Christopher Frost
Position Managing Director
Date January 2023

Confidentiality

ENGIC will do whatever it can to protect the confidentiality of any person making a good faith report - if you receive any information about any report and related investigation you must treat this as confidential.

Reports can be made confidentially via our Speak Up resources or anonymously via the ENGIC ethics email, Anonymous reports must contain sufficient information to enable an effective investigation of the reported activity.

Investigation

ENGIC takes all concerns seriously and is committed to investigating all reports in a consistent manner, as further described in the Ethics Investigation Policy. You are expected to cooperate with all investigations by providing honest, truthful and complete information.

ENGIC strives to resolve all matters internally but nothing in this policy should be interpreted as prohibiting you from reporting, at any time, suspected unlawful conduct to governmental authorities.

Protection from Retaliation

It is ENGIC’s policy that no one making a report in good faith should experience any negative action or discrimination as a result of making their report. This includes threats, intimidation, discrimination, demotion, suspension, reassignment, or any other form of retaliation or victimization. “Good faith” means you must have an honest belief that the information provided is truthful even if the information turns out to be incorrect.

If you believe you have been subjected to any form of retaliation as a result of making a report or assisting in any investigation, or you witness retaliation against someone else, you should report it using the ENGIC Speak Up resources. Allegations of retaliation will be taken seriously and investigated like all other concerns.

Contacts

Any queries in relation to this policy should be directed to the Managing Director.