



**Anti-bribery & Corruption Policy  
TP Engineering Associates**

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Document owner: Lee Ting & Michael Parrello

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**Revision History**

<b>Revision</b>	<b>Date</b>	<b>Description</b>	<b>Originator</b>	<b>Reviewer</b>	<b>Approver</b>
0	2018-12-24	Original Issue	Lee Ting	Lee Ting	M Parrello
1	2025-01-30	Approved For Use	S Hawa	Lee Ting	M Parrello

## 1 Purpose

TP Engineering Associates (TPEA Pty Ltd) is committed to conducting business with integrity, transparency, and accountability. This policy establishes TPEA's zero-tolerance stance on bribery and corruption and sets out the responsibilities of employees, contractors, and representatives in ensuring compliance with ethical business practices.

## 2 Scope

This policy applies to all TPEA employees, including contractors and consultants acting on the company's behalf. It covers all business activities, including interactions with government officials, clients, suppliers, subcontractors, and other third parties.

### 2.1 Objectives

TPEA will:

- a) Prohibit all forms of bribery and corruption, including offering, giving, receiving, or soliciting anything of value to improperly influence business decisions.
- b) Ensure compliance with all applicable national and international anti-bribery and corruption laws and regulations.
- c) Promote a culture of integrity and ethical behaviour through employee training and awareness initiatives.
- d) Implement measures to prevent bribery and corruption, including due diligence on third parties and proper documentation of transactions.
- e) Provide clear guidelines on gifts, entertainment, and hospitality to prevent undue influence on business decision-making.
- f) Encourage employees to report any suspected bribery or corruption without fear of retaliation.

### 2.2 Definitions

**Bribery:** The offer, payment, provision, or receipt of an advantage to improperly secure the performance of any function or duty in both public and private sectors. The advantage may be financial or non-financial, and the bribe may be direct or indirect.

**Corruption:** The abuse of a position of employment, authority, or trust for private gain.

## 3 Reporting Bribery and Corruption

Employees must report any bribery or corruption concerns immediately to the Integrity Committee. No employee will suffer adverse consequences for refusing to participate in or report an act of bribery or corruption.

## 4 Compliance with Laws and Regulations

TPEA is committed to complying with all applicable national and international trade laws, regulations, and restrictions. Employees must not engage in anti-competitive behaviour, exchange sensitive business information, or participate in activities that could imply unlawful coordination with competitors, clients, suppliers, or joint venture partners.

## **5 Conflicts of Interest**

Employees must avoid conflicts between personal interests and business decisions. Employees must not engage in conduct that compromises their ability to make impartial business decisions.

## **6 Gifts, Entertainment, and Hospitality**

Employees must adhere to the Company's Code of Conduct regarding gifts, entertainment, and hospitality. These must never unduly influence business decisions or bring disrepute to those involved.

## **7 Dealings with Third Parties**

TPEA recognises the impact subcontractors, suppliers, and business partners have on its financial performance and reputation. Employees must ensure that:

- a) Third parties are reputable, competent, and qualified.
- b) Compensation reflects fair value for goods and services provided.
- c) Arrangements comply with applicable laws.
- d) No conflicts of interest exist.
- e) Third parties understand and adhere to the Company's Code of Conduct.

## **8 Sponsorships and Donations**

TPEA supports lawful and ethical sponsorships and donations aligned with its business values. Contributions must provide mutual benefit, further the Company's interests, and comply with legal and ethical standards.

## **9 Responsibilities**

- a) Managers, employees and contractors must comply with this policy and report violations.
- b) Managers are responsible for promoting and enforcing ethical business practices.
- c) All employees and contractors must integrate this policy into their daily work practices.

This policy is owned by the Leadership Group of TPEA, staff, and contractors.

A handwritten signature in black ink, appearing to read 'Michael Parrello', with a long, sweeping underline.

Michael Parrello  
Director  
TP Engineering Associates

30/01/2025