

ANTI-BRIBERY AND CORRUPTION POLICY

POLICY STATEMENT

Biglift Crane and Heavy Haulage is a private company in Australia. Biglift Cranes and Heavy Haulage is committed to responsible corporate governance, including ensuring that appropriate processes are in place to promote compliance with anti-bribery and corruption laws in countries where Biglift Cranes and Heavy Haulage operates.

Accordingly, the senior management have endorsed this Anti-Bribery and Corruption Policy to support the Biglift Cranes and Heavy Haulage Code of Business Conduct and our governance framework. References in this Policy to Biglift Cranes and Heavy Haulage include its related entities.

The purpose of this Policy is to Outline Biglift Cranes and Heavy Haulage' position on bribery and other corrupt behaviour. It Outlines responsibilities of Biglift Cranes and Heavy Haulage directors, officers, employees, consultants and contractors (Employees for the purpose of this Policy) in observing and upholding our position on bribery and corruption and promote the use of legitimate business practices in promoting Biglift Cranes and Heavy Haulage' position on issues before government authorities and in the marketplace.

This Policy applies to all Biglift Cranes and Heavy Haulage Employees or any other parties acting as representatives or agents of Biglift Cranes and Heavy Haulage.

SOURCES OF LEGAL OBLIGATIONS

Commonwealth Criminal Code and the Corporations Act 2001 (Australia)

POLICY

Biglift Cranes and Heavy Haulage do not tolerate any form of bribery or corruption. Bribery and corruption involve the misuse of position and influence in return for improper advantage, undermining integrity and fairness of the marketplace. We aim to comply with all applicable anti-bribery and corruption laws in countries where we operate.

IMPROPER EXCHANGES – OFFERING AND RECEIVING

Employees must not offer, promise, receive or engage another party to offer, promise or receive anything of value (cash, loan, gift, hospitality, personal/family/social/sporting/cultural favour or other financial or non-financial advantage) for the purpose of inducing or rewarding a discretionary favourable action or the exercise of influence, regardless of country, public or private sector or person concerned. The payment or receipt of secret or undisclosed commissions is strictly prohibited.

Payments to government officials or other intermediaries to facilitate or accelerate a routine non-discretionary activity (otherwise known as facilitation payments), such as obtaining a licence or a permit, are also prohibited. Employees will not suffer adverse consequences for refusing to make an improper payment even if this may result in Biglift Cranes and Heavy Haulage losing business.

EXTORTION

Biglift Cranes and Heavy Haulage also condemn improper demands for payment from Employees, referred to in many parts of the world as "extortion." A payment can be made where an Employee reasonably believes that his/her or another's life or health is at risk unless a demand for payment is met, provided the Employee immediately reports the incident to the General Manager. Absent an immediate threat to life or health, where

an improper demand for payment has been made under threat of confinement or serious destruction of company property, the General Manager should be contacted immediately for guidance.

GIFTS, DISCOUNTS AND HOSPITALITY

Exchanges of gifts, discounts or hospitality (including customer travel and accommodation) made in the ordinary course of business may compromise or appear to compromise, the exercise of objective business judgment. These may also give rise to conflicts between the personal interests of Employees and the interests of Biglift Cranes and Heavy Haulage. Employees must be cautious when offering or receiving gifts, discounts or hospitality, and only do so where these are;

- Token, seasonal or due to a special occasion or local custom, and in line with accepted business practice, and
- Not seen to impair independent business judgment, particularly in connection with an anticipated or pending business transaction or regulatory approval.

When dealing with private or publicly-listed business partners, an employee must not accept or offer gifts and hospitality valued at over AUD\$250 at any one occasion. Multiple exchanges of gifts and hospitality under this threshold with the same person should also be avoided. Where in doubt, Employees must consult with the General Manager who has absolute discretion to approve hospitality or gifts over this threshold if appropriate and permissible by law. Such gifts and hospitality are recorded in a gifts and hospitality exemptions register.

CHARITABLE DONATIONS

Biglift Cranes and Heavy Haulage supports a number of charitable causes around the world including by making charitable donations, without expectation or acceptance of favourable action or the exercise of influence. In limited circumstances, a charitable donation may pose a risk of corruption, for example by being made to an artificial charitable organisation, or ultimately benefiting a third party such as a government official.

To address this risk, charitable donations on behalf of Biglift Cranes and Heavy Haulage must:
Be made only to approved not-for profit organisations whose goals reflect Biglift Cranes and Heavy Haulage' values

- Be approved only by authorised Employees
- Be accurately recorded in business records of the company
- Be tax-deductible
- Not be made to individuals or for-profit organisations, and
- Not be made in cash or to private accounts.

Authorisation of charitable donations must only be made within relevant authority limits and is subject to the General Manager's approval.

SPONSORSHIPS

Sponsorships differ from charitable donations in that, apart from providing a benefit to the organisation, event or activity being sponsored, they are also aimed at obtaining a marketing benefit for Biglift Cranes and Heavy Haulage. Sponsorships can create problems where they are seen to improperly induce or reward a discretionary favourable action or the exercise of influence.

Biglift Cranes and Heavy Haulage will not sponsor events or activities that are:
Inconsistent with Biglift Cranes and Heavy Haulage' values and the Code of Business Conduct, and/or linked to any organisations or individuals that could bring Biglift Cranes and Heavy Haulage into disrepute.

Authorisation of sponsorship arrangements must only be made within relevant authority limits and is subject to the General Manager's approval.

MAINTAINING BUSINESS RECORDS

In accordance with the Biglift Cranes and Heavy Haulage Code of Business Conduct, Employees must keep complete and accurate business records, including financial, human resources, payroll and environmental records, and not create false, misleading or artificial entries to conceal improper payments or corrupt activity. All applicable control and approval procedures must be followed.

All expenses relating to gifts and hospitality provided by Biglift Cranes and Heavy Haulage must be accurately recorded, with reasonable detail, in the business records of the company.

TRAINING AND COMMUNICATION

Biglift Cranes and Heavy Haulage regularly communicate this Policy to Employees across Biglift Cranes and Heavy Haulage through our established communication channels. Employees will also receive regular training on supporting this Policy in the scope of their employment with Biglift Cranes and Heavy Haulage.

CONSEQUENCES FOR BREACH OF THIS POLICY

Bribery and corruption are very serious offences under local and international laws. Breach of this Policy by Employees:

Could expose such person to severe criminal (a fine or imprisonment or both) and civil liability (a financial penalty and liability for damages), and will be regarded by Biglift Cranes and Heavy Haulage as serious misconduct which will lead to disciplinary action, including termination of employment or contract.

AUTHORISED BY

Name: Billie Sharp

Position: General Manager

Date: 25/10/2018

Signed:

