



This policy covers all subsidiaries of the Degnan Group Pty Ltd, including Degnan Constructions Pty Ltd, Degnan VIC Pty Ltd & Degnan QLD Pty Ltd (within this document Degnan refers to Degnan Group Pty Ltd and it's Subsidiaries.)

This Probity Policy outlines Degnan's commitment to probity and provides guidance for all employees to ensure the consistent practice of ethical conduct across the organisation.

Degnan is committed to:

- Ensuring that each individual member of Degnan undertakes their duties with the highest standards of probity, integrity, transparency, and act in an ethical manner.
- Guide and regulate all employees of Degnan must act in a manner that is:
 - o Ethical demonstrate honesty, trustworthy, and integrity. Upholding high ethical standards of professionalism, in all aspects of their functional duties.
 - o **Respectful** respect all people, including their rights and their heritage.
 - Accountable maintain accountability for actions and decisions made within the framework of its functional responsibility, ensuring that they align with the Company's policies and procedures, relevant laws, regulations, and ethical standards.
 - o Impartial being apolitical and provide others with advice that is frank, honest, timely and based on the best available evidence.
 - o Fair ensuring that all parties are treated equitably, with no bias or favouritism, avoid engaging in any improper use of their position.
 - o **Transparent** behave in an open and transparent manner, information is clearly communicated to all participants.
 - o Confidential safeguard sensitive information provided by others and maintaining its confidentiality, protecting trade secrets, intellectual property and proprietary information.
 - o Non-Discriminating treat all individuals equally, without any form of discrimination based on factors such as race, gender, nationality, or personal connections.
 - Free from Conflict of Interest identifying and managing any conflicts of interest, ensuring that they do not compromise fairness or impartiality.
- fostering a culture of probity and ensuring that all employees are aware of and comply with this policy.

All employees are expected to familiarise themselves with this policy, adhere to the principles of probity, and report any suspected breaches or unethical conduct.

Compliance with this policy will allow Degnan's commercial partners, including clients, suppliers, and subcontractors to jointly advance their business objectives in a fair and ethical manner.

This policy is available to all interested parties as appropriate.



Chris Degnan

Managing Director

Degnan Constructions Pty Ltd