

Anti-Bribery and Corruption Policy



OGS Global is committed to conducting business with integrity based on ethical standards, honesty and in compliance with the laws and regulations of the countries in which we operate.

All personnel, inclusive of contractors representing OGS Global are required to:

- be committed to acting professionally, fairly and with integrity in all business dealings and relationships;
- understand and comply with the law, and
- avoid even the appearance of impropriety.

OGS Global imposes a zero-tolerance approach to bribery and corruption and expects all personnel and service providers to abide by this policy. All personnel, regardless of position, are held accountable for acting in an ethical and lawful manner, consistent with our code of conduct.

All personnel have a duty to help detect, prevent and report bribery and corruption. Personnel must report any breaches of this policy, or suspicious conduct including behaviour that makes them feel under pressure to engage in improper conduct that may constitute bribery or corruption. Reports can be made to the CEO in the first instance, or if it is appropriate to do so, the Board can be notified.

OGS Global will support anyone who raises a genuine concern, and investigate in good faith under this policy, without fear of reprisal.

Whilst there are many scenarios that will constitute a breach of this policy the below is a non-exhaustive list of items that are prohibited:

- offer, or give an offer of a payment, gift or hospitality to a third party with an expectation that a business advantage will be received, or to reward a business advantage already given;
- request, agree to receive or accept payment or offering from a third party knowing or suspecting it is offered with the expectation that it will obtain a business advantage for them;
- threaten or retaliate against other personnel who refuse to commit a bribery offence or who has raised concerns under this policy;
- offer payment solicitation or accept bribes, inducements, secret commissions or similar payments in any form;
- buy unnecessary or inappropriate goods and or services or structure a transaction to conceal or misrepresent the involvement of a party to a transaction.

The OGS Board and Executive Management will enforce this policy throughout all our business dealings. We expect our business partners and agents to implement and enforce effective systems to counter bribery.

Any breach of this policy may be regarded as serious misconduct, resulting in disciplinary action or termination of employment or contract. A breach of this policy may also expose an individual to criminal and civil liability and could result in imprisonment or significant financial penalty.

A handwritten signature in black ink that reads "Jason Antunovich".

Jason Antunovich
Chief Executive Officer