



## CORPORATE GOVERNANCE ANTI-BRIBERY AND CORRUPTION POLICY

The Company is committed to operating fairly and ethically, in compliance with all applicable laws including anti-corruption laws of every country in which the Company may operate.

The Company is committed to a zero-tolerance approach to bribery and corruption. The Company's reputation is built on its values as a company, the professionalism of its employees and the collective commitment of its personnel to act with integrity, accountability and transparency at all times.

### **Scope**

This Anti-Bribery and Corruption Policy (Policy) extends to all the Company's business dealings and transactions. All directors, officers and employees of the Company (Company Personnel) are required to comply with this Policy.

Bribery and corruption undertaken by anyone acting on behalf of the Company is strictly prohibited.

### **General Prohibition**

The following rules are to be strictly complied with by all Company Personnel:

- never offering, paying, soliciting or accepting bribes in any form (including facilitation payments);
- never offering or accepting any item, money, travel, hospitality, entertainment or other token of appreciation that may be construed as or used by others to allege favouritism, discrimination, collusion or similarly unacceptable practices;
- never engaging in any form of corrupt business practice, whether for the benefit of the Company, Company Personnel or another party;

### **Responsibility**

All Company Personnel, vendors, contractors, consultants and other business partners are expected to read, understand and adhere to this Policy and all related guidelines, policies and procedures.

The Company undertakes to take all reported concerns seriously and where appropriate will investigate reports of bribery and corruption in any way connected to the Company or a related entity.

All Company Personnel have a responsibility to, and are encouraged to, prevent and help detect, bribery and corruption. Company Personnel are encouraged to raise any concerns through established reporting channels about any behaviour that violates this Policy.

This Policy is to be reviewed annually.