

## Purpose

KGL Resources Limited and its subsidiaries have a zero-tolerance for and strictly prohibits Bribery and Corruption in all business dealings, in every country it operates or procures business or supplies from.

Bribery involves making a payment or otherwise offering, promising, or discussing a benefit, advantage or inducement to any person deliberately to distort a proper decision-making process, to influence a person's decision, to encourage them to secure an improper commercial advantage, or to enter into a dishonest arrangement.

Corruption occurs when one individual offers or gives a benefit (i.e. a bribe) to another individual in exchange for an undue favour. A bribe is corrupt whether it is given directly or through a Third Party.

## Objectives

### **KGL is committed to and accountable for:**

- Never offering, paying, soliciting or accepting bribes, including facilitation payments in any form, directly or indirectly, to or from officials, private company executives or any other individual or entity.
- Not engaging in money laundering or approve any offers, or make, accept or request any irregular payment or other thing of value, to win business, influence a business decision or secure an improper advantage.
- Never engaging in any form of corruption whether for the benefit of KGL or Third Party.
- Never offering or accepting an item, money, travel, hospitality, entertainment or other token of appreciation that may be construed or used by others to allege favouritism, discrimination, collusion or similarly unacceptable practices.
- Developing and implementing a detailed procedure based on this Policy and providing training for staff on the application of the procedure.
- Developing and implementing an audit and review processes that ensure business associates comply with this Policy.
- As part of the procedure, implementing a process to conducting periodic anti-Bribery assessments of our business to detect potential misconduct and monitor compliance with anti-Corruption laws and policy.
- Maintaining detailed and accurate business records and internal controls.

## Accountabilities

### KGL employees and contractors are accountable for:

- Ensuring that they comply with the Company's policies and procedures in relation to Anti-bribery and Corruption.
- Report any concerns they have about Anti-bribery and Corruption to their Manager or another senior staff member.
- Ensuring that this Policy is a consideration in any activities that are undertaken.
- Ensuring that staff, contractors and other persons at the workplace understand their obligations in relation to this Policy
- As Managers, to promote this Policy within their area of responsibility and take steps to ensure that any breaches or potential breaches of this Policy are identified, taken seriously and acted upon immediately
- Understanding this policy and seeking clarification from management where necessary



**Denis Wood**  
Executive Officer

29 August 2023



**INTEGRITY**  
We do what we say



**ACCOUNTABLE**  
We own our actions



**RESPECTFUL**  
We act with dignity



**SUSTAINABLE**  
We achieve robust outcomes

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