

## **Anti-bribery and Corruption Policy**

### **The Purpose of this Policy**

The purpose of this policy is to establish controls to ensure compliance with all applicable anti-bribery and corruption regulations, and to ensure that the Cyprium Metals Limited's (CYM) business is conducted in a socially responsible manner.

### **Policy Statement**

Bribery is the offering, promising, giving, accepting or soliciting of an advantage as an inducement for action which is illegal or a breach of trust. A bribe is any financial or other advantage which is offered, provided, authorised, requested or received as an inducement or reward for the improper performance of their relevant function, or the receipt of which in itself would constitute improper conduct.

It is our policy to conduct all of our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption. We are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate and implementing and enforcing effective systems to counter bribery.

We will uphold all laws relevant to countering bribery and corruption in all the jurisdictions in which we operate. However, we remain bound by the laws in Australia in respect of our conduct both at home and abroad.

Bribery and corruption are punishable for individuals by imprisonment and fines. If we are found to have taken part in corruption, we could face fines and face damage to our reputation. We take our legal responsibilities very seriously.

### **Scope**

This policy applies to all Board members, officers, managers, employees, contractors and consultants (Personnel).

This policy covers:

- Bribes;
- Facilitation payments;
- Political contributions and activities;
- Gifts and hospitality; and
- Charitable contributions.

Personnel must immediately report any actual or suspected breaches of this Policy to the Non-executive Chairman, Executive Director or Company Secretary.

## **Anti-bribery and Corruption Policy**

### **Bribes**

Employees must not engage in any form of bribery, either directly or through any third party (such as an agent or distributor). Specifically, employees must not bribe a public official in Australia or anywhere in the world.

### **Facilitation payments**

Facilitation payments are a form of bribery made for the purpose of expediting or facilitating the performance of a public official for a routine governmental action, and not to obtain or retain business or any improper business advantage. Facilitation payments tend to be demanded by low level officials to obtain a level of service which one would normally be entitled to.

All dealings with public officials must be transparent and we must wary of circumstances where it could be seen to be inducing a public official to perform their work improperly. Our strict policy is that facilitation payments must not be paid.

### **Political contributions and activities**

We do not permit any of our funds and resources to be used as a contribution towards a political campaign, political party, political candidate or any affiliated organisations. We will not use charitable donations as a substitute for political payments.

### **Gifts and Hospitality**

Personnel must not offer or give any gift or hospitality:

- Which could be regarded as illegal or improper, or which violates the recipient's policies;
- To any public employee or government officials or representatives, or politicians or political parties; or
- Which exceeds \$50 in value for each individual gift unless approved in writing by the Executive Director.

Employees may not accept any gift or hospitality from our business partners if:

- It exceeds \$50 in value for each individual gift unless approved in writing by the Executive Director;
- It is in cash; or
- There is any suggestion that a return favour will be expected or implied.

### **Charitable contributions**

Charitable support and donations are acceptable, whether of in-kind services, knowledge, time, or direct financial contributions. However, Personnel must be careful to ensure that charitable contributions are not used as a scheme to conceal bribery. We only make charitable donations that are legal and ethical under local laws and practices. No donation must be offered or made without the prior approval of Executive Director or Company Secretary. All charitable contributions should be publicly disclosed.