

ANTI-BRIBERY & CORRUPTION POLICY



ALLIANCE MINING COMMODITIES LTD (AMC) IS COMMITTED TO THE HIGHEST STANDARDS OF ETHICAL BUSINESS CONDUCT.

POLICY

Compliance with legislation is viewed as minimum standard of conduct, and that appropriate standards of conduct are expected to be higher than those prescribed in legislation.

AMC acknowledges that bribery and corruption are universally recognised as unacceptable abuses of power, and that their impact distorts international trade flows as well as undermining the social and economic development of emerging nations.

The purpose of this policy statement is to set standards of behaviour expected in business dealings with external parties in relation to the provision of any form of benefit in order to:

- Promote compliance with relevant laws in the countries AMC operates in;
- Ensure that AMC protects and maintains its business reputation and integrity to the highest standard.

Bribery is an act of offering, promising or giving a financial or other advantage to someone with the intent of inducing the receiver or another person to perform improperly a relevant function or activity or to reward a person for the improper performance of such a function or activity.

A facilitation payment is the payment of a benefit with a monetary value to another person for the sole or dominant purpose of expediting or securing the performance of a routine administrative action.

Bribery in all its forms is strictly prohibited conduct including facilitation payments.

AMC will keep financial records and have appropriate internal controls in place which will evidence the business reason for making payments to external parties.

AMC personnel including employees, consultants, contractors and directors are required to comply with this policy and any applicable anti-bribery legislation.

Any AMC personnel who becomes aware of a possible breach of this policy or anti-bribery legislation is obliged to report the matter to their manager, the HR function or to the Company Secretary by sending an email to hr@amcbaumite.com. All reports on this matter will be treated in confidence.

A handwritten signature in black ink, appearing to read 'Paul Kopejtka', is written over a light grey curved line that spans across the bottom right portion of the page.

Paul Kopejtka

MD/CEO

03 02 2020