



# Anti-Bribery & Anti-Corruption Policy

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**Document Owner** HUMAN REOURCES MANAGER  
**Department** HUMAN RESOURCES (HR)  
**Authorized by** MANAGING DIRECTOR

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## UNCONTROLLED COPY WHEN PRINTED

Ora Banda Mining Ltd ("**Ora Banda**" or "**the Company**") is committed to complying with the laws and regulations of the countries within which it operates and ensuring that all of the Company's business operations are conducted in accordance with this primary requirement.

This Policy applies to all Ora Banda directors, officers, employees and contractors (OBM Personnel) and has been created to provide clarity on the Company's Anti-Bribery & Anti-Corruption expectations.

All OBM Personnel must:

- Avoid personal, financial or other interest which may conflict with their duties and responsibilities to Ora Banda. Any interest which may constitute a conflict of interest must be promptly disclosed to that person's direct manager or an appropriate senior manager.
- Not offer, promise, give, demand or accept any undue advantage, whether directly or indirectly, to or from:
  - A public official;
  - A political candidate, party or party official;
  - A community leader or other person in a position of public office or trust; or
  - Any private sector employee in order to obtain, retain or direct business or to secure any other improper advantage in the conduct of business.

Ora Banda prohibits the giving or receiving of gifts, or invitations involving travel, accommodation and entertainment in circumstances which **could** be considered to give rise to a conflict of interest or be seen as undue influence.

Ora Banda supports an open environment where employees can raise matters related to this policy in an appropriate and if required, anonymous manner.

Any material breach of this policy will be reported to the Board.

Failure to comply with the requirements of this policy will be investigated appropriately and action will be taken in accordance with Ora Banda's Counselling, Disciplinary and Termination Procedures.

This policy will be subject to review as relevant legislative and corporate governance requirements change. As a minimum this policy will also be reviewed every two (2) years.

David Quinlivan  
Managing Director

**For Further Information** please contact your Departmental Manager or the Human Resource Manager.