

Anti-Bribery and Corruption Policy



Ansarada Anti-Bribery and Corruption Policy

Purpose

This policy has been created to ensure compliance with anti-bribery and corruption laws and regulations that may exist wherever Ansarada Group Limited (**Ansarada Group** and/or the **Company**) operates, and to ensure Ansarada Group operates in a manner that may be fairly considered as socially responsible.

Policy Statement

The Company has zero tolerance for bribery and corruption and is committed to ensuring its corporate culture actively discourages corrupt conduct in the strongest possible terms. The Company is expected to meet the highest ethical standards in line with the anti-bribery and corruption standards required by the Australian Securities Exchange (**ASX**). Serious criminal and civil penalties, as well as reputational damage, may be incurred if the Company or an employee is involved in bribery or corruption.

This Anti-Bribery and Corruption Policy (**Policy**) sets out the Company's standards and guidelines on:

- (a) what constitutes bribery or corruption;
- (b) offering, accepting and providing gifts and hospitality;
- (c) participating in tenders and procuring goods and services; and
- (d) providing donations and sponsorship.

This Policy also outlines the process to follow if there are concerns that any employee, non-executive director, contractor or agent of the Company is not complying with this policy.

This Policy is consistent with and supports the Company's values as referred to on its website.

It is the mission of Ansarada Group that any and all business is carried out in a legal, honest, and ethical manner. Ansarada Group takes a zero-tolerance approach to bribery, and acts in a socially responsible, ethical, and compliant manner at all times. To this end, we have implemented enterprise-wide compliance systems to ensure we 'walk the talk', and we also rely upon continual improvement type activities to further enhance the goodwill associated with our name.

The purpose of this policy is to:

- a) ensure that the Company, as a minimum, complies with its obligations under the Corporations Act 2001 (Cth) (Corporations Act), the ASX Listing Rules and ASX Corporate Governance framework and as much as possible seeks to achieve and exceed best practice;
- b) educate Employees on what gifts, entertainment, hospitality and other benefits are acceptable and unacceptable;
- c) ensure the Company complies with the ASX's Anti-Bribery and Corruption policy along with its broader risk management framework; and
- d) promote investor confidence in the integrity of the Company and its securities.

Any and all material or suspected breaches of this policy must be immediately reported to the Company's Board or a committee of the Board upon identification.

Scope

Who is covered by this policy?

In this policy, a 'third party' refers to any entity that any individual or corporate entity working for Ansarada Group may be exposed to, either directly or indirectly, through the work of Ansarada Group. Examples of such third parties include, but are not limited to actual and potential clients, suppliers, distributors, business contacts, agents, advisers, and/or government and other public bodies of any nature.

This policy shall at all times apply to any and all individuals directly or indirectly working for Ansarada Group in any capacity, shall apply regardless of level or grade, and shall apply regardless of whether such work is of an employee, contractor, agency, intern, sponsor, trainee, secondment, or consultant status. For the avoidance of doubt, any individual performing any service for Ansarada Group shall be considered as subject to this policy.

Bribes

Bribery is the offering, promising, giving, accepting, and/or soliciting of an advantage as an inducement for action, in any way that may be considered illegal or a breach of trust. Additionally, bribery may be described as an inducement or reward offered, promised or provided to gain any commercial, contractual, regulatory or personal advantage, where such inducement or reward cannot be fairly considered as typical within the commercial environment in which Ansarada Group operates, or falls afoul of any laws or regulations within such operative environment.

No individual or corporate entity working for Ansarada Group shall be permitted at any time to engage in bribery, either directly or indirectly (eg. through a third party such as an agent or distributor). As a specific reference, no individual or corporate entity working for Ansarada Group shall be permitted at any time to bribe a Foreign Official anywhere in the world.

Gifts and Hospitality

Ansarada Group recognises that the accepting of gifts or hospitality may in respectable circumstances be customary and may comply with local business practices. Of course, what is respectable may vary across countries, regions, and industries, and accordingly Ansarada Group agrees the matter should be approached with a conservative and prudent mindset.

As a general and guiding set of principles, no individual or corporate entity working for Ansarada Group may at any time offer any gift or hospitality that:

- i) could reasonably be construed as acting to improperly influence the performance of, or general function of Ansarada Group; or
- ii) is not made in the spirit of general relationship building only; or iii) could be considered as illegal or improper, or that in any way violates the recipient's policies; or
- iv) is not made in an open and transparent manner; or
- v) is made in the form of cash, loans, or cash equivalent; or
- vi) is made to any public employee or government official or representatives, or politicians in political parties; or
- vii) exceeds a value that exceeds any financial limit that has previously been set by the Senior Management of Ansarada Group, and communicated to the organisation in writing. Whilst this policy does not dictate what should be communicated as acceptable by Senior Management, there is a general suggestion that a limit of AUD 500, as a rule of thumb measurement, would ordinarily be an appropriate suggested upper limit.

It is understood that from time to time, it may not be practical to decline an offer or gift that breaches

the above requirement. In such an event, the gift should be accepted, and then declared to the Senior Legal Risk & Compliance Specialist. The gift will accordingly be donated to charity.

Facilitation payments and kickbacks

Facilitation Payments are generally considered as a form of bribery made for the purpose of expediting or facilitating the performance of a public official or routine government action.

Ansarada Group has a strict policy in place that such Facilitation Payments shall never be made under any circumstances.

Political Contributions

No individual or corporate entity working for Ansarada Group shall under any circumstances make any donation, whether directly or indirectly (eg. through a third party such as an agent or distributor), in support of any political party, political movement, or candidate.

Charitable Contributions

Ansarada Group acknowledges that charitable support and donations are acceptable, and that support and donations may take several forms, such as direct financial assistance, or donation of time and knowledge. Ansarada Group does emphasise however that any individual or corporate entity working for Ansarada Group shall do all that is necessary to ensure such charitable activities do not act as a 'front' for bribery type activities.

Tenders and Procurement

In relation to tenders and procurement for services to be provided to the Company, all Employees are expected to act with a high degree of professional integrity and in accordance with the Company's Code of Conduct.

The following requirements are designed to assist you in your negotiations with external parties including suppliers in order to avoid conflicts and unethical behaviour.

All material and potential conflicts of interest in relation to any particular tender or procurement process must be declared immediately and consent must be obtained from either the Responsible Officer before proceeding or continuing to proceed with the process. Further:

- (a) all tenders and procurement processes must be conducted fairly and transparently;
- (b) there must be no favour or undue preference to any supplier at the expense of the Company;
- (c) no personal benefit should be received, directly or indirectly, in connection with the tender or procurement process; and
- (d) the tender and procurement process must be appropriately documented (to identify why the provider was ultimately selected).

Your responsibilities

You must ensure that you read, understand, and comply with this policy.

You must notify the Senior Legal Risk & Compliance Specialist in the event you believe or suspect that a conflict or breach of this policy has occurred or may occur in the future.

Any individual or corporate entity working for Ansarada Group that breaches this policy shall be subject to disciplinary action, with this action potentially including actions up to, and including dismissal, and/or permanent removal from supplier listing. Note also that when legally compelled to, Ansarada Group may report such breach to regulatory authorities.

Record Keeping

Ansarada Group may keep on hand financial records and keep appropriate records in place to evidence the reasoning behind the making of payments or donations to third parties. At no time shall items be kept 'off the books. Additionally, the Senior Legal Risk & Compliance Specialist shall keep all records on hand of any suggestion of improper behaviour, as well as relevant corrective action.

Any individual or corporate entity for Ansarada Group must declare and keep on hand a written record of all hospitality or gifts accepted or offered, even if this hospitality or the gifts comply with this policy. This will from time to time be subject to managerial review.

How to raise a concern

Any concerns of any nature – real or perceived – shall be directed immediately to the Senior Legal Risk & Compliance Specialist. In the event of any Whistleblower type activity, the identity of that Whistleblower activity shall be protected in accordance with relevant laws and regulations. Please also be aware that any individual who becomes aware of any activity that falls afoul of this policy is compelled to report such activity as soon as is practical.

The Senior Legal Risk & Compliance Specialist will have day to day responsibility for administering this policy. Consequently, the Senior Legal Risk & Compliance Specialist will report all matters arising under this Policy which they are involved in to the Company Secretary.

The Company Secretary will maintain a complete register on the matters arising under this Policy and will report to the Board accordingly. The directors and CEO may inspect this register as requested.

Communication

Communication of this policy shall be provided to Ansarada Group's stakeholders, as required. Additionally, internal training may occur from time to time, and as determined by Ansarada Group.

Who is responsible for this policy?

The Senior Legal Risk & Compliance Specialist will have day to day responsibility for administering this policy and the Board of Ansarada Group have ultimate responsibility for ensuring this policy complies with our legal and ethical responsibilities.

Penalties and consequences

The civil, criminal and financial penalties for bribery offences can potentially be significant and serious for Employees and the Company. There is a real risk that individuals involved may also be subject to imprisonment.

The impacts of Bribery and Corruption extend beyond the civil and criminal penalties to include:

- (a) impacting on Company reputation and the Company's ability to procure and retain business;
- (b) impacting on the Company's ability to do business with governments or public international organisations which may require a declaration that the Company has, and will, comply with certain laws;
- (c) increased regulatory scrutiny and prosecution of the Company and/or its subsidiaries; and
- (d) potential breach of certain established contractual provisions relating to compliance with applicable anti-bribery and corruption laws, which may trigger termination rights, penalties or litigation.

Monitoring and Review

The Board of Ansarada Group shall monitor the suitability and effectiveness of this Policy and shall review the same from time to time. Any improvements identified shall be made as soon as possible.

All stakeholders of Ansarada Group are responsible for the success of this Policy and are invited to make suggestions as to potential enhancement.

Approved and Adopted

This Policy was approved and adopted by the Board on 24 April 2023.