



## ANTI BRIBERY & CORRUPTION POLICY

Musgrave Minerals Limited (**Musgrave**) is committed to operating fairly and ethically, in compliance with all applicable laws including ant-corruption laws of every country in which we operate.

Musgrave is committed to a zero-tolerance approach to bribery and corruption. Our reputation is built on our values as a company, the professionalism of our employees and our collective commitment to acting with integrity, accountability and transparency at all times.

### **Scope**

This Anti-Bribery and Corruption Policy (**Policy**) extends to all Musgrave's business dealings and transactions. All directors, officers and employees of Musgrave are required to comply with this Policy.

Bribery and corruption undertaken by anyone acting on behalf of Musgrave is strictly prohibited.

### **General Prohibition**

The following rules are to be strictly complied with by **ALL** directors, officers and employees:

- Never offering, paying, soliciting or accepting bribes in any form (including facilitation payments);
- Never offering or accepting any significant item, money, travel, hospitality, entertainment or other token of appreciation that may be reasonably construed or used by others to allege favouritism, discrimination, collusion or similarly unacceptable practices<sup>1</sup>;
- Never engaging in any form of corrupt business practice, whether for the benefit of Musgrave, yourself or another party;

### **Responsibility**

All Musgrave, employees, vendors, contractors, consultants and other business partners are expected to read, understand and adhere to this Policy and all related guidelines, policies and procedures.

Musgrave takes all reported concerns seriously and where appropriate will investigate reports of bribery and corruption in any way connected to Musgrave or a related entity.

All employees have a responsibility and are encouraged to prevent and help detect bribery and corruption. Employees are encouraged to raise any concerns through established reporting channels about any behaviour that violates this Policy.

This policy is to be reviewed **annually**.

<sup>1</sup> For the purposes of this Policy the threshold requiring disclosure to management personnel or the Board in the case of management personnel is AUD \$1,000