

# Anti-Bribery and Corruption Policy

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## Policy Statement

The Board of Gold Corporation is committed to sound corporate governance principles and high standards of legislative compliance and ethical behaviour in our dealings both domestic and overseas.

It is Gold Corporation's policy to conduct all our business in a professional, honest and ethical manner.

This policy applies in all countries that Gold Corporation trades with or has representation. Where local laws are stricter than this policy or those of Australian laws then the stricter rules must be complied with.

## Zero tolerance approach

Gold Corporation takes a zero tolerance approach to Bribery and Corruption in all its forms, including, but not limited to:

- Active Bribery or Passive Bribery;
- Corruption, including nepotism;
- Internal fraud; and
- Facilitation Payments;

Gold Corporation is committed to acting professionally, fairly and with integrity in all its business dealings. No Employee or other relevant party acting on behalf of Gold Corporation shall offer, provide, authorise, request, accept or receive a bribe, either directly or indirectly.

We will not engage in Bribery and Corruption with any counterparties in any of the jurisdictions with which we trade and will comply with applicable laws of other countries. We remain bound by local and national laws, and our own ethical standards.

It is expected that the partners with which we do business apply the same zero tolerance approach.

In order to ensure no actual, potential or perceived bribery occurs, it is expected that Gold Corporation Employees do not:

- Offer Benefits to third parties without prior approval;
- Offer cash payments or kickbacks to third parties;
- Try to influence the outcome of bids, tenders or contracts by offering a Benefit;
- Procure another person to undertake a bribe on your behalf.

## Gifts, Benefits and Hospitality

The provision and/ or receipt of a Benefit to/ from third parties is a common business practice, however such activity must comply with Gold Corporation's policies.

Employees are prohibited from accepting a Benefit from or giving a Benefit to a business counterparty in the following circumstances:

- It is made with the intention, or could be perceived to be made with the intention, of influencing a third party to obtain or retain business, to gain a business advantage, or to reward the provision or retention of business or a business advantage, or in explicit or implicit exchange for favours or benefits;
- It includes cash or a cash equivalent (i.e., gift certificates and gift vouchers);
- It is of an inappropriate type and/ or value and given at an inappropriate time (i.e., during a tender process or contract negotiations); and/ or
- It is given secretly and not openly.

The business practice of giving Benefits varies between countries and regions and what may be acceptable in one jurisdiction may not be so in another. The test to be applied is whether in all circumstances the Benefit is reasonable, justifiable and is proportionate, and is given or received with the right intention.

## Policy Breaches

If an Employee believes, on reasonable grounds, that any person within Gold Corporation or its related parties is involved in activities that may constitute Bribery or Corruption, that Employee has a duty to report the matter. The Employee may disclose the matter directly to their manager if appropriate and /or via the process described in the Gold Corporation Whistleblowing Policy.

Where it is suspected on reasonable grounds that an Employee of Gold Corporation is undertaking activity which may constitute Bribery or Corruption, the matter will be investigated.

If allegations of Bribery and Corruption are found to be true, and an Employee has participated in an act of Bribery or Corruption, the matter may be considered serious misconduct in accordance with the Gold Corporation Code of Conduct. Disciplinary action may occur as a result.

## Policy Governance

The Board of Gold Corporation has the overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all persons under Gold Corporation's control comply with it.

Management at all levels within Gold Corporation are responsible for ensuring that those Employees reporting to them are made aware of and understand this policy. Adequate and regular training shall be provided to Employees in order to ensure ongoing compliance with this Policy.

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## Definitions

### **Active Bribery**

Where an Employee offers, promises or gives a Benefit or other advantage.

### **Benefit**

A gift, benefit, entertainment and/or hospitality.

### **Bribery**

The offering, promising, giving, accepting or soliciting of an advantage as an inducement for an action which is illegal, unethical or a breach of trust. Common forms of Bribery include:

- Gifts and entertainment;
- Hospitality;
- Political donations;
- Employing relatives (nepotism); and
- Payments in cash.

### **Corruption**

A dishonest activity in which an employee of an entity acts contrary to the interests of the entity and abuses their position of trust in order to achieve some personal gain or advantage for themselves or for another person or entity. Examples of Corruption include extortion and embezzlement.

### **Employee**

Includes all individuals employed by Gold Corporation including directors, contractors, independent agents, approved dealers and other relevant parties acting on behalf of Gold Corporation. It shall be communicated to third parties at the outset of our business relationship and/or as appropriate thereafter.

### **Facilitation Payment**

A payment to a foreign official, political party or party official for "routine government action", such as processing papers, issuing permits and other actions of an official, in order to expedite non-discretionary duties (duties the official is already bound to perform). The payment is not intended to influence the outcome of the official's action, only its timing.

### **Passive Bribery**

Where an Employee requests, agrees to receive or accepts a Benefit or other advantage.