

Anti Bribery, Fraud and Corruption Policy

Date	Changed	Approved
2 February 2016	Original adoption	Board
19 February 2020	Update	Board
18 February 2022	Reviewed	Board
14 February 2025	Update	Board

Anti Bribery, Fraud and Corruption Policy

Hillgrove Resources is committed to conducting business with integrity, transparency, and accountability and prohibits any form of bribery, fraud, and corruption in its operations and business dealings. This policy applies to all employees, directors, officers, contractors, suppliers, consultants, and any third parties acting on behalf of Hillgrove Resources in Australia and internationally.

OUR KEY PRINCIPLES AND COMMITMENTS REGARDING ANTI-BRIBERY, FRAUD AND CORRUPTION INCLUDE

- ▶ Maintaining zero tolerance for bribery, fraud, and corruption
- ▶ Prohibiting the giving or receiving of gifts or money or favours which could be considered to give rise to undue influence
- ▶ Encouraging employees, contractors, and other third parties to report, whether suspected, or actual, bribery, fraud and corruption issues through our Whistleblower Policy and program
- ▶ Providing protection for those who choose to report on potential matters arising, and zero tolerance for acts of retaliation
- ▶ Reporting any suspected or actual breaches of materiality to the relevant authorities
- ▶ Undertaking investigations into any material matters
- ▶ Compliance with all relevant Australian and international laws
- ▶ Implementation of adequate procedures to prevent domestic and foreign bribery
- ▶ Conducting bribery risk assessments and review the adequacy of systems and the levels of compliance
- ▶ Providing a risk-based system to assess business partners, customers, suppliers, and contractors through due diligence assessments prior to transacting business agreements
- ▶ Providing, and mandating, anti-bribery, fraud and corruption training for employees and relevant business partners

EMPLOYEE COMMITMENTS

- ▶ Employees are not to receive any personal favours or financial benefits to themselves or family members that may conflict with their duties and responsibilities to Hillgrove Resources
- ▶ Any benefit or favour, which may constitute a conflict of interest, shall be reported expediently to the employee's direct manager or an appropriate senior manager
- ▶ Employees must not offer, promise, give, demand or accept any undue advantage, whether directly or indirectly, to or from another party to secure any other improper advantage in the conduct of business

The implementation and monitoring of this policy will be overseen by the Hillgrove Board.

R (Bob) Fulker

Managing Director and CEO – Hillgrove Resources