

ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

1 OVERVIEW

- (a) Hawsons Iron Ltd ACN 095 117 981 (**Company**) is a public company admitted to the official list of the Australian Securities Exchange (**ASX**).
- (b) The board of directors (**Board**) of the Company has developed this anti-bribery and anti-corruption policy (**Policy**) to ensure compliance with its statutory and regulatory compliance.
- (c) The Board acknowledges the serious criminal and civil penalties that may be incurred by the Company or individuals who are found to have engaged in bribery or corruption which can result in the reputational damage of the Company or any individuals involved.

2 PURPOSE AND VALUES

2.1 Purpose

The purpose of this Policy is to provide the Board, senior management, all employees and contractors of the Company with a clear set of guidelines to ensure that the Company conducts its activities in an ethical and appropriate manner as well as complying with the laws and regulations of Australia and each jurisdiction in which it operates and its Statement of Values.

2.2 Statement of Values

In implementing this Policy, the Company will have regard to its Statement of Values.

The Company's vision is to create opportunities that enhance living standards and deliver sustainable benefits in a responsible, safe, and efficient manner.

3 OBJECTIVES

The specific objectives of this Policy are to ensure that the Company:

- (a) does not engage in corrupt business practices;
- (b) will implement procedures to prevent bribery and corruption involving any director, officer, employee, contractor or other party representing the Company;
- (c) will, at a minimum, comply with all applicable laws, regulations and standards, including applicable Anti-Bribery Laws in Australia and each jurisdiction it operates in; and
- (d) where anti-bribery or anti-corruption legislation policies may be lacking or require a higher standard, the Company will comply with higher standards by referring to this Policy's provisions.

4 PRINCIPLES

- (a) The Company prohibits activities involving bribery, corruption, payment of secret commissions, facilitation payments or the exercise of improper influence in all jurisdictions in which the Company operates. This Policy applies to dealings with both government officials and any other third parties.
- (b) Gifts and entertainment, political contributions, charitable contributions, social investment, offers of employment and sponsored travel have the potential to be misused as a disguise for bribes for the purpose of influencing decisions or obtaining an

advantage. In some circumstances it may be difficult to determine the true nature of these types of payments.

- (c) Accordingly, the Company has adopted this Policy to ensure openness and transparency in dealings with these payments. Any questions or issues regarding this Policy, should be directed to the Chair or the Company Secretary in the first instance.

5 APPLICATION

This Policy applies to all executive and non-executive directors, officers, employees, contractors, consultants, volunteers (**Employees**) of the Company in Australia.

6 WHAT IS BRIBERY AND CORRUPTION

- (a) Bribery is the giving, offering, promising soliciting, requesting, agreeing to receive, or receipt or acceptance of any advantage, which need not be financial, including any payment, gift, loan, fee, or reward, to or from any person for an inducement for action which is illegal, unethical, or a breach of trust.
- (b) Corruption is the misuse or abuse of a power for personal gain. This includes but is not limited to, money laundering, embezzlement or corruption of justice.

7 CORRUPT PAYMENTS PROHIBITED

All Company personnel are prohibited from making or accepting any corrupt payments. Without limitation, the Company specifically prohibits:

- (a) the promise, offering, payment, solicitation or acceptance of bribes in any form, including the offer or promise of employment or sponsorship;
- (b) engagement in any form of corrupt business practices, whether for the benefit of the Company, the individual or another party; and
- (c) facilitation payments, even if they may appear to be permitted under Australian law.

Requests from government officials or other third parties to make or accept any form of corrupt payment must be immediately reported to the Chair or the Company Secretary or otherwise in accordance with the Company's Whistleblower Policy.

8 GIFTS AND ENTERTAINMENT

The offer, promise, giving or receiving of any gift or entertainment to or from government officials or other third parties has the potential to be construed, or used by others to allege, that the Company is trying to obtain or receive favourable business treatment by providing individuals with personal benefits.

However, the giving or receiving of gifts or hospitality is not always prohibited by applicable anti-bribery laws or this Policy. The gift or hospitality may be appropriate if it is for a genuine purpose, reasonable and provided as a common courtesy associated with the ordinary course of business, and not made with any intentions to influence or reward a third party for obtaining or retaining business or an exchange of favours.

The Company has adopted the following general guidelines for determining the appropriateness of gifts and entertainment to or from government officials and other third parties:

- (a) All employees should discuss with the Chair or the Company Secretary the fact that they have been offered a gift/benefit before accepting it to determine the appropriate course of action.
- (b) There must be no expectation that the gift or entertainment is given in exchange for any return favour, commitment or advantage.



- (c) The gift must not be made in cash or cash equivalents and must otherwise comply with the Code of Conduct and applicable laws.
- (d) The gift or entertainment must be infrequent, reasonable and proportionate in value considering the local custom and law, position of the recipient and circumstances.
- (e) The timing of the gifting or entertainment must have been considered objectively in respect of past, pending or future business activities to ensure it could not be perceived as a bribe.
- (f) The gift must be given openly and in the name of a commercial entity, not in someone's personal name.
- (g) Gifts or benefits worth \$300 or more must be declared and recorded in the gift and entertainment register.
- (h) Gifts or benefits worth \$500 or more must be declined unless an exception applies.

Exceptions include:

- (i) invitations to speak at a professional association (including flights and accommodation);
 - (ii) working lunches; and
 - (iii) if the Chair provides approval and the gift or benefit is disclosed in the register.
- (i) Declarations on receiving gifts must be done within 5 working days of receiving or being offered the gift or benefit.

All giving or receiving of gifts or entertainment to government officials and other third parties must comply with the above guidelines and require the prior approval of the Chair.

Personally paying for a gift, entertainment or other provision of value in order to avoid compliance with the requirements of this Policy is prohibited.

9 DEALINGS WITH GOVERNMENT OFFICIALS

For the purpose of this Policy, a Government Official is defined as any of the following:

- (a) official or employee of any government, or any agency, ministry or department of a government (at any level);
- (b) any person acting in an official capacity for a government regardless of rank or position;
- (c) official or employee of a company wholly or partially controlled by a government (for example, a state-owned oil company), but excluding employees seconded to such companies;
- (d) a political party or any official of a political party;
- (e) candidate for political office;
- (f) officer or employee of a public international organisation, such as the United Nations or the World Bank; or
- (g) immediate family member (meaning a spouse, dependent child, parent or household member) of any of the above.

The Company requires the exercise of a high degree of caution when dealing with government officials. The provision of anything of value, no matter how small, has the potential to create the perception that the Company has sought to improperly influence the Government Official to obtain an advantage. For this reason, the Company has implemented specific procedures when dealing with government officials.



9.2 Gifts and entertainment

Before offering or accepting any gift, meal or entertainment, regardless of value or nature of the gift or entertainment, approval from the Chair is required.

Additionally, any gifts or entertainment given to or received from a Government Official must be recorded in the Government Official's register of gifts and entertainment.

9.3 Donations

The Company does not make donations to any political party, politician or candidate for public office in any jurisdiction. Caution should be exercised when donating to private charities favoured by government officials, as such donation could be conceived as a bribe.

The Company will only make charitable donations that are legal and ethical under local laws and practices. Charitable donations will only be made to organisations that have a deductible gift recipient status with the Australian Taxation Office and with prior approval of the Chair or the Company Secretary.

9.4 Sponsored travel

Generally, the payment of travel and travel related expenses for government officials is prohibited. In certain circumstances the Chair, CEO or the Company Secretary retains the discretion to approve the payment of travel and travel related expenses of government officials where:

- (a) the payment is for reasonable, customary and bona fide expenditure incurred strictly in relation to travel and travel related activities;
- (b) the payment is made directly to the vendor(s) of the travel services or, only to the extent such direct payment is not possible, reimbursed to the public official only upon submission of valid receipts; and
- (c) the travel is directly related to the promotion, demonstration or explanation of the Company's business activities or facilities.

9.5 Offers of employment or sponsorship

Before any offer of employment or sponsorship is made to or on behalf of a Government Official, approval from the Board is required.

10 RECORD KEEPING AND REPORTING REQUIREMENTS

- (a) The Company and its subsidiaries must keep financial records and have appropriate internal controls in place which evidence the business reasons for making a payment or contribution to a third party.
- (b) All gifts, entertainment and payments to and from government officials and other third parties that require approval by the Chair or the Company Secretary must be recorded and maintained in an accurate and auditable register. The Company Secretary has responsibility for this register. Records that distort or disguise the true nature of any transaction are prohibited.
- (c) Each individual to whom this Policy applies must fully disclose all details regarding any and all such gifts, entertainment and payments they have made or approved or have received directly to the Company Secretary and provide all relevant documentary support including a valid tax invoice for such items.

11 PROTECTION

The Company will take all reasonable steps to protect the confidentiality of employees who, in good faith, raise concerns or report about potential bribery or corruption by another employee of the Company.



This protection is applicable even if the concern turns out to be a mistake.

12 CONTRAVENTION AND PENALTIES

- (a) Any breach of Policy is to be reported to the Chair or the Company Secretary.
- (b) Most countries have specific laws prohibiting bribery of government officials and other corrupt practices. Any breach of this Policy or local law could result in potentially serious consequences, including but not limited to termination of employment or contract by the Company, and fines and/or imprisonment under applicable laws.

13 COMMUNICATION

This Policy will be communicated and promoted at all levels of the Company's business and disclosed on the Company's website for reference by external stakeholders.

14 REVIEW OF POLICY

The Board will review this Policy at least biennially to ensure it is operating effectively.

Approved by the Board

Date: 26 November 2024

