ZEUS RESOURCES LIMITED
ACN 139 183 190
(Company)

Board approved 5 May 2025

SCHEDULE 12 – ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

1. Background

The Company is committed to conducting all of its business activities fairly, honestly with integrity, and in compliance with all applicable laws, rules and regulations. Its Board, management and employees are dedicated to high ethical standards and recognise and support the Company's commitment to compliance with these standards.

In particular, the Company is committed to preventing any form of Corruption and Bribery and to upholding all laws relevant to these issues, including the Anti-Corruption Legislation. In order to support this commitment, the Company has adopted this Anti-Bribery and Anti-Corruption Policy (**ABC Policy**) to ensure that it has effective procedures in place to prevent Corruption and Bribery.

This ABC Policy applies globally. To the extent that local laws, codes of conduct or other regulations (**Local Laws**) in any countries are more rigorous or restrictive than this ABC Policy, those Local Laws should be followed by any subsidiary operating in that country. Where a country has specific bribery and corruption Local Laws which are less rigorous than this ABC Policy, this ABC Policy prevails. The Company may, from time to time, provide country-specific directions for subsidiaries operating in countries outside of Australia.

This ABC Policy sets out the Company's requirements in relation to interactions with Officials and Third Parties. This ABC Policy does not prohibit interactions with Officials, rather it forbids corrupt interactions with those individuals.

In this ABC Policy, references to the Company includes references to the Company and all of its subsidiaries.

2. Definitions

In this ABC Policy the following words or phrases mean the following:

Anti-Corruption Legislation includes many laws such as the *Criminal Code Act 1995 (Cth)* and any applicable anti-corruption laws and regulations applicable to the location in which the Company operates.

Bribery is the act of offering, promising, giving or accepting a benefit with the intention of influencing a person who is otherwise expected to act in good faith or in an impartial manner, to do or omit to do anything in the performance of their role or function, in order to provide the Company with business or a business advantage that is not legitimately due (whether in respect of an interaction with an Official or any commercial transaction in the private sector).

Business Associates means third party companies and individuals (such as joint venture partners, consultants and agents) acting on the Company's behalf, whether directly or indirectly, by representing the Company's interests to foreign governments in relation to international business development or retention of business opportunities.

Corruption is the abuse of entrusted power for private gain.

Facilitation Payment means payments of nominal amounts or other inducement made to persons in order to secure or expedite the performance of a Government Official's routine governmental duties or actions.

Gifts, Entertainment and Hospitality includes the receipt or offer of presents, meals or tokens of appreciation and gratitude or invitations to events, functions, or other social gatherings, in connection with matters related to the Company's business unless they:

(a) fall within reasonable bounds of value and occurrence;

(b) do not influence, or are not perceived to influence, objective business judgement; and

(c) are not prohibited or limited by applicable laws or applicable industry codes.

Government Official means:

(a) any politician, political party, party official or candidate of political office; (b)

any official or employee of a domestic or foreign government (whether national, state/provincial or local) or agency, department or instrumentality of any domestic or foreign government or any government-owned or controlled entity (including state-owned enterprises);

(c) any official or employee of any public international organisation;

(d) any person acting in a private or public official function or capacity for such domestic or foreign government, agency, instrumentality, entity or organisation;

(e) any person who holds or performs the duties of any appointment created by custom or convention or who otherwise acts in an official capacity (including, some indigenous or tribal leaders who are authorised and empowered to act on behalf of the relevant group of indigenous peoples and members of royal families);

(f) any person who holds themselves out to be an authorised intermediary of a government official.

Item of Value includes, amongst other things, cash, travel, meals, Gifts, Entertainment and Hospitality, other tangible or intangible benefits or anything of value.

Money-laundering means the process by which a person or entity conceals the existence of an illegal source of income and then disguises that income to make it appear legitimate.

Official means a Government Official, political party, official or officer of a political party or candidate for political office.

Personnel means all persons acting (whether authorised or unauthorised) on behalf of the Company at all levels, including officers, directors, temporary staff, contractors, consultants and employees of the Company.

Secret Commissions means offering or giving a commission to an agent or representative of another person that is not disclosed by that agent or representative to their principal to induce or influence the conduct of the principal's business.

Secure an improper advantage includes obtaining any commercial or financial benefit.

Third Party means any individual or organisation other than Officials, with whom Personnel come into contact during the course of their employment or business relationships associated with the Company.

3. Purpose

The purpose of this ABC Policy is to:

(a) set out the responsibilities of the Company and its management and Personnel in upholding the Company's commitment to preventing any form of Bribery or Corruption; and

(b) provide information and guidance to Personnel on how to recognise and deal with any potential Bribery and Corruption issues.

4. Scope and authority

The Company requires all Personnel to comply with this ABC Policy as well as the Anti- Corruption Legislation. The prevention, detection and reporting of Bribery and other forms of Corruption are the responsibility of all those working for the Company or under its control.

This ABC Policy applies to all Personnel, including directors, temporary staff and contractors, and Business Associates of the Company. This Policy supplements, and does not replace, the Code of Conduct applicable to the Company and any of its subsidiaries.

5. Responsibility for policy compliance and training

(a) The Company's Board is responsible for the overall administration of this ABC Policy. The Board and the Anti-Bribery Officer will monitor the implementation of this ABC Policy and will review on an ongoing basis the ABC Policy's suitability and effectiveness. Internal control systems and procedures will be audited regularly to ensure that they are effective in minimising the risk of non-compliance with this ABC Policy.

(b) A copy of this ABC Policy will be made available to all and in such other ways as will ensure the ABC Policy is available to Personnel wishing to use it.

(c) All Personnel are required to understand and comply with this ABC Policy and to follow the reporting requirements set out in this ABC Policy. To this end, regular and appropriate training on how to comply with this ABC Policy will be provided to all senior managers and other relevant Personnel by the Board and the Anti-Bribery Officer for each business. However, it is the responsibility of all Personnel to ensure that they read, understand and comply with this ABC Policy.

(d) All Business Associates are required to be made aware of this ABC Policy and to undertake to comply with this ABC Policy in relation to any of their dealings with, for or on behalf of the Company.

(e) The prevention, detection and reporting of Bribery and other improper conduct addressed by this ABC Policy are the responsibility of all those working for or engaged by the Company. All Personnel should be vigilant and immediately report any breaches or suspicious activity to the officer responsible for compliance.

6. Consequences of breaching this ABC policy

(a) Bribery and the related improper conduct addressed by this ABC Policy are very serious offences that will be taken seriously, reviewed and thoroughly investigated by the Company. Depending on the circumstances, the incident may be referred to regulatory and law enforcement agencies.

(b) A breach of this ABC Policy may also expose Personnel and the Company to criminal and/or civil penalties, substantial fines, exclusion from tendering for government or private contracts, loss of business and reputational damage.

(c) Breach of this ABC Policy by Personnel will be regarded as serious misconduct, leading to disciplinary action which may include termination of employment.

7. Policy

7.1 General

(a) Personnel must:

(i) understand and comply with this ABC Policy and attend all relevant training;

(ii) not engage in Bribery or any other form of Corruption or improper conduct;

(iii) not make Facilitation Payments;

(iv) not offer, pay, solicit or accept Secret Commissions;

(v) not engage in Money-laundering;

(vi) not give or accept Items of Value where to do so might influence, or be perceived to influence, objective business judgement or otherwise be perceived as improper in the circumstances.

(vii) obtain required approvals for political contributions and charitable donations;

(viii) maintain accurate records of dealings with Third Parties; and

(ix) be vigilant and report any breaches of, or suspicious behavior related to, this ABC Policy.

(b) This ABC Policy does not prohibit the giving of normal and appropriate hospitality to, or receiving it from, Third Parties.

7.2 Prohibition against Bribery and Corruption

(a) The Company strictly prohibits Personnel engaging in or tolerating Bribery or any other form of Corruption or improper conduct.

(b) The Company's corporate values require that in all aspects of business all Personnel act honestly, adhere to the highest ethical standards, and act in compliance with all relevant legal requirements. In this respect Personnel must not engage in Bribery or any other form of Corruption.

(c) The prohibition of Bribery under this ABC Policy includes the provision or conveying of an Item of Value to any Third Party, Official or family members of Officials, whether directly or indirectly, to secure any improper advantage or to obtain or retain business. This means that Personnel must not:

(i) offer, promise or give an Item of Value with the intention of influencing an Official or Third Party who is otherwise expected to act in good faith or in an impartial manner, to do or omit to do anything in the performance of their role or function, in order to provide the Company with business or an improper advantage; or

(ii) authorise the payment or provision of Items of Value to any other person, if it is known, or reasonably should have been known, that any portion of that payment or Item of Value will be passed onto an Official or Third Party to secure an improper advantage or obtain or retain business; or

(iii) engage, or procure, a third party to make a payment or provide an Item of Value to an Official or Third Party, (or to procure another person to make such payment or provision), in order to secure an improper advantage or obtain or retain business.

(d) The prohibition of Bribery under this ABC Policy also includes the request or acceptance of (or the agreement to accept) an Item of Value from an Official or Third Party either:

(i) intending that, in consequence, a function or activity should be performed improperly (whether by the requestor/acceptor or another person); or

(ii) where the request, agreement or acceptance itself constitutes the recipient's improper performance of a function or activity; or

(iii) as a reward for the improper performance of a function or activity (whether by the recipient or another person).

7.3 Prohibition on Facilitation Payments, Secret Commissions and Money-laundering

(a) The Company does not condone the making of Facilitation Payments, Secret Commissions and Money Laundering.

(b) Personnel are prohibited from:

(i) making Facilitation Payments;

(ii) offering, paying, soliciting or receiving Secret Commissions; and

(iii) engaging in Money-laundering.

7.4 Political Contributions and Charitable Donations

(a) **Political Contributions**

The Company prohibits Personnel from making political contributions to Officials on behalf of the Company. Any donations above a level determined in Federal legislation must be disclosed annually to the Australian Electoral Commission and will be published on its website.

This ABC Policy does not seek to curtail an individual's freedom to make political contributions in their personal capacity.

The context of any other political contributions is key in determining their appropriateness. For instance, it is permissible for the Company to make a payment to attend a political function in circumstances where such payment could not be construed as an attempt to influence the political party.

If you are in any doubt as to the appropriateness of any political contribution, you should consult the Board or the Anti-Bribery Officer before it is given or accepted or otherwise as soon as possible.

(b) **Charitable Donations**

The Company can only make charitable donations that are legal and ethical under Local Laws and practices. In order to ensure that donations made by the Company to charitable organisations are for proper charitable purposes, Personnel must only make donations on behalf of the Company to charitable organisations previously approved by the Company and within approved financial limits.

A list of approved charitable organisations is to be maintained by the Board and provided upon request.

7.5 Interactions with Officials and Third Parties must be Compliant

All interactions with Officials, Third Parties and Business Associates must comply with this ABC Policy, and the Company and Personnel must not take any actions, whether direct or indirect, which create the appearance of impropriety regardless of whether there is any improper intent behind their actions.

The prohibitions under this ABC Policy include a prohibition on Personnel using personal funds to undertake any interaction or transaction that is prohibited under this ABC Policy.

All payments made to a Third Party must be reasonable in relation to the products sold to, or bona fide services rendered by, the Third Party to or on behalf of the Company. Payments to a Third Party should never be made in cash and should be made to the Third Party's bank account in the country where the services are performed or where the Third Party's offices are located. No payments shall be made to a Third Party without detailed invoices that fully and accurately describe the services and expenses incurred.

(a) **Due Diligence**

(i) Due diligence must be performed to ensure that a Third Party is a bona fide and legitimate entity, is qualified for the purpose of its engagement, and maintains standards consistent with the ethical and reputational standards of the Company.

(ii) Due diligence on Third Parties also minimizes the risk of payments being used to facilitate money laundering or terrorist financing without the Company's knowledge.

(iii) The Company recognizes that corruption risks can vary by location, type of transaction and customer, and, accordingly, this ANC Policy requires enhanced diligence procedures for engaging with Third Parties in circumstances that present a higher perceived risk of corruption:

(A) Basic Due Diligence is required for screening all potential Third Parties;

(B) Enhanced Due Diligence is required for all potential Third Parties who may be involved in sales, business development, regulatory approvals or other capacity in the following regions, even if Basic Due Diligence does not identify any "red flags" or issues of concern**: Russia, the Commonwealth of Independent States, Eastern Europe, the Middle East (excluding Israel), Central and South America, China, Southeast Asia and Africa**;

(C) Enhanced Due Diligence is required for all potential Third Parties who may deal with Officials on behalf of the Company; and

(D) Enhanced Due Diligence is required if any issues of concern or "red flags" are identified in the Basic Due Diligence. Inability or difficulty to verify the corporate history of an entity or the background and expertise of an individual should be considered a "red flag" that requires Enhanced Due Diligence. Negative reports in the media or in the local business community are also "red flags" requiring Enhanced Due Diligence. Appendix 1 contains a list of red flags. You should discuss any "red flags" concerning a particular potential Third Party with the Company Secretary.

(E) Appendix 2 to this ABC Policy provides a flow chart to aid Personnel in conducting these due diligence procedures[2].

(b) **Basic Due Diligence Steps**

The required Basic Due Diligence includes:

(i) completion of a credit application form (if applicable);

(ii) verification of the corporate registration of the entity, or the expertise of a person, the business address, corporate history, corporate structure and beneficial ownership, directorships, etc.; and

(iii) media search to identify any negative publicity (i.e., conducting reasonable key word searches using public Internet search engines).

Information regarding items (ii) and (iii) generally can be confirmed through a third-party credit report and desktop media searches. Information identified during the background screening will be reviewed by the Company Secretary and should be maintained in a due diligence file regarding the potential customer representative, Business Associate or other Third Party.

(c) **Enhanced Due Diligence Steps**

The following steps should be taken in connection with Enhanced Due Diligence of a potential Third Party:

(i) **External research and verification of the Third Party's experience and expertise.** Publicly available information regarding the potential Third Party should be verified through independent sources. Appendix 3 to this ABC Policy identifies sources that should be considered in conducting background checks of potential Third Parties, and lists factors demonstrating relevant experience and expertise that should be used in evaluating potential Third Parties. A copy of all research and background checks should be maintained in the due diligence file regarding the potential Third Party.

(ii) **Completion of a Due Diligence Questionnaire**. In most cases, it will be appropriate to have the prospective Third Party submit responses to the Due Diligence Questionnaire, attached to this ABC Policy as Appendix 4. The Due Diligence Questionnaire should be supplemented with additional questions depending on the particular facts and circumstances. A copy of the completed Due Diligence Questionnaire should be maintained in the due diligence file regarding the potential Third Party

In addition to the foregoing, in person meetings are a useful means of verifying business qualifications, experience and expertise of Third Parties.

[2] Appendix 2 serves only as a guide and does not reflect all facts and circumstances that may arise in the course of due diligence. Personnel should contact the Company Secretary with any questions or for additional guidance.

Where an in-person meeting or meetings has occurred, the Personnel involved in such meeting(s) should document, in the form of written notes or a brief memorandum, the date(s) of the meeting(s), location(s), participants and the discussion that took place. Such documentation should then be provided to the Company Secretary for review and should ultimately be maintained in the due diligence file regarding the potential Third Party.

7.6 Documentation and Recordkeeping

(a) As part of the Company's commitment to open and honest business practice the Company requires all of its businesses to maintain accurate books of account and records.

(b) The Company and its subsidiaries must keep accurate and complete records of all business transactions:

(i) in accordance with generally accepted accounting principles and practices;

(ii) in accordance with the Company's accounting and finance policies; and

(iii) in a manner that reasonably reflects the underlying transactions and events.

(c) It is the responsibility of all Personnel to ensure that all business transactions are recorded honestly and accurately and that any errors or falsification of documents are promptly reported to the appropriate member of the senior management team of the relevant business, and corrected. No accounts are to be kept "off the books" to facilitate or conceal improper payments.

(d) All Personnel must record Items of Value given or received in the Items of Value Register set out in Appendix 5.

7.7 Compliance with Local Laws Required

If Local Laws in a particular country or region are more restrictive than this ABC Policy, then any Personnel, including any Business Associates operating in that country or region must fully comply with the more restrictive requirements.

7.8 Reporting Violations and Suspected Misconduct

(a) Any Personnel or stakeholder who believes that a violation of this ABC Policy or any laws has been committed, is being committed, or is being planned, should report the matter immediately to the Board or the Anti-Bribery Officer.

(b) If anyone is unsure whether a particular act constitutes Bribery, a Facilitation Payment, Secret Commission, Money-laundering or an improper Item of Value, or has any other queries, they should ask the Board or the Anti-Bribery Officer.

7.9 Protection

(a) The Company prohibits retaliation against anyone reporting such suspicions.

(b) Personnel who wish to raise a concern or report another's wrongdoing, or who have refused pressure to either accept or offer a bribe, should not be worried about possible repercussions. The Company encourages openness and will support any Personnel who raises genuine concerns in good faith under this ABC Policy.

(c) If you are not comfortable, for any reason, with speaking directly to the Board or the Anti-Bribery Officer, the Company has a Whistleblower Protection Policy which affords certain protections against reprisal, harassment or demotion for making the report.

8. Monitoring and Review

(a) Material breaches of this ABC Policy will be reported to the Board or a committee of the Board.

(b) The Board and the Anti-Bribery Officer will monitor the content, effectiveness and implementation of this ABC Policy on a regular basis. There may also be independent reviews taken from time to time. Any findings, updates or improvements identified will be addressed as soon as possible.

(c) Personnel are invited to comment on this ABC Policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to the Board or the Anti-Bribery Officer.

APPENDIX 1 – RED FLAGS

All Personnel should be aware of "red flags" that may indicate questionable transactions that expose the Company to legal, financial, or reputational harm. "Red flags" include, without limitation:

1. Unusual payments or financial arrangements such as:

   (a) Payments to a bank account without the disclosure of the person's or organisation's name associated with the account, and/or to a bank account in a different name than the person or organisation entitled to payment from the Company;

   (b) Payments to accounts in countries other than where the agent is located or business is to be performed; or

   (c) Cash or non-cash in-kind payments.

2. Unusually high commissions in net value or in comparison to the value of the contract achieved.

3. Unusual or excessive gift, entertainment, meal or travel expenses.

4. History of corruption in the country.

5. The person or organisation has a reputation for paying bribes, or requiring that bribes are paid to, or has a reputation for having a "special relationship" with, Officials.

6. The person or organisation insists on the use of side letters or refuses to put the agreed terms in a written document.

7. The person or organisation insists on receiving a commission or fee before committing to sign a contract with the Company or carrying out a government function or process for the Company.

8. Use of a person or organisation for the purpose of avoiding knowledge of how interactions with Officials occur or how problems are resolved.

9. Refusal by a person or organisation to certify or agree to contract language that they will not take action that would violate the applicable anti-corruption laws and regulations.

10. "Recommendations" of a person or organisation that come from an Official.

11. Complex group structures without obvious explanation.

APPENDIX 2 – DUE DILIGENCE FLOW CHART

Basic Due Diligence

(Required for all potential customer representatives, potential Business Associates and other Third Parties)

1. Complete the Company's Credit Application Form (if applicable)
2. Verify the corporate registration of the entity, or the expertise of a person, the business address, corporate history, corporate structure and beneficial ownership, directorships, etc., using a third party credit report or equivalent.
3. Conduct a media search to identify any negative publicity (i.e., conduct reasonable keyword searches using public Internet search engines).
4. Submit information gathered from steps 1-3 to the Company Secretary

Will the potential customer representative, potential Business Associate or other Third Party be involved in sales, business development, regulatory approvals or other capacity in **Russia, the Commonwealth of Independent States, Eastern Europe, the Middle East (excluding Israel), Central and South America, China, Southeast Asia and Africa.**

Yes

Notify the accounting department and/or Company Secretary that Enhanced Due Diligence is required.

ENHANCED DUE DILIGENCE

Work with the Company Secretary to:

1. Conduct external research and verification of experience and expertise. *See* Appendix 3.
2. Complete a Due Diligence Questionnaire. *See* Appendix 4.
3. Take other action as necessary, which may include documenting in-person meetings.

No

Were any "red flags" or issues of concern identified?

For example:

- The potential customer representative, potential Business Associate or other Third Party will deal with Officials on behalf of the Company
- Inability or difficulty verifying corporate history or background and expertise
- Negative media reports
- Unusual or excessive payment requests (i.e., requests for over invoicing, up-front payments, unusual commissions or midstream compensation payments)
- Requests for payments in a different country, to a third party, to a bank account outside of the country of operation, or in cash or other untraceable funds
- Refusal or hesitancy to promise in writing to abide by the Company's Policies and governing law
- Charges for violation of local or foreign laws or regulations concerning the award of government or other contracts
- A close relationship with an Official or commercial counterparty
- A demand or strong suggestion by an Official or commercial counterparty to retain the entity/individual
- A desire to keep representation of the Company or the terms of the retention secret.

Yes

Discuss red flags and issues of concern with the accounting department and/or Company Secretary and notify them that Enhanced Due Diligence

No

Notify the Company Secretary that there were no red flags or issues of concern identified.

APPENDIX 3– BACKGROUND INVESTIGATION CHECKLIST

Resources for external verification of a customer representative's, Business Associate's or other Third Party's reputation, experience and qualifications could include:

(a) A report on candidate's character and reputation by those employees who have met him or her

(b) A report on candidate's character and reputation based on outside sources:

— Third party business intelligence providers

— U.S. State Department country desk or similar source

— U.S. Commerce Department country or business desk or similar source

— Commercial Attaché at U.S. Embassy in local country or similar source

— Commercial office of the foreign embassy in the United States or similar source

— Chamber of Commerce office

(c) Bank References

(d) Screening against databases of politically exposed person and "watch lists" for sanctioned persons, for example:

— U.S. Department of State List of Statutorily Debarred Parties: http://www.pmddtc.state.gov/compliance/debar.html or similar source

— U.S. Office of Foreign Assets Control Specially Designated Nationals List: http://www.treas.gov/offices/enforcement/ofac/sdn or similar source

(e) A report on family or business ties to Officials

(f) A report on prior government service

(g) Verification that candidate has experience in the area for which he or she is being hired

(h) Assessment of reasonableness and comparability of proposed compensation or profit arrangement

(i) Opinion of local counsel on possible issues of local law

Evidence of customer representative, Business Associate or other Third Party Experience and Expertise

Factors that indicate relevant experience and expertise that should be used in evaluating potential customer representatives, Business Associates or other Third Parties include:

(j) A good reputation for ethical behaviour, business competence, and reliability

(k) Financial stability (i.e. adequate resources necessary to accomplish the objectives of the agreement)

(l) Knowledge of applicable legal procedures and laws

(m) Adequate facilities for providing service and, as necessary, goods

(n) The ability to keep pace with expanding business opportunities

(o) Good access to information within the industry and financial sectors

(p) An established presence in the local business community

APPENDIX 4 – DUE DILIGENCE QUESTIONNAIRE

[to be completed by potential customer representative, potential Business Associate or other Third Party]

1. Company Name _____

2. Previous Names (if any) _____

3. Country Where Work Will Be Performed

4. Address _____
_____ Telephone
_____ Fax
_____
_____

5. Entity type and jurisdiction (e.g., limited liability company, partnership, etc.)

_____
_____

6. Date & Place of Incorporation
_____

7. Management Information:
Chairman/President
_____
Managing Director
_____
Sales Director
_____

8. Ultimate beneficial Owners/Principals:
_____
Name % Ownership _____
Name % Ownership _____
Name % Ownership
Name % Ownership
_____

9. Members of the Board of Directors:
Name
_____
Name
_____

Name

Name

10. Parent Company(ies) Subsidiary

Companies Jointly Owned

Companies

11. Business References: (a)

(b) (c)

12. Banking/Credit References: (a)

(b) (c)

13. Percentage of your time which will be devoted to the Company business: %

14. Historical Background:

(a) Years company has been in business

(b) How long have you been involved in the business of

?

(c) Briefly describe the establishment of your business, the primary areas of business activity, changes in ownership, changes in areas of concentration, growth plans, potential new markets, etc.

15. Briefly describe the experience and qualifications of the management personnel of your business and how this relates to this position.

_____

16. Please attach financial statements (audited, if available) for the past three (3) years, including balance sheets and profit and loss statements.

17. Please use this space to provide any additional information which you feel may be relevant to your qualifications for the position:

_____

_____

_____

18. (a) (i) Does any current or former government official, political party official, candidate for political office, or relative of such a person, have an ownership interest, direct or indirect, in your company?

Yes _____No _____

(ii) Is any former or current government official, political party official, candidate for political office, or relative of such a person, an employee, officer or director of your company?

Yes _____No _____

(b) If the answer to either (a)(i) or (a)(ii) above is yes, please state:

(i) The name and official position of the government or political party official or candidate:

_____

(ii) The official duties and responsibilities of the government or political party official or duties related to the office for which such person is a candidate:

_____

(iii) Indicate the type and extent of the ownership interest in your company of the government or political party official or candidate:

_____

(iv) Indicate the position of the government or political party official or candidate, or the relative of such person, with your company:

_____

(v) If the government or political party official or candidate in question is a relative of an owner, employee, officer or director of your company, state the relationship of that official to your owner, employee, officer or director:

_____

_____ _____

Signature Date

_____

Typed name and title

_____

Company

APPENDIX 5 – ITEMS OF VALUE REGISTER

1. Definitions

Gifts, Entertainment and Hospitality includes the receipt or offer of presents, meals or tokens of appreciation and gratitude or invitations to events, functions, or other social gatherings, in connection with matters related to the Company's business unless they:

(a) fall within reasonable bounds of value and occurrence;

(b) do not influence, or are not perceived to influence, objective business judgement; and

(c) are not prohibited or limited by applicable laws or applicable industry codes.

Item of Value includes, amongst other things, cash, travel, meals, Gifts, Entertainment and Hospitality and other tangible or intangible benefits or anything of value.

2. Completing the Items of Value Register

The following information is required in completing the Items of Value Register:

Receiving Items of Value
Date Received
Name, Position & Business Unit of Recipient
Name of Giver (Who is giving you the gift / entertainment)
Description of gift / entertainment
Value $
Reason for acceptance
Decision on what will happen to gift / entertainment
Name and Position of Approving Manager (e.g. GM)

Offering Items of Value
Date Offered
Name, Position & Business Unit of Offeror
Name of Receiver (Who are you offering the gift / entertainment too)
Description of gift / entertainment
Value $
Reason for offering
Decision on what will happen to gift / entertainment
Name and Position of Approving Manager (e.g. GM)