

Anti-Bribery and Corruption Policy

KRAFTIGS Australia Pty Ltd · ACN 650 985 121 · ABN 21 650 985 121

Version 1.0 · Adopted June 2026

Policy owner	Chief Executive Officer (Ali Hammoud)
Approved by	Board of Directors
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1. Purpose

KRAFTIGS Australia Pty Ltd (ACN 650 985 121, ABN 21 650 985 121) (KRAFTIGS, we, us) is a private company registered in New South Wales. We explore for and develop gold projects in Australia and overseas, working with experienced local operators and technical partners engaged for each project.

KRAFTIGS does not tolerate bribery or corruption in any form. This policy sets out the rules our people and associates must follow, and forms part of the procedures we use to prevent bribery, including bribery of foreign public officials.

Bribing a foreign public official is a serious crime under Division 70 of the Criminal Code Act 1995 (Cth), wherever in the world it happens. Since September 2024, a company can also commit an offence if an associate (such as an employee, contractor, agent or partner acting for it) bribes a foreign public official for the company's benefit, unless the company can show it had adequate procedures in place to prevent this (section 70.5A). Bribery of Australian public officials and private-sector (commercial) bribery are also offences under Commonwealth and State law, and the countries where our projects are located have their own anti-corruption laws.

2. Scope

This policy applies to directors, officers, employees, contractors and consultants of KRAFTIGS, and to any person who performs services for us or on our behalf, including local operators, technical partners, agents, intermediaries and joint venture partners (together, **associates**). It applies in Australia and in every country where our projects are located.

3. Policy statements

No bribes. Nobody may offer, promise, give, request or accept anything of value, directly or indirectly, to improperly influence a public official or any other person to obtain or keep business, a licence, a permit or any other advantage. This applies whether the person is a government official, an employee of a state-owned company, a community leader or a private individual, and whether or not the bribe succeeds.

No facilitation payments. We do not make small unofficial payments to speed up routine government actions, even where local practice tolerates them. Official fees paid to a government body against an official receipt are not facilitation payments.

Personal safety comes first. If anyone faces an immediate threat to their safety or liberty unless they pay, they may pay. They must report the payment to the Chief Executive Officer as soon as it is safe, and it must be recorded accurately.

Gifts and hospitality. Gifts and hospitality given or received must be modest, infrequent, openly given and never in cash or cash equivalents. Nothing may be given to an official who is deciding on a matter affecting KRAFTIGS, such as a licence or permit application. Anything above A\$200 needs prior approval from the Chief Executive Officer and is recorded in the gifts and hospitality register.

Political donations. KRAFTIGS does not make donations to foreign political parties, officials or candidates. Any political donation in Australia needs prior approval from the directors and must comply with electoral disclosure laws.

Community contributions and sponsorships. Community support near our projects is welcome, but it must be transparent, documented, paid to an organisation rather than to an individual, and never linked to a pending decision by an official.

Third parties. Before engaging a local operator, technical partner, agent or other associate, we carry out risk-based due diligence on who owns and controls them, their reputation and any links to public officials. Their contract must include anti-bribery obligations, audit or information rights, and a right for us to terminate for breach. Fees must be reasonable for the work done and paid only to an account in the name of the contracted party.

Investors and funding. We identify the investors and co-funders we work with and the source of their funds before we accept money for a project.

Risk assessment. Before committing to a new project or country, we assess its bribery and corruption risks and decide which extra controls are needed. We repeat this when the project changes stage.

Accurate books and records. Every payment, gift, hospitality item and contribution must be recorded accurately and with enough detail to show what it was for. Off-book accounts, false invoices and disguised payments are prohibited.

Dealing with officials. Where practical, two KRAFTIGS representatives attend meetings with officials about licences, permits or inspections, and a short note of the meeting is kept.

Training. Our people and higher-risk associates receive anti-bribery training on joining and every year, and confirm in writing that they will comply with this policy.

4. Responsibilities

- **Directors** approve this policy, make clear, from the top, that bribery is never acceptable and review bribery risk on each project.
- **The Chief Executive Officer** owns this policy, keeps the gifts and hospitality register, oversees due diligence on third parties and arranges training.
- **Managers and project leads** make sure associates on their project know and accept this policy and that controls are applied in practice.
- **All our people and associates** follow this policy and report any request for, or offer of, a bribe.

5. Reporting concerns

Report any suspected bribery, any request for an improper payment, or any breach of this policy to the Chief Executive Officer or through the channels in our Whistleblower Policy, which allows anonymous reports. Nobody will be penalised for refusing to pay a bribe, even if KRAFTIGS loses business as a result.

6. Breaches

A breach of this policy may lead to disciplinary action, including dismissal, and to termination of contracts with associates. Bribery can lead to criminal penalties for individuals and the company. Where appropriate, we will report suspected offences to the authorities.

7. Review

We will check how this policy is working at least once a year as part of reviewing our project risks, and review the policy itself at least every two years, or earlier if the law or our activities change.

Changes must be approved by the Board of Directors.

General enquiries about this policy: the Chief Executive Officer, KRAFTIGS Australia Pty Ltd, 24 Iraking Ave, Moorebank NSW 2170, or info@kraftigs.com.au.