

Anti-Bribery and Corruption Policy

Last updated: 24 March 2022

Our Commitment

- Australian Strategic Materials (ASM) commits to acting with integrity, accountability, honesty, and transparency.
- We commit to complying with the laws of each country where we operate.
- We will not tolerate bribery, corruption, or money laundering (BCM) from anyone associated with ASM or our operations. These activities undermine legitimate business activities, distort competition, and expose ASM and its personnel to significant risks.

Our Principles

We will:

- Never offer, pay, solicit, or accept bribes.
- Never offer or accept an item, money, travel, hospitality, entertainment, or other token of appreciation that could be viewed as favouritism, discrimination, or collusion.
- Never engage in any form of corruption or money laundering, whether for the perceived benefit of ASM, our personnel or other parties.
- Provide regular, critical anti-bribery, corruption and money laundering education and awareness training to all personnel.
- Conduct monitoring of compliance with this policy.
- Track the effectiveness of this Policy, continually improve our approach, and report on progress.

For further guidance please see our **Anti-Bribery-and-Corruption Standard** available on the ASM website (asm-au.com)

Everyone's Responsibility

Australian Strategic Materials expects all employees, contractors, suppliers, and customers to adhere to this policy.

Australian Strategic Materials will not allow any form of retaliation, discrimination, harassment, or intimidation against anyone who decides to Speak-Up under this Policy, or on any other occasion when they feel it is necessary.

At Australian Strategic Materials we foster a culture of corporate compliance, ethical behaviour, and good corporate governance. This reflects our values of Integrity, Effectiveness, Sustainability, Professionalism, Transparency, Safety and Wellbeing.

INTERNAL USE ONLY

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