

ALIEN METALS LTD
ANTI-CORRUPTION AND BRIBERY POLICY

Introduction

Alien Metals Ltd (the “Company”) will not tolerate any form of bribery by, or of, its employees, temporary workers, agents or consultants or any person or body acting on its behalf. The Company and its senior management are committed to implementing effective measures to prevent, monitor and eliminate bribery.

Any breach of this policy is likely to constitute a serious disciplinary, contractual and criminal matter for the individual(s) concerned, may cause serious damage to the reputation and standing of the Company and, in certain cases, may lead to the prosecution of the Company and its senior managers.

For employees, any breach of this policy is likely to be deemed gross misconduct and give rise to dismissal.

Definitions

“Bribery” means the offering, promising, giving, accepting or soliciting of an advantage as an inducement for an action which is illegal, unethical, or a breach of trust. “Bribes” or “inducements” can take many forms, including but not limited to, gifts, loans, fees, rewards, donations, facilitation payments, and services, travel or accommodation either at a reduced rate or without charge.

A “facilitation payment” is a payment or gift (usually to a government official) to expedite or perform a procedure, but does not include fees required to be paid by law.

“Relevant Person” means all directors, employees, agents, consultants, and any other person or body working on behalf of the Company.

Unacceptable behaviour

No Relevant Person may, in connection with their relationship with the Company, and whether directly or indirectly, accept, request, offer or pay a bribe or inducement.

No Relevant Person may encourage a third party to engage in any act of Bribery on behalf of the Company.

No employee will suffer demotion, penalty or other adverse consequences for refusing to pay a bribe, even if such refusal results in the Company losing business.

The Company will take appropriate action wherever it sees the opportunity to stop the practice of facilitation payments or bribery, generally.

If at any time, an employee or representative of the Company considers themselves under extreme duress and has genuine cause for concern for the welfare and safety of themselves or their family, a facilitation payment or bribe may exceptionally be made. Any such Bribe must be reported at the earliest convenience to the Company Secretary.

Donations to organisations

“Donation” in this context means any gift, subscription, loan, advance or deposit of money, or anything of value or money’s worth.

The Company does not make political donations.

Donations to charitable organisations must not be made, directly or indirectly without the prior written approval of the Chief Executive.

Responsibilities

It is the responsibility of all those working on the Company’s behalf, to seek to prevent, detect, and to report bribery. In the event that bribery is detected, it must be reported without delay, to one of the named contacts below.

Compliance

All employees are required explicitly confirm they have received a copy of this policy and that they understand it and will comply with it.

The Company reserves the right to terminate its contractual arrangements with any organisation, at any time and without penalty, if they are found to be in breach of the Bribery Act 2010.

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