ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

1 Objective

Lunnon Metals Limited (**Lunnon Metals** or the **Company**) is committed to conducting its business and activities in accordance with all applicable laws, rules and regulations and with the highest integrity.

The Company has a zero-tolerance approach to bribery and corruption and is committed to acting professionally, fairly and with integrity in all business dealings. The objective of this Policy is to:

(a) set out the responsibilities of the Company and its management in observing and upholding the Company's position on and commitment to preventing any form of bribery and corruption;

(b) reinforce the Company's values; and

(c) provide information and guidance to those working for the Company on how to recognise and deal with bribery and corruption issues.

2 Introduction to Bribery and Corruption

Bribery is the act of:

(a) offering, promising, giving or accepting a benefit;

(b) with the intention of influencing a person (who is expected to act in good faith or in an impartial manner) in the performance of their role or function; and

(c) to provide the Company with business or a business advantage that is not legitimately due (whether in respect of an interaction with a public official or any commercial transaction in the private sector).

Bribery can also take place where an improper payment is made by or through a third party.

Corruption is the misuse of public power for private profit, or the misuse of entrusted power for private gain.

Bribes and kickbacks can take many forms, including:

(a) payments of money, whether by employees or business partners (such as agents or consultants);

(b) giving of gifts or tokens of appreciation and gratitude;

(c) excessive or inappropriate entertainment, hospitality, travel and accommodation expenses or invitations to such events in connection with the Company's business;

(d) other 'favours' provided to public officials or customers, such as engaging a company owned by a public official or customer's family, or making political contributions;

(e) phony jobs or "consulting" relationships; or

(f) phony jobs or "consulting" relationships; or

(g) the uncompensated use of company services, facilities or property.

unless they meet all of the following:

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

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

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

This 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 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 Policy, this Policy prevails. The Company may, from time to time, provide country-specific directions for subsidiaries operating in countries outside of Australia.

3 Scope

This Policy applies to all employees, directors, executive management, suppliers, consultants, customers, joint venture partners (where they agree to be bound by the Policy) as well as temporary and contract staff (including subcontractors) (**Representatives**).

Representatives must ensure that they do not become involved, in any way, in the payment of bribes or kickbacks, whether in the public or commercial sector.

This Policy sets out the minimum standards to which all Representatives of the Company must adhere to at all times, and supplements the Company's Code of Conduct, Conflict of Interest Policy and anti-corruption legislation (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).

Interactions by Representatives with public officials and third parties must comply with this Policy, and the Company and Representatives 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 Policy include a prohibition on employees using personal funds to undertake any interaction or transaction that is prohibited under this Policy.

4 Anti-bribery and anti-corruption policy

4.1 Policy details

No Representative of the Company is permitted to pay, offer, accept or receive a bribe in any form, or engage in corruption or improper conduct or money laundering. A Representative must never:

(a) offer, pay or give anything of value to a public official in order to obtain business or anything of benefit to the company. **Public official** should be understood very broadly, and this means anyone paid directly or indirectly by the government or performing a public function, including officials of state-owned enterprises and public international organisations;

(b) attempt to induce a public official, whether local or foreign, to do something illegal or unethical;

(c) pay any person when you know, or have reason to suspect, that all or part of the payment may be channelled to a public official. You should therefore be careful when selecting third parties, such as agents, contractors, subcontractors and consultants;

(d) offer or receive anything of value as a "quid pro quo" in relation to obtaining business or awarding contracts. Bribery of "public officials" is a serious matter, but bribery of those working in the private sector is also illegal and contrary to the Company's Code of Conduct;

(e) establish an unrecorded (slush) fund for any purpose;

(f) otherwise use illegal or improper means (including bribes, favours, blackmail, financial payments, inducements, secret commissions (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) or other rewards) to influence the actions of others; or offering anything of value when you know it would be contrary to the rules of the recipient's organisation for the recipient to accept it;

(g) make a false or misleading entry in the company books or financial records – accurate recordings of dealings with third parties must be maintained;

(h) act as an intermediary for a third party in the solicitation, acceptance, payment or offer of a bribe or kickback;

(i) so-called "facilitation" or "grease" payments are prohibited. Such payments should not be made to public officials, even if they are nominal in amount and/or common in a particular country. A **facilitation payment** is a payment to a public or government official that acts as an incentive for the official to complete some action or process expeditiously, to the benefit of the party making the payment and where the payment is not intended to influence the outcome, only its timing. A payment is not a "facilitation" if there are published fees for shorter approval or processing times (e.g. for visas);

(j) do anything to induce, assist or permit someone else to violate these rules; and

(k) ignore, or fail to report, any suggestion of a bribe.

As well as complying with the specific prohibitions in this Policy, Representatives must:

(a) exercise common sense and judgement in assessing whether any arrangement could be perceived to be corrupt or otherwise inappropriate;

(b) report any breaches of, or suspicious behaviour related to this Policy

(c) 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 and corrected; and

(d) take note of the requirements of the Company's Conflict of Interest Policy, with particular focus on the Gifts and Hospitality section.

4.2 Agents and Intermediaries

(a) Representatives should not hire an agent, consultant or other intermediary if they have reason to suspect that they will pay bribes on behalf of the Company's behalf.

(b) Representatives should seek to ensure that any third parties that are hired will not make, offer, solicit or receive improper payments on behalf of the Company. All fees and expenses paid to third parties should represent appropriate and justifiable remuneration for legitimate services to be provided and should be paid directly to the third party. Accurate financial records of all payments must be kept.

(c) All business units should adopt appropriate procedures directed towards ensuring that their arrangements with third parties do not expose them to non- compliance with this Policy. Such procedures should assist Representatives in determining whether particular third parties present a corruption risk and, if so, what steps should be taken to address that risk. This may include, in particular, cases where a third party is engaged to act on behalf of the Company:

(i) to solicit new business;

(ii) to interact with public officials; or

(iii) in other high risk situations.

(d) Representatives must also be aware of factors which suggest the third party may pose a high corruption risk, and consult with their line managers to assess whether there is a need for enhanced due diligence and monitoring, or whether a proposed relationship should not proceed.

4.3 Gifts, entertainment and hospitality

The Company prohibits the offering or acceptance of gifts, entertainment or hospitality in circumstances which would be considered to give rise to undue influence. All Representatives must notify the Company Secretary or Chief Executive Officer of any gifts and/or benefits, either offered or accepted and valued at AUD$500 or more, to safeguard and make transparent their relationships and dealings with third parties.

4.4 Charitable and political donations

The Company does not make political donations or payments.

Specific examples of political donations include:

(a) a donation of money;

(b) a contribution, entry fee or other payment to participate in a fundraising event or function where it is primarily a political fundraiser and payment forms part of the proceeds of the event;

(c) a subscription paid to a political party for membership or affiliation;

(d) non-cash payments such as gifts or prizes for a political fundraiser or purchasing items at a political fundraiser;

(e) the provision of goods or services, at no charge or at a discounted rate (e.g. the use of a company vehicle or office facilities); or

(f) a loan.

Charitable donations can in some circumstances be used as a disguise for bribery, e.g. where a donation is provided to a 'charity' which is controlled by a public official who is in a position to make decisions affecting the Company. Therefore, whilst the Company supports community outreach and

charitable work, recipients must be subject to a suitable due diligence and approval process in all circumstances. It must be clear who the actual recipient of the donation is and for whose benefit the donation is ultimately made, and be within approved financial limits.

4.5 Political Involvement of Directors, Officers and Employees

(a) Lunnon Metals acknowledges the right of individuals to participate in the political process. This policy does not seek to restrict employees from having political views or associations (including membership of political parties, attendance at political events or making Political Donations). For the avoidance of doubt, employees should make it clear that any political involvement is purely in a personal capacity and does not represent the views of Lunnon Metals.

(b) Directors and executive leadership team members of Lunnon Metals (and spouses/partners of Directors and executive leadership team members) must not make political donations in their personal capacity without prior approval of the Company Secretary.

4.6 Mergers and acquisitions

An anti-corruption due diligence on companies which the Company is considering acquiring should be performed during the overall due diligence process. The following risk areas should be considered during the due diligence process:

(a) an entity's control environment: policies, procedures, employee training, audit environment and whistleblower issues;

(b) any ongoing or past investigations (government or internal), adverse audit findings (external or internal), or employee discipline for breaches of anti- corruption law or policies;

(c) the nature and scope of an entity's government sales and the history of significant government contracts or tenders. Risks include improper commissions, side agreements, cash payments and kickbacks;

(d) an entity's important regulatory relationships, such as key licenses, permits, and other approvals. Due diligence in that context would focus on employees who interact with these regulators, and whether there are any fees, expediting payments, gifts or other benefits to public officials;

(e) travel, gifts, entertainment, educational or other expenses incurred in connection with marketing of products or services, or in connection with developing and maintaining relationships with government regulators. Diligence in this area would include examining expense records, inspection or training trips, and conference attendee lists and expenses;

(f) an entity's relationships with distributors, sales agents, consultants, and other third parties and intermediaries, particularly those who interact with government customers or regulators; and

(g) an entity's participation in joint ventures or other teaming arrangements that have significant government customers or are subject to significant government regulation.

4.7 Reporting bribery and suspicious activity

(a) If you become aware of any actual, suspected or planned breach of this Policy or if you are ever offered any bribe or kickback, you must report this immediately to the Company Secretary, the Chief Executive Officer or any other person mentioned in the “Whistleblower Policy” to whom

a report can be made. Information on how to make a report is included in the Company's "Whistleblower Policy".

(b) The Company expects all Representatives whether full-time, part-time or temporary acting in good faith to report unethical or fraudulent conduct without fear or favour.

(c) Customers and suppliers are also encouraged to report unethical and fraudulent activities and (in the case of customers) activities that could constitute, or could be perceived to be, collusion or price fixing.

4.8 Consequences of breaching this Policy

(a) Bribery and the related improper conduct addressed by this 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 Policy may also expose Representatives 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 Policy by Representatives will be regarded as serious misconduct, leading to disciplinary action which may include termination of employment.

5 Enquiries

Enquiries about this Policy should be directed to the Company Secretary or the Chief Executive Officer.

6 Roles and Responsibilities

(a) It is the responsibility of all Representatives to know, understand and adhere to this Policy and attend all relevant training when offered.

(b) All Representatives acting on the Company's behalf, whether directly or indirectly, by representing the Company's interests are required to be made aware of this Policy and to undertake to comply with this Policy in relation to any of their dealings with, for or on behalf of the Company.

(c) The Board has direct responsibility for the Policy, for maintaining it and for providing advice and guidance and monitoring of its implementation.

(d) All business unit managers are directly responsible for implementing the Policy within their business areas, and for adherence by their staff.

(e) The Board must ensure that managers and employees likely to be exposed to bribery and corruption are trained to recognise and deal with such conduct in accordance with this Policy.

(f) The Company 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.

7 Compliance

(a) Representatives are required to familiarise and fully comply with this Policy.

(b) Any Representative who fails to comply with the provisions as set out above or any amendment thereto, may be subject to appropriate disciplinary or legal action.

(c) The Company's policies, standards, procedures and guidelines comply with legal, regulatory and statutory requirements.

(d) This Policy may be amended from time to time in the sole discretion of the Company.

(e) The Board is responsible for reviewing this Policy to determine its appropriateness to the needs of the Company from time to time.

8 Related Documents

(a) Lunnon Metals Ltd Code of Conduct.

(b) Lunnon Metals Ltd Whistleblower Policy.

(c) Lunnon Metals Ltd Conflicts of Interest Policy.

9 Document Control

Version Number	Revision Date	Document Owner	Document Approver
Version 2.1	21 May 2024	CFO	Board of Directors
Version 2.2	08 May 2025	MD	Board of Directors
Version 2.3	05 May 2026	MD	Board of Directors