



Anti-Bribery & Corruption Policy

1. Summary

Emmerson Resources Limited (**Emmerson**) is committed to operating fairly and ethically in compliance with all applicable laws, including ant-corruption laws of every country in which we operate.

Emmerson is committed to a zero-tolerance approach to bribery and corruption. Our reputation is built on our values as a company, the professionalism of our employees and our collective commitment to acting with integrity, accountability and transparency at all times.

2. Scope

This Anti-Bribery and Corruption Policy (**Policy**) extends to all Emmerson’s business dealings and transactions. All directors, officers and employees of Emmerson are required to comply with this Policy.

Bribery and corruption undertaken by anyone acting on behalf of Emmerson is strictly prohibited.

3. General Review Prohibition

The following rules are to be strictly complied with by **ALL** directors, officers and employees:

- a) never offering, paying, soliciting or accepting bribes in any form (including facilitation payments);
- b) never offering or accepting any item, money, travel, hospitality, entertainment or other token of appreciation that may be construed or used by others to allege favoritism, discrimination, collusion or similarly unacceptable practices¹; and
- c) never engaging in any form of corrupt business practice, whether for the benefit of Emmerson, yourself or another party.

4. Responsibility

All Emmerson, employees, contractors, consultants and other business partners are expected to read, understand and adhere to this Policy and all related guidelines, policies and procedures.

Emmerson takes all reported concerns seriously and where appropriate will investigate reports of bribery and corruption in any way connected to Emmerson or a related entity.

All employees have a responsibility and are encouraged to prevent and help detect bribery and corruption. Employees are encouraged to raise any concerns through established reporting channels about any behavior that violates this Policy.

5. Policy Review

This policy is to be reviewed by the Board at least every two years.

¹ For the purposes of this Policy the threshold requiring disclosure to management or the Board in the case of management is \$500.

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