

## Anti-Bribery and Corruption Policy

### Purpose

Federation Mining (The "Company") is committed to complying with the laws and regulations of the countries within which it operates and ensuring that all business is conducted ethically and in accordance with its values. This policy has been created to provide clarity to all Personnel on these expectations.

### Definitions

In this Policy:

"Personnel" shall mean:

- all directors, senior executives, employees and officers of the Company;
- contractors (including sub-contractors) occupying permanent or part time fixed term contracts;
- consultants or suppliers of goods or services and their employees; or
- third parties including intermediaries and associates.

### Scope

This policy applies to all Federation Personnel.

### Oversight & Enforcement

The implementation, monitoring and review of this policy is the responsibility of the Vice President responsible for Human Resources and the Board will be provided regularly reports on progress and performance.

### Policy

Personnel must not offer, promise, give, demand or accept any undue advantage or bribe, whether directly or indirectly, to or from:

- A public official
- A political candidate, party or party official
- A community leader or other person in a position of public trust, or
- Any private sector employee in order to obtain, retain or direct business or to secure any other improper advantage in the conduct of business

Federation prohibits the giving or receiving of gifts, or invitations involving travel, accommodation and entertainment in circumstances which could be considered to give rise to undue influence. All gifts offered and received must be reported to the employee's direct manager and if valued over \$400 must be entered into the gift register. All gifts must be documented in the Company's gift register within 5 days of receiving. Gifts cannot be accepted on a reoccurring basis or in parts of less than \$100.

Gifts which are exemptions from the above rule:

- Work related conferences
- Invitations to speak at a professional association (including flights and accommodation)
- Working lunches
- Where the gift is part of a sponsorship arrangement

Failure to comply with the requirements of this policy will be investigated appropriately and addressed in accordance with Federation's Human Resources processes.

Federation supports an open and supportive environment, where employees can raise matters related to this policy in an appropriate and if required, anonymous manner.

Federation strongly encourages all Employees and consultants to report immediately to their direct manager or functional executive on any information that may relate to or be in breach of this policy including where there is actual or suspected bribery, fraud or corruption. The Whistleblower Policy may be an appropriate reporting channel for this notification.

It is acknowledged that breaches of this policy may result in serious criminal and/or civil penalties as well as damage to Federation's reputation.

As part of maintaining Federation's Code of Conduct and its corporate governance and integrity framework, Federation promotes staff awareness of, and compliance with this Policy through regular communication and training (both upon joining Federation and annually thereafter).

Any material breaches of this policy will be reported to the Board, or relevant Board Sub-Committee. This policy will be subject to annual review or as relevant legislative and corporate governance requirements changes occur.

Signed: Mark Le Messurier

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Managing Director

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