



Globe
Metals & Mining

Anti-Bribery and Corruption Policy

September 2023

1. INTRODUCTION

- (a) As an ASX-listed entity, Globe (including Globe Personnel) has obligations under the Listing Rules and the Corporations Act to conduct its operations in accordance with good Corporate Governance practices and principles. Failure to do so is likely to result in a loss of reputation, poor decision-making, exposure to increased risk, poor staff retention, disruptive behaviour, and have a material effect on the price or value of the entity's securities. In extreme cases, it may result in disciplinary action, imposition of penalties, criminal actions or civil suits against individuals or Globe.
- (b) The Board and Globe's executive team are committed to conducting business with honesty and integrity and therefore commit and adhere to a zero-tolerance approach to Bribery and Corruption.
- (c) This Policy:
 - (i) is designed to protect the reputation, integrity and interests of Globe, its subsidiaries, and all Globe Personnel; and
 - (ii) forms part of Globe's risk management framework and other associated risk and compliance policies.
- (d) Under this Policy, Globe Personnel must:
 - (i) not give or accept gifts and/or benefits that will compromise, or appear to compromise, their integrity and objectivity in performing their duties;
 - (ii) not give or accept gifts and/or benefits that cause, or appear to cause, a conflict of interest;
 - (iii) record in Globe's Gifts and Entertainment Register any gift or benefit that is either given or received and is valued at \$100 or more; and
 - (iv) decline gifts and/or benefits worth \$400 or more (unless an exception applies).
- (e) This Policy has global application. Where operating or travelling outside of Australia, Globe Personnel are subject to the laws of the country they are in; however, the principles of this Policy must be followed regardless of whether or not that country has specific Bribery and Corruption laws. Where a country has specific Bribery and Corruption laws which are of a lesser standard to this Policy, this Policy prevails.
- (f) This Policy should be read together with Globe's Code of Conduct and other policies. If there is any inconsistency between this Policy and Globe's Code of Conduct or other policies, then this Policy prevails to the extent of the inconsistency.
- (g) This Policy applies to the Group and all Globe Personnel.

2. DEFINITIONS

In this Policy, unless the context otherwise requires:

ASX means the Australian Securities Exchange.

Board means the board of Directors as constituted from time to time.

Bribe means any payment, gift, loan, fee, or reward, to or from any person in order to influence them corruptly or improperly in the exercise of their duty.

Bribery means the act of giving, offering, promising, requesting, agreeing to receive, or receipt or acceptance of, a Bribe.

CEO means the chief executive officer of Globe from time to time.

Chairperson means the chairperson of the Board from time to time.

Company Secretary means the company secretary of Globe from time to time.

Corporate Governance means the framework of rules, relationships, systems, and processes within and by which the authority is exercised and controlled within organisations.

Corporations Act means the *Corporations Act 2001 (Cth)*.

Corruption means the misuse or abuse of a public or private office or power for personal gain, including (but not limited to) money laundering, embezzlement, facilitation payments, kickbacks, falsification of records, and theft.

Directors means the directors of Globe from time to time and **Director** means any one of them.

Globe means Globe Metals & Mining Limited (ABN 33 114 400 609).

Globe Personnel means Globe's directors, executives, employees, and contractors.

Group means Globe and its controlled entities.

Listing Rules means the listing rules of ASX.

Policy means this Anti-Bribery and Corruption Policy as amended and adopted by the Board from time to time.

3. LAWS AND REGULATIONS

- (a) Globe operates under laws which make illegal any form of Bribery, including giving or receiving Bribes, "facilitation payments", and Bribery of foreign public officials.
- (b) Bribery and Corruption are criminal offences, and the penalties can be severe for both companies and individual employees. Bribery and Corruption are punishable for

individuals by imprisonment and/or a fine, and if Globe is found to have taken part in Corruption it could face a fine, be excluded from certain activities, and suffer damage to its reputation. Therefore, Globe takes its legal responsibilities very seriously and expects all Globe Personnel to do the same.

- (c) Globe complies in full with the laws and regulations of those countries in which it operates. There is legislation in many countries, including Australia and the United Kingdom (both of which have extra-territorial reach), that prohibits Bribery and Corruption. Similar laws also exist in, or apply to, other jurisdictions in which Globe operates. Acts of Bribery and Corruption committed overseas by Globe Personnel may also result in a prosecution in Australia and other jurisdictions.

4. POLICY

4.1 Bribes

Globe Personnel are not permitted to give, offer, promise, accept, request, or authorise a Bribe, whether directly or indirectly.

4.2 Gifts and Hospitality

- (a) **(Initial Assessment):** Before giving or accepting a gift and/or benefit, regardless of value, Globe Personnel must first assess whether giving or accepting the gift and/or benefit may:

- (i) compromise, or appear to compromise, their integrity and objectivity in performing their duties; or
- (ii) cause, or appear to cause, a conflict of interest.

If either (i) or (ii) above applies, Globe Personnel should defer from giving or accepting the gift and/or benefit. If in doubt, Globe Personnel should discuss giving or accepting the gift and/or benefit with the CEO, or in the case of the CEO, the Chairperson, to determine the appropriate action.

- (b) **(Secondary Assessment):** If Globe Personnel are satisfied that neither (i) or (ii) above applies, or approval has been obtained, then they may give or accept the gift and/or benefit provided that:

- (i) gifts and/or benefits should not be given or accepted on a recurring basis;
- (ii) any gift and/or benefit valued at \$100 or more must be declared in Globe's Gifts and Entertainment Register by the person giving or accepting the gift and/or benefit within 5 business days; and
- (iii) any gift and/or benefit valued at \$400 or more must be approved by the CEO, or in the case of the CEO, the Chairperson, with the exception of:

- (A) reasonable food, refreshments, accommodation, and travel costs incurred whilst undertaking work-related travel; and
- (B) customary or statutory allowances in relation to work-related conferences, invitations to speak at a professional association (including flights and accommodation), and work-related lunches.

4.3 Facilitation Payments

- (a) Facilitation payments are a form of Bribery made for the purpose of expediting or facilitating the performance of a routine governmental action by a public official, for example, processing papers, issuing permits, and other actions, with the intention of expediting the performance of duties of a non-discretionary nature which they are already bound to perform.
- (b) Facilitation payments, whether legal or not in a particular country, are prohibited under this Policy.

4.4 Political Donations

- (a) Globe may make donations to political parties from time to time provided that they are legal and ethical under local laws and practices and are first approved by the Chairperson and CEO.
- (b) All political donations made by Globe must be disclosed in Globe's Annual Report in the relevant year.

4.5 Charitable Donations

- (a) Charitable support and donations are acceptable (and encouraged in the community), whether of in-kind services, knowledge, time, or direct financial contributions. However, Globe Personnel must be careful to ensure that charitable donations are not used as a scheme to conceal Bribery.
- (b) Globe can only make charitable donations that are legal and ethical under local laws and practices. In Australia, this means that an organisation must have deductible gift recipient status with the Australian Taxation Office. This status ensures the relevant organisation is entitled to receive deductible gifts and make deductible contributions.
- (c) Prior approval of the CEO must be obtained for all charitable donations up to (but not exceeding) \$1,000. Charitable donations that exceed \$1,000 must be approved by the Board.
- (d) All charitable donations made by Globe must be disclosed in Globe's Annual Report in the relevant year.

5. RESPONSIBILITIES

- (a) Globe Personnel must ensure they read, understand, and comply with this Policy. The prevention, detection, and reporting of Bribery and other forms of Corruption are the collective responsibility of all those working for the Group.
- (b) Globe Personnel are required to avoid any activity that may result in a breach of this Policy.
- (c) Globe Personnel must notify the CEO, alternatively the Company Secretary, as soon as possible if they believe or suspect that a conflict with, or breach of, this Policy has occurred or may occur in the future.

6. RECORD-KEEPING

- (a) Globe must keep financial records and have appropriate internal controls in place to evidence the business reason for making payments to third parties.
- (b) Globe Personnel must declare and enter gifts or benefits, either given or received, valued at \$100 or more in Globe's Gifts and Entertainment Register within 5 business days.
- (c) All accounts, invoices, memoranda and other documents and records relating to dealings with third parties, such as clients, suppliers, and business contacts, should be prepared and maintained with strict accuracy and completeness. No accounts may be kept "off-book" to facilitate or conceal improper payments noting that it is an offence under applicable law for a person to make, alter, destroy, or conceal an accounting document (including reckless conduct which permits such acts) to facilitate, conceal, or disguise corrupt conduct.

7. HOW TO RAISE A CONCERN

- (a) Under Globe's Code of Conduct, all Globe Personnel have a responsibility to help detect, prevent, and report instances of Bribery and Corruption as well as any other suspicious activity or wrongdoing in connection with Globe's business.
- (b) Globe is committed to ensuring that all Globe Personnel have a safe, reliable, and confidential way of reporting any suspicious activity. Globe Personnel are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage with the CEO. If Globe Personnel are unsure whether a particular act constitutes Bribery or Corruption, or if they have any other queries or concerns, the matter should be raised with the Company Secretary.
- (c) If, for any reason, Globe Personnel are not comfortable speaking directly to the CEO, Globe has a Whistleblower Policy which affords certain protections against reprisal, harassment, or demotion for reporting such matters.

8. MORE INFORMATION

Globe Personnel who have queries about this Policy should contact the Company Secretary.

9. CONSEQUENCES OF A BREACH OF THIS POLICY

- (a) A breach of this Policy by Globe may result in:
 - (i) criminal and civil liabilities under the Corporations Act; and
 - (ii) negative publicity for Globe and damage to its reputation in the market.
- (b) Globe Personnel who are involved in a breach of this Policy by Globe may also face criminal and civil liability.
- (c) A breach of this Policy by Globe Personnel may lead to disciplinary action, which may include termination of employment or engagement.

10. POLICY REVIEW

This Policy is to be reviewed by the Board on a periodic basis.