

ANTI-BRIBERY AND CORRUPTION POLICY



FINDER ENERGY HOLDINGS LIMITED (ACN 656 811 719)

1 Introduction

Finder Energy Holdings Limited (ACN 656 811 719) (**Finder**) is committed to fostering a culture of compliance and ethical behaviour. This Policy confirms our commitment to a zero tolerance approach to corruption.

2 Policy application

This Policy applies to all directors, management and staff of Finder and its subsidiaries (**Group**).

A breach of this Policy will be regarded as serious misconduct which may lead to disciplinary action, including removal or dismissal. Failure to comply strictly with this Policy may expose you or the Group to serious civil or criminal liability and may damage the Group's reputation.

3 Corruption – overview

Corruption is the dishonest activity involving the abuse of position and/or trust to obtain an advantage (whether a personal advantage or an advantage for Finder or another member of the Group).

Bribery is a form of corruption and includes the offering, promising, giving or accepting or soliciting of anything of value (including a financial or other advantage) to improperly influence actions. Improper influence involves the intent to induce an action which is illegal, unethical or a breach of trust (a misuse of someone's position).

Corruption can take many forms, is often disguised and may be difficult to trace or detect. Some common examples include:

- money (or cash equivalent such as shares, gift cards etc);
- unreasonable or extravagant gifts, entertainment or hospitality (including free or heavily discounted upgrades or free or heavily discounted flights, accommodation or other products);
- benefits and perks to relatives, including employment, education, training etc;
- inflated or false invoices (or enhanced fees/commissions);
- unwarranted allowances or expenses;
- kickbacks; and
- "facilitation payments" (being, payments, gifts or benefits as an inducement for securing or expediting routine performance of a person's duties).

Corruption may be direct or indirect through the use of an intermediary or agent. It may not involve large sums of money – and in fact, corruption may occur even if no money is exchanged. An offence can occur even if the corrupt behaviour is unsuccessful (eg, the conduct sought to be induced does not occur).

4 Your responsibilities

You must:

- **not** use the Group's name, information or position for your personal gain;

- **not** accept or offer bribes or improper inducements from or to anyone;
- **not** pay secret commissions to those acting in an agency or fiduciary capacity;
- **not:**
 - make political or charitable donations on behalf of the Group; or
 - offer or accept gifts, entertainment or hospitality, except in accordance with this Policy;
- consult with your direct report if you are unsure about whether you can offer or receive a payment, gift or benefit in a particular situation;
- report breaches of this Policy in accordance with Finder's Whistleblower Policy¹; and
- attend anti-bribery and corruption training.

5 Company Secretary's role

The Company Secretary is responsible for:

- maintaining records of any donations, gifts, entertainment and hospitality that are approved in accordance with this Policy; and
- ensuring the Board or its delegated committee is informed of any material breaches of this Policy.

6 Political and charitable donations

Political donations, engagement and lobbying

All dealings with politicians and government officers must be conducted at arm's length and with the utmost professionalism to avoid any perception of attempting to gain an advantage. Political donations on behalf of the Group are only allowed where legally permitted and first approved by the Finder Board.

Attendance at political functions in a professional capacity is permitted where there is a legitimate business reason subject to compliance with Finder's pre-approval, notification and registration requirements.

Political lobbying may only be done by authorised employees and must be done in a manner consistent with Finder's values and this Policy.

This does not restrict your right to make political donations or have political affiliations in a personal capacity.

Charitable donations and sponsorships

Charitable donations and sponsorships on behalf of the Group must be made only to approved not-for-profit organisations that reflect Finder's values and comply with Finder's pre-approval, notification and registration requirements in relation to charitable donations and sponsorships.

7 Gifts, entertainment and hospitality

You must not offer or accept gifts, entertainment or hospitality in your dealings with others on behalf of the Group, which are extravagant, excessive or could give rise to a perception that the Group was compromised or obligated in any way.

Modest gifts, entertainment or hospitality are allowed, for business purposes, where legally permitted and in accordance with local business practices. As a general policy, the offer or acceptance of gifts, entertainment or hospitality is not prohibited where it:

- is directly connected to a legitimate business purpose or activity (eg, building or maintaining a business

¹ We encourage a 'speak up culture' of all issues and concerns relating to Finder. Unless you are confident your issue or concern is a solely personal work-related grievance (see section 5 of our Whistleblower Policy), we encourage you to raise it in accordance with our Whistleblower Policy. We may investigate your disclosure in accordance with our Whistleblower Policy, even where your disclosure may not qualify for protection under the Australian whistleblower laws.

relationship);

- is occasional and of an appropriate value and nature;
- it cannot reasonably be construed as an attempt to improperly influence the performance or the role or function of the recipient;
- does not include cash loans or cash equivalents (eg, gift certificates or vouchers);
- is given and received openly and transparently; and
- complies with Finder's internal pre-approval, notification and registration requirements.

8 Dealings with third parties

Finder deals with clients, customers, suppliers, distributors, contractors, consultants and business partners. Before engaging with any of these parties, Finder will undertake appropriate due diligence.

9 Training

Finder will educate directors, management and staff (where appropriate) and raise awareness about this Policy.

10 Policy review

Finder will periodically review this Policy to check that it is operating effectively.

The Company Secretary is authorised to make administrative and non-material amendments to this Policy.

Version Number	Revision Date	Document Owner	Document Approver
v.2	1 August 2024	Company Secretary	Board of Directors
