

# Anti-Bribery and Anti-Corruption Policy



**Effective Date: 7 December 2021**

**Our aim is to act ethically, with integrity and in compliance with the law at all times.**

## **Our commitment**

We are committed to honesty and do not tolerate bribery or corruption.

## **Our approach**

We will not directly or indirectly use bribes to influence anyone – whether in the public or private sector and regardless of location - to use their discretion to benefit St Barbara.

## **Our principles**

We will:

1. be guided by St Barbara's Values;
2. complete St Barbara training and education sessions;
3. seek guidance when unsure;
4. comply with all applicable Anti-Bribery and Corruption laws, in addition to this Policy and St Barbara's Voluntary Contributions Policy, Code of Business Conduct and related measures;
5. maintain measures, including but not limited to registers, to prevent and detect potential misconduct and to support compliance; and
6. be alert for instances of corrupt conduct and report suspected or actual breaches.

We will not:

1. engage in corrupt or dishonest business practices;
2. offer or accept gifts or hospitality if this might impair objective judgement, improperly influence a decision or create a sense of obligation;
3. directly or indirectly use property or funds for any unlawful, unethical or improper purpose;
4. authorise, make, invite or accept (or permit others to) any bribe, facilitation payment or improper benefit to obtain, retain or improve business or a business advantage;
5. offer or give anything of value to a public official (or their representative or family member) to induce or reward them for acting improperly in the course of their public responsibilities; or
6. make any political donations, including contributions to political parties, politicians, elected officials, or candidates for public office in any country.

## **Responsibilities and accountabilities**

This is a policy of St Barbara Limited ("St Barbara") and its controlled entities (collectively, "St Barbara Group"). It applies to all directors, officers, representatives, employees, contractors, consultants and suppliers of each member of the St Barbara Group and to any other person or organisation acting for or on behalf of the St Barbara Group ("personnel").

This policy will be reviewed by the Board at least biannually and updated as required. The General Counsel and Company Secretary is responsible for ensuring that this policy is implemented.

## **Policy governance**

Policy Approver: Board  
Policy Owner: General Counsel and Company Secretary  
Review Cycle: Biannual

## **Material policy revisions**

Version	Approval Date	Effective Date	Details
6.0	7/12/2021	7/12/2021	Periodic review