

ACG Metals Limited

Dealing with Public Officials

7 April 2026

Introduction

ACG Metals Limited and its group companies (collectively "ACG Metals") is committed to conducting its business responsibly, with integrity and upholding the highest ethical standards. It is our policy to conduct all of our business in an honest and ethical manner.

This Policy is designed to protect you, and ACG Metals, from allegations of wrongdoing and ensure we all comply with the law and best practice in instances of dealing with public officials. It should be read and applied together with our wider set of compliance policies which provide further detail, guidance and instruction on relevant topics, in particular our Anti-Bribery and Corruption Policy and Gifts and hospitality Policy.

Scope

This Policy applies to all directors, officers and employees of ACG Metals, wherever located, as well any person or company acting on behalf of ACG Metals, whether as an associate, contractor, consultant, agent, or otherwise (together "Relevant Persons"). All Relevant Persons are expected to work together with us to uphold our commitment to doing business without compromising ethical standards.

We also expect the suppliers and third parties that we work with (but may not control or supervise) to abide by the same standards. We should lead by example and encourage them to adopt a similar approach.

Policy

The definition of a public official is far reaching and includes any person who:

- (a) holds a legislative, administrative or judicial position (elected or appointed) (i.e., governor of a region or a judge);
- (b) exercises a public function on behalf of a country or territory or for a public agency/enterprise ((i.e., a civil servant)); or
- (c) is an official agent of a public international organisation (i.e. United Nations or The Intergovernmental Forum on Mining, Minerals, Metals and Sustainable Development (IGF)).

Accordingly, public officials include members of the military or police force, politicians, and employees of state-owned entities such as transport companies or hospitals.

Dealing with public officials carries a higher risk of corruption or the perception of corruption. We must all, therefore, be especially careful when dealing with public officials. Relevant Persons must not directly or indirectly offer, promise or give something of value to a public official with the intention of influencing the recipient in their capacity as a public official in order to obtain or retain business or an advantage in business. It is not necessary for the public official to do or agree to do anything improper for it to amount to a bribe.

We must therefore be very careful to ensure that our interactions with public officials do not provide any advantage, incentive or reward for their past, present or future willingness to do or omit to do something or make a decision.

In certain jurisdictions, public officials may request small unofficial payments, known as facilitation or “grease” payments, to speed up governmental processes, like issuing permits, licenses, or other official documents. Grease payments, no matter how small, are a form of bribery. ACG does not permit the payment of grease payments.

However, we will not jeopardise the safety of Relevant Persons and if you consider your or another's personal safety to be threatened as a result of not complying with a request for a payment and there is no other way to safely remove yourself from the situation, we will not treat such a payment as a breach of this Policy. However, such payments must be recorded and reported to Head of Legal and Compliance as soon as possible, and within a maximum of 3 working days of them taking place. If relevant, these may then be reported to local authorities. As set out in our Charitable Donations and Sponsorship Policy we also do not make any political donations.

As set out in our Gifts and Hospitality policy, Relevant Persons can provide gifts and hospitality to public officials, but this must be pre-approved and meet the criteria detailed therein, including:

- It complies with all applicable laws and could not be capable of being regarded in any way as a bribe
- It constitutes a normal business courtesy (such as paying for a meal or shared taxi) and is not lavish or extravagant in the context
- It is recorded and approved in advance
- There is no intent or prospect of influencing decision-making or other conduct
- It is not part of a “quid-pro-quo” or reciprocal exchange agreement
- There is no intent of obtaining any improper or undue advantage
- It is not in the form of cash or cash equivalent (such as a voucher or gift card)

Monitoring and Reporting

ACG Metals is committed to open communication and encourages requests for guidance if you have questions about the appropriateness of interactions with public officials.

We will periodically review our policies and procedures to ensure their effectiveness. Relevant Persons are encouraged to report any concerns. You will not face any retaliation for raising concerns, even if the concern isn't substantiated, as long as you have not knowingly made a false report. Please see our Whistleblowing Policy for further details.

Accountability

We are each accountable for ensuring that we meet our commitment to good governance, ethics and compliance. We must all make sure that we read, understand and comply with this Policy and attend any relevant training that we are invited to.

The consequences of failing to adhere to this Policy are potentially significant.

This Policy supports our values and commitment to ethical business practices. Accordingly, all suspected breaches of this policy will be taken seriously and investigated. Depending on the severity of the breach, disciplinary action may result and consequences may range from a warning to termination of employment. If the breach involves a criminal offence we may pass relevant details to the police or relevant enforcement body.

This Policy does not form part of your terms and conditions of employment and can be amended at any time.

Contact Details

If you have any questions about this policy, please contact Head of Legal and Compliance.

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