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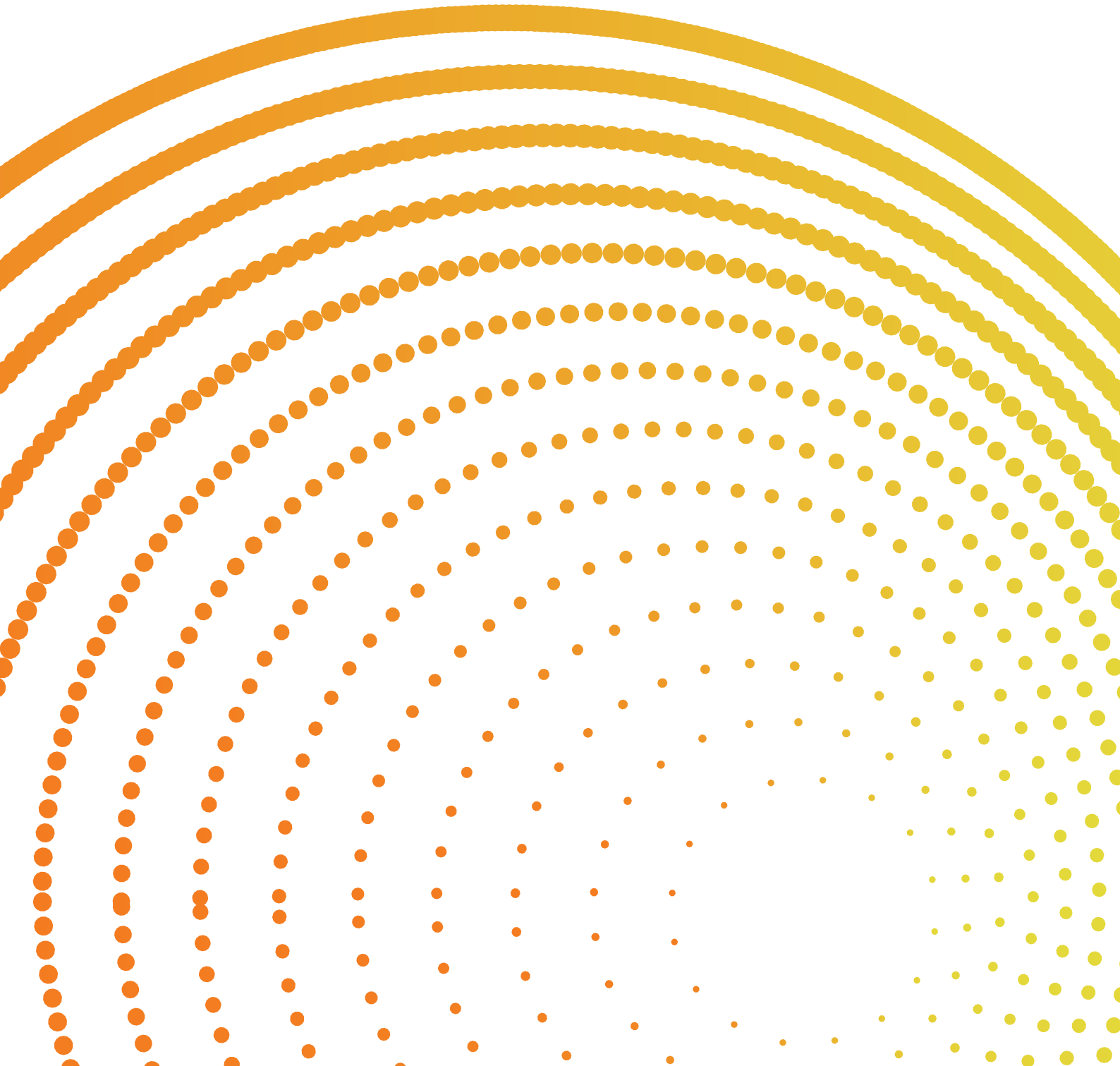
# Fraud and Corruption Policy 2022



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Molycop Legal

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## Fraud and Corruption Policy

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In this Fraud and Corruption Policy, Molycop (**this Policy**), Molycop means any company or business within the Molycop group of companies and businesses, including any other companies and businesses that may be acquired by or form part of the Molycop group from time to time.

In this Policy, **Molycop Personnel** means Molycop officers, employees, contractors, consultants, agents or any external parties acting or engaged to act on Molycop's behalf or family members of Molycop Personnel.

Molycop does not tolerate fraud, bribery or corruption of any kind, directly or through third parties, whether or not explicitly prohibited by this Policy or by law. This means that fraud, bribery or corruption committed by any Molycop Personnel will absolutely not be tolerated under any circumstances. If proven, the perpetrator(s) may face dismissal, civil legal action and criminal prosecution as appropriate.

Dishonest activity involving deception which results in actual or potential financial loss amounts to fraud. Dishonest activity involving a misuse of a position with Molycop to achieve personal gain for you or another person or entity amounts to corruption. Dishonest activity involving giving or offering anything of value in for the purpose of improperly obtaining or retaining a business advantage amounts to bribery.

Under this Policy, Molycop Personnel are not permitted to give or offer anything of value, directly or indirectly, to any Government Official<sup>1</sup> or any commercial party for the purpose of improperly obtaining or retaining a business advantage. "Anything of value" should be broadly interpreted to include cash, gifts to family members, forgiveness of a debt, loans, personal favors, entertainment, meals and travel, political and charitable contributions, business opportunities and medical care, among other items. Simply put, bribes, kickbacks or similar payments are never permitted, whether made to a Government Official or to customers, investors, clients or other private parties. Similarly, Molycop Personnel may not solicit or accept such payments or benefits from any party.

Molycop Personnel must conduct their activities in full compliance with the laws of the United States and all applicable anti-corruption laws, including the UK Bribery Act and the U.S. Foreign Corrupt Practices Act ("FCPA"). Molycop Personnel must conduct their activities in compliance with the Molycop Code of Conduct, which provides additional guidance on gifts, entertainment, hospitality, political activities, and conflicts of interest.

For additional information regarding relevant laws, key concepts, red flags, and case studies, please consult the Molycop Global Compliance Handbook.

Examples of fraudulent and/or corrupt activities can include:

- theft of physical (such as goods), financial (such as cash) and intellectual assets e.g. intellectual property (also known as IP), price information, sales margin, customer data etc.;
- obtaining gifts, property, a financial advantage or any other benefit by deception;
- causing a loss, concealing a liability you have to Molycop or creating an extra liability for Molycop by deception (e.g. concealing overpayments);
- knowingly providing false or misleading information to Molycop, or failing to provide information where there is an obligation to do so;



**Jim Anderson**

Chief Executive Officer  
August 2023

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<sup>1</sup> The term "Government Official" includes all officers or employees of a government department, agency or instrumentality; permitting agencies; customs officials; candidates for political office; and officials of public international organizations (e.g., the Red Cross). This term also includes officers or employees of government-owned or controlled commercial enterprises such as state-owned or controlled universities, airlines, oil companies, health care facilities or other vendors. The term also includes family members and close associates of such individuals (e.g., it is not permissible to give a lavish gift to the sibling, spouse or child of a government employee if a gift to the individual would be prohibited under this Policy).



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