



## ANTI-CORRUPTION & BRIBERY POLICY

### 1. Policy Statement

Horizon Gold Limited and its subsidiaries (together **Horizon Gold**) are committed to conducting business in accordance with all applicable laws, rules and regulations in all the jurisdictions in which Horizon Gold operates. It is Horizon Gold's policy to conduct all business in an honest and ethical manner.

Horizon Gold adopts a zero-tolerance approach to bribery and corruption. It is committed to acting professionally, fairly and with integrity in all business dealings and relationships wherever Horizon Gold operates and implementing and enforcing effective systems to counter bribery. It is committed to ensure that its corporate culture strongly discourages bribery and corruption, including foreign bribery.

### 2. Scope

Horizon Gold expects that all employees (whether permanent, fixed-term or temporary), officers, directors, contractors, intermediaries and company agents and representatives (collectively referred to as **Company Representatives**) will observe this policy (referred to as the **Policy**). This Policy may be amended at any time at the discretion of Horizon Gold and a copy of the amended policy will be communicated in writing to all Company Representatives.

Complying with this Policy is a condition of employment or contract. Breaches are considered a serious matter and may result in disciplinary action, including dismissal and reporting to appropriate authorities for further action.

Non-compliance with this Policy and international laws could also result in criminal consequences and penalties for both the individual involved and Horizon Gold.

### 3. Expectation

All Company Representatives are expected to perform and work with honesty and integrity and comply with all applicable laws in the course of employment or engagement with Horizon Gold, whether or not specifically covered by this Policy.

Company Representatives must ensure that they read, understand and comply with this Policy.

The prevention, detection and reporting of foreign bribery and other forms of corruption are the responsibility of all Company Representatives. Company Representatives are required to avoid any activity that might lead to, or suggest, a breach of this Policy.

Horizon Gold's culture of compliance and zero-tolerance approach to bribery and corruption must be communicated, where practicable in writing, to all third parties at the outset of our business relationship with them and as appropriate thereafter.

Company Representatives must notify the Managing Director as soon as possible if they believe or suspect that a breach of this policy has occurred, or may occur in the future.

### 4. Foreign Jurisdictions

In Australia, anti-corruption legislation (principally the Criminal Code Act 1995 (Cth) (the **Code**)) makes it illegal for companies, their officers, directors, employees and agents, and any shareholders acting on their behalf, to bribe foreign officials. The Code has extra-territorial operation which means that it applies to offences committed overseas by Australian citizens, residents and corporations, as well as offences committed in Australia.

Australia ratified the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions in 1999. In order to comply with the OECD Convention, Australia introduced a new offence into the Code: Division 70 (the offence of "bribing a foreign public official"). Although it is not the only applicable legislation which employees have to comply with, it is the principal legislation and the focus of Horizon Gold's Policy.

Horizon Gold may also be subject to the United States' Foreign Corrupt Practices Act 1977 (**FCPA**) which contain similar provisions.

Horizon Gold currently does not operate in any foreign jurisdictions. Should Horizon Gold intend to conduct any overseas operations or overseas transactions, Company Representatives must familiarise themselves with the Code and FCPA and ensure that they do not breach them.

## **5. Gifts and hospitality**

This Policy does not prohibit normal and appropriate gifts and hospitality (given and received) to or from third parties.

The giving or receipt of gifts is not prohibited, if the following requirements are met:

- a) it is not made with the intention of influencing a third party to obtain or retain business or a business advantage, or to reward the provision or retention of business or a business advantage, or in explicit or implicit exchange for favours or benefits;
- b) it complies with local law;
- c) it is given in Horizon Gold's name, not in the Company Representatives name;
- d) it does not include cash or a cash equivalent (such as gift certificates or vouchers);
  - I. it is appropriate in the circumstances;
  - II. taking into account the reason for the gift, it is of an appropriate type (cash, drugs or other controlled substances should not be given) and monetary value (excessive or expensive gifts should not be given) and given at an appropriate time (gifts should not be given during contract negotiations or the making of important business decisions);
  - III. it is given openly, not secretly; and
  - IV. gifts should not be offered to, or accepted from, foreign public officials or local government officials or representatives, or politicians or political parties, without the prior approval of the Managing Director.

Horizon Gold appreciates that the practice of giving business gifts varies between countries and regions and what may be normal and acceptable in one region may not be in another. The test to be applied is whether in all the circumstances the gift or hospitality is reasonable and justifiable. The intention behind the gift should always be considered.

If the Company Representatives has any doubt about whether a gift should be given or accepted, the question should be referred to the Managing Director (who can, if necessary, seek advice from Horizon Gold's lawyers).

## **6. Reporting a concern or complaint**

The Company Representatives are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. If they are unsure whether a particular act constitutes bribery or corruption, or if they have any other queries, these should be raised with the Managing Director.

The Company Representatives are entitled to anonymously report a concern or complaint to the Managing Director via writing, email or telephone. However, by their very nature, concerns or complaints submitted by email or telephone (as opposed to being submitted in writing) tend to be more difficult to keep anonymous and confidential.

All reports of alleged violations, concerns or complaints whether or not they were submitted anonymously, will be kept in strict confidence to the extent possible at law and consistent with Horizon Gold's need to conduct an adequate investigation.

If Company Representatives are not comfortable reporting a concern to the Managing Director, they should report the concern to any supervisor or member of management whom they are comfortable approaching. Any supervisor or manager who receives a report of an alleged violation, concern or complaint must immediately forward the report to the Managing Director.

Reports of alleged violations concerns or complaints should be factual, rather than speculative, and should contain as much specific detail as possible to allow for proper assessment. Any report or complaint should clearly set out all the information the individual knows about the alleged violation. In addition, it should contain sufficient corroborating information to support a decision whether or not to formally investigate.

#### **7. If you are a victim of bribery or corruption**

Company Representatives must tell the Managing Director as soon as possible if they are offered a bribe by a third party, are asked to make one, suspect that this may happen in the future, or believe that they are a victim of another form of unlawful activity.

#### **8. Company protection**

Workers and third parties who refuse to accept or offer a bribe, or those who raise concerns or report another's in accordance with this policy, are sometimes worried about possible repercussions. Horizon Gold aims to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

Horizon Gold is committed to ensuring no one suffers any retaliation or detrimental treatment as a result of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion that an actual or potential bribery or other corruption offence has taken place or may take place in the future. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that they have suffered any such treatment, they should tell Managing Director immediately.