



# HERITAGE MINERALS

## ANTI-CORRUPTION POLICY STATEMENT

### Heritage Minerals Is committed to:

Stopping corruption, which is the offering, promising, giving, accepting, or soliciting of an advantage as an inducement for action which is illegal or a breach of trust. Corruption is an inducement or reward offered, promised, or provided to gain any commercial, contractual, regulatory, or personal advantage.

Heritage Minerals anti-corruption policy is underpinned by the Heritage Minerals SOPs, namely but not limited to:

- Document control SOP
- Procurement SOP
- Human resource SOP
- Disciplinary SOP
- Record management SOP
- Supplier engagement SOP.

Senior management are committed to implementing and enforcing effective systems to prevent and eliminate corruption, in accordance with the Bribery Act 2010. Heritage Minerals benefits from carrying out business in a transparent and ethical way. Heritage Minerals does not tolerate any form of corruption, whether direct or indirect, by, or of, its workers, officers, and stakeholders.



### Heritage Minerals values:

- Honesty
- Integrity
- Legal, professional and policy compliance
- Ethical business practices
- Quality.

Facilitation payments tend to be demanded by low level officials to obtain a level of service which one would normally be entitled to. Facilitation payments are a form of corruption made for the purpose of expediting or facilitating the performance of an official for a routine action, and not to obtain or retain business or any improper business advantage. Heritage Minerals strict policy is that facilitation payments must not be paid. Heritage Minerals recognise, however, that Heritage Minerals workers may be faced with situations where there is a risk to the personal security of a worker or their family and where a facilitation payment is unavoidable, in which case the following steps must be taken:

- Keep any amount to the minimum
- Create a record concerning the payment on the anti-corruption claim form
- Report it to your supervisor immediately.

Workers and stakeholders acting on behalf of Heritage Minerals must note that corruption is a criminal offence that may result in up to 10 years' imprisonment and or an unlimited fine for the worker and an unlimited fine for Heritage Minerals. A breach of these Heritage Minerals requirements by workers must be treated as grounds for disciplinary action.

|  |   |  |
|--|---|--|
| <b>Heritage Minerals Representative:</b> | Malcolm Paterson  |  <b>HERITAGE<br/>MINERALS</b> |
| <b>Position:</b>                         | Chief Executive Officer (CEO)   |  |
| <b>Signature:</b>                        |  |  |
| <b>Date:</b>                             | 03/05/2023  |  |