



P16.2 Anti-Bribery and Corruption Policy

Metallica Minerals (Metallica), we are committed to conducting our operations and business activities with integrity and preventing bribery or corruption by any of its directors, officers, employees, or any other party acting on our behalf. Metallica is committed to complying with all laws that apply to it, including anti-bribery and corruption laws.

The purpose of this policy is to supplement the Code of Conduct. It includes but is not limited to:

- Bribery and corruption of any form are prohibited. Employees are not permitted to give, offer, promise, accept, request, or authorise a bribe, whether directly or indirectly
- Employees must declare and report gifts and or benefits either offered or accepted and valued over \$200 or more
- Donations to political parties is strictly prohibited
- Charitable donations must be legal and ethical under local laws and practices. Donations to charities must be approved by the board. Care must be taken to ensure charities are of an apolitical stance

Bribery and Corruption

A bribe is an offer of money or favours given or promised in order to influence the conduct or decisions of an employee of the company, or that of the company's clients, customers, service providers or other stakeholders. Bribes need not be of immediate monetary value but can include favours such as favourable treatment, meals, and invitations to events such as sports or entertainment.

Corruption includes dishonest or fraudulent conduct. We define corruption as the abuse of entrusted power or authority for private gain or to cause financial or reputational damage.

If an officer, employee, visitor or contractor identifies conduct that may be in breach of this policy, this is to be reported to management in a timely manner. Use of the Grievance Policy or Whistleblower Policy may also be appropriate in the circumstances.

If a breach of this policy is proven, then the person in breach may be subject to disciplinary action.

Our polices will be reviewed from time to time to ensure they remain adequate, encourage best practice, and drive our planning and continuous improvement processes.

Title	Date effective	Revision status	Set review	Planned review	Page
P16.2 Anti-Bribery and Corruption Policy	October 2023	1	2 years	October 2025	1 of 2



Theo Psaros
Executive Chairman
October 2023

Scott Waddell
Company Secretary
October 2023

Title	Date effective	Revision status	Set review	Planned review	Page
P16.2 Anti-Bribery and Corruption Policy	October 2023	1	2 years	October 2025	2 of 2