

ANTI-BRIBERY AND CORRUPTION POLICY

As a leading Australian mining services and resource development company, Mineral Resources Limited (MRL) is committed to acting with honesty and integrity and conducting its business in accordance with all applicable laws and regulations. MRL does not tolerate bribery or corruption¹ or any actions constituting fraud². Bribery and corruption adversely impact the business environment by undermining legitimate business activities. A breach of anti-bribery or anti-corruption laws is a serious offence that can severely damage MRL's reputation and result in criminal and civil penalties.

This Policy outlines MRL's commitment to fair and legal business practices, anti-bribery and corruption.

SCOPE

This Policy applies to all MRL Stakeholders, defined for this purpose as employees (including contractors and consultants) and Directors for all entities within the MRL Group.

OUR COMMITMENT

We commit to:

- ▶ Comply with all relevant anti-bribery and anti-corruption laws and regulations
- ▶ Uphold appropriate controls around political donations and offering or accepting gifts, entertainment or hospitality
- ▶ Educating our employees and stakeholders on the role they play in MRL's commitment to this Policy
- ▶ Prohibit any form of retaliation, discrimination, harassment or intimidation against any person reporting, in good faith, a breach or suspected breach, of this Policy.

We will not directly or indirectly:

- ▶ Offer, promise, pay, authorise, accept or request bribes of any form (including facilitation payments and secret commissions)
- ▶ Seek to improperly influence the decisions of a public official in any country
- ▶ Give or receive benefits, sponsored travel or inducement where the purpose of the provider is to improperly influence a decision or obtain an illegitimate commercial advantage
- ▶ Engage in any form of money laundering in connection with our business activities.

The acceptance of gifts, hospitality and entertainment has to be lawful, occasional, of moderate value, not done in return for business services, information or advantage.

Breaches of this Policy should be reported to your supervisor, manager or through the Mineral Resources confidential independent whistleblowing service, MinRes Integrity Assist, which provides an avenue for serious concerns to be reported. Details of this service are available at www.minresintegrity.deloitte.com.au

OUR GOALS

MRL will operate with integrity and honesty by adhering to our anti-bribery and corruption commitments.

¹ Corruption is defined in this policy as per [UN Global Compact Principle 10](#) as inclusive of extortion.

² Fraud encompassing of any dishonest or fraudulent act, embezzlement or misappropriation of funds, securities, supplies, or other assets

OUR RESPONSIBILITY

MRL will continue to take a proactive approach against bribery and corruption. Leaders at all levels within the MRL Group are required to adhere to this policy and to ensure that employees, contractors and visitors are involved in its ongoing implementation. MRL Stakeholders have a responsibility to comply with the principles of this Policy and any associated policies, procedures or processes. Breaching this policy may result in disciplinary action, dismissal or termination of employment.

RELATED DOCUMENTS

Document Name	Document Number
Code of Conduct and Business Integrity	MRL-HR-POL-0012-Code of Conduct
Supplier Code of Conduct	MRL-FI-POL-0016 Supplier Code of Conduct
Whistleblower Policy	MRL-FI-POL-0010 Group Whistleblower Policy
Whistleblower Procedure	MRL-FI-PRO-0020 Group Whistleblower Procedure

REVIEW OF POLICY

This Policy will be periodically reviewed, revised and re-published where necessary to ensure it remains relevant and appropriate to MRL's activities.



Derek Oelofse

Group Financial Controller and Company Secretary

31 August 2021