

Anti-bribery and Corruption Policy

1 Phoslock stands for transparency

Phoslock Environmental Technologies Limited (**Phoslock**) believes the use of resources or power for private gain has profoundly negative consequences.

Bribery and Corruption erode trust and inhibit positive economic development and can exacerbate environmental degradation, inequality, poverty and social cohesion.

We are committed to operating without any instances of Bribery or Corruption which go against our key values.

We require all our Personnel and Business Partners to comply with the standards in this policy in relation to any activity involving the Group anywhere in the world.

The meanings of certain capitalised words are explained later in this policy.

The standards in this policy are in addition to Phoslock's ethics policy or any other policy or code which cover the same or similar subject matter as this policy.

2 What you must not do

If you are covered by this policy, you must not:

- engage in Bribery, Facilitation Payments or Secret Commissions, except to avoid an immediate threat to your, or someone else's, safety;
- victimise anyone for not Engaging in Bribery, Facilitation Payments or Secret Commissions or for reporting under this policy;
- make political donations on behalf of Phoslock;
- make charitable or community donations or sponsorships that may be perceived as Bribes;
- offer, provide or accept Gifts, hospitality or travel in a manner contrary to this policy; or
- engage or pay a Business Partner knowing or suspecting they may do any of the prohibited conduct.

You must exercise particular care on these matters when Phoslock is starting new business ventures or investing in new companies or countries.

3 You need to report breaches

You must promptly report to Phoslock's CEO or CFO:

- any actual or suspected breaches of this policy that you become aware of;
- any Bribery, Facilitation Payments or Secret Commissions paid to avoid an immediate threat to your, or someone else's, safety; and
- any request or demand for something that would breach this policy, if it were provided.

Any reports will be logged and investigated and appropriate action will be taken. Reports will be considered confidential. The board of directors of Phoslock will be made aware of any material reports. If for any reason you are not comfortable reporting such conduct to the CEO or CFO, you can also report concerns pursuant to our whistleblower policy.

4 Who is covered by this policy?

This policy applies to:

- Phoslock and all subsidiary and affiliate companies over which it exercises control (**Group**); and
- all directors, officers, employees and individual contractors or consultants of the Group (**Personnel**); and
- any person or organisation providing or supplying goods or services or acting as agent for or on behalf of any member of the Group (**Business Partners**). Our Business Partners may include distributors, contractors, agents, advisors, consultants, suppliers and joint venture partners.

5 What is Bribery?

Bribery occurs when a person gives, offers or promises a benefit or something of value, either directly or indirectly, in order to obtain or retain a business advantage for the Group that is not legitimately due. Bribery also includes a request for, or receipt of, a bribe.

Bribes include monetary or non-monetary benefits and encompass Gifts, hospitality, entertainment, travel, donations, sponsorships, loans, reciprocal favours, business or employment opportunities, promotions and any other provision of favours of significant value.

When we say what you must not do, we mean all the ways you can **Engage** in an activity, including doing the activity, as well as offering to do, promising to do, requesting someone do or authorising the activity or causing someone else to do, offer to do, promise to do, request someone do or authorise the activity.

You must not Engage in Bribery, except to avoid an immediate threat to your own, or someone else's, safety.

6 What are Facilitation Payments?

Facilitation Payments are unofficial payments that are made with the intention to secure or expedite the performance by a public official of a routine governmental action.

Facilitation Payments are bribes.

You must not Engage in Facilitation Payments, except to avoid an immediate threat to your own, or someone else's, safety.

7 What are Secret Commissions?

Secret Commissions are when an agent accepts, requests or authorises a monetary or non-monetary benefit from a third party, without disclosing the benefit to their principal, in return for favouring that party in the course of their principal's business. **Secret Commissions are bribes.**

You must not Engage in Secret Commissions, except to avoid an immediate threat to your own, or someone else's, safety.

8 Guidelines for charitable donations

Charitable or community donations or sponsorships can be a disguise for a form of Bribery. For example, a donation to an organisation associated with a person who can make decisions affecting Phoslock.

You must not make charitable or community donations or sponsorships that may be perceived as Bribes.

All charitable or community donations made on behalf of Phoslock or other members of the Group must:

- be approved according to Phoslock's approval processes;
- be documented, with all records kept; and
- comply with local laws and practices.

9 Gifts, hospitality and travel

You may only provide or receive Gifts, hospitality or travel if they are:

- not cash, loans or cash equivalents;
- reasonable and modest value (when considered in isolation and in the context of other Gifts, hospitality or travel provided or received by the same counterparty);
- appropriate and consistent with reasonable business practice;
- provided only for the purpose of building or maintaining business relationships or normal courtesy, and never be offered for something in return or during a negotiation or tender process;
- not intended as, or could not be reasonably perceived as, an attempt to obtain a business or business advantage;
- provided in an open and transparent manner;
- not embarrassing to Phoslock or the counterparty or would not be, if disclosed; and
- permissible, and within the monetary limits and disclosure requirements, under relevant laws, regulations, rules or codes (including Phoslock policies).

Gifts, hospitality or travel must not be provided to, or received from, public or government officials or their associates, including politicians or political parties.

Gifts includes any gift, gratuity, favour, benefit, discount, forbearance, or other tangible or intangible item having monetary value for which the recipient does not pay fair market value. A gift also includes meals, drinks, entertainment and recreation (tickets, passes, etc.), services, training, transportation, discounts, promotional items, lodging, gift cards, door prizes or physical items (such as ‘free’ products, flowers, wine, tickets to events and the like).

All Gifts, hospitality or travel you provide or receive must be reported under Phoslock's usual procedures.

10 Consequences of breaches

Phoslock has a zero tolerance approach to breaches of this policy. A breach involving Phoslock may result in significant fines and damage to our reputation and standing in the community.

If you breach this policy, you may face:

- disciplinary action – including termination of your employment or contract with Phoslock; and
- criminal or civil liability – including time in jail and significant fines.

You must cooperate fully and openly with any investigation by Phoslock into any alleged or suspected breach of this policy. Failure to cooperate or to provide truthful information is a breach of this policy.

11 Reviewing our policy

Phoslock will review this policy and our associated procedures at least annually to ensure:

- our Personnel understand this policy and have sufficient training in relation to it;
- reports under this policy are appropriately recorded, investigated and responded to; and
- that the policy and procedures continue to operate effectively or require changes.