



Anti-Bribery & Anti-Corruption Policy

Abra Mining Pty Ltd (AMPL) is committed to conducting all of its business activities fairly, honestly, with integrity, and in compliance with all applicable laws, rules and regulations. AMPL is committed to preventing any form of corruption and bribery and to upholding all laws relevant to these issues, including the Anti-Corruption legislation. To support this commitment, AMPL has adopted this Anti-Bribery and Anti-Corruption Policy (ABC Policy) to ensure that it has effective procedures in place to prevent any corruption and bribery.

This policy should also be considered in reference to the Galena Mining Limited, Corporate Governance Plan Policies (Schedule 11 – Anti-Bribery and Anti-Corruption Policy).

This ABC Policy applies globally. To the extent that local laws, codes of conduct or other regulations (Local Laws) in any countries are more rigorous or restrictive than this ABC Policy, those local laws should be followed by any subsidiary operating in that country. Where a country has specific bribery and corruption laws which are less rigorous than this ABC Policy, this ABC Policy prevails. If required, AMPL may, from time to time, provide country-specific directions for subsidiaries operating in countries outside of Australia.

This ABC Policy sets out AMPL's requirements in relation to interactions with officials and third parties. This ABC Policy does not prohibit interactions with officials, rather it forbids corrupt interactions with those individuals.

AMPL personnel must understand and comply with this ABC policy. Personnel must not,

- 1) engage in bribery or any other form of corruption or improper conduct;
- 2) make any facilitation payments;
- 3) offer, pay, solicit, or accept secret commissions;
- 4) engage in money laundering;
- 5) give or accept items of value where to do so might influence objective business judgement; or
- 6) obtain required approvals for political contributions and charitable donations.

AMPL personnel are required to maintain accurate records of dealings with third parties and report any suspicious behaviour relating to this ABC policy.

The ABC Policy does not prohibit the giving of normal and appropriate hospitality to, or receiving it from, third parties.

Anthony (Tony) James
Managing Director & CEO

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