



## Anti-Bribery Policy

**At Kenmare, our actions are informed by our guiding principles: we care, we grow, we excel. Kenmare is committed to operating in an ethical and honest manner. We have zero-tolerance for bribery and corrupt activities, and we believe in acting professionally, fairly, and with integrity in all business dealings and relationships.**

Bribery is a criminal offence in Ireland, Mozambique, the UK and in other jurisdictions around the world and is strictly prohibited by Kenmare. Bribery refers to the act of offering, giving, promising, asking, agreeing, receiving, accepting, or soliciting something of value or of an advantage so to induce or influence an action or decision. The amount of the bribe is irrelevant, it is the intention which makes giving or receiving the bribe an offence.

A bribe refers to any inducement, reward, or object/item of value offered to another individual in order to gain commercial, contractual, regulatory, or personal advantage. Bribery is not limited to the act of offering a bribe. If an individual is on the receiving end of a bribe and they accept it, they are also breaking the law.

Kenmare has implemented detailed anti-bribery rules and guidance for its employees. In line with our anti-bribery commitment, Kenmare will:

- Ensure that all employees understand that they must never pay, offer, accept, agree to accept, ask for or facilitate bribes. Kenmare employees must also never authorise nor allow any third-party service providers (such as contractors or suppliers) to pay bribes on Kenmare's behalf.
- Ensure that all employees understand that they must never pay or permit third parties to pay "facilitation payments", which are defined as a form of bribery that involves expediting or facilitating the performance of a public official for a routine governmental action.
- Require employees to seek advice from their manager if they are uncertain about whether something is a bribe or a gift or act of hospitality.
- Require employees to report any bribes, suspicions of bribes or requests for bribes to their manager as soon as they become aware of them. This includes bribes or suspicions in connection with payments by third parties (e.g. contractors working on Kenmare's behalf).

- Require employees to be responsible in giving and accepting gifts, entertainment and financial contributions, in line with Kenmare Group standards and procedures. For more information, employees should see Kenmare’s Business Ethics Policy.
- Require employees to avoid conflicts of interest with the interest of Kenmare, its third-party service providers or other stakeholders. Conflicts of interest are situations in which an individual has competing interests, financial or otherwise, and serving one interest could involve working against the other interest.
- Consider bribery and corruption risks as part of its selection of third-party service providers (including contractors and suppliers)
- Not give donations or contributions to any political party or make campaign contributions
- Provide training on anti-bribery and business ethics as part of the induction process for all new employees, including management. Employees will also receive regular, relevant training on how to adhere to all relevant policies and guidance in this regard.

Kenmare will ensure that all employees understand and adhere to this Anti-Bribery Policy. We will also provide third-party service providers (including contractors and suppliers) with this Anti-Bribery Policy and we will ask them to adhere to it.

The Anti-Bribery Policy is implemented by members of the Executive Committee and site leadership. The Audit & Risk Committee, and more widely the Board of Directors, has responsibility for overseeing company-wide compliance to the Anti-Bribery Policy.

This policy was reviewed and approved by the Board of Kenmare Resources plc and is signed by Michael Carvill, Managing Director on behalf of the Board of Kenmare Resources plc.

**Michael Carvill**

Managing Director

10 December 2021

**About Kenmare and scope of policy**

Kenmare is an established mining company operating the Moma Titanium Minerals Mine on the north-east coast of Mozambique. This Policy covers the Mine, our Mozambican offices in Nampula and Maputo and our head office in Dublin, Ireland.

We are one of the world's largest producers of mineral sands products, key raw materials ultimately consumed in everyday "quality-of-life" items such as paints, plastics, and ceramic tiles. We mine titanium-rich sands, mainly using dredges that float in artificial ponds, removing 3-5% of ore mined, and separate it into its constituent minerals. We then progressively rehabilitate the mined land before it is handed back to the local community. Once the minerals are separated, we transport our final products to ocean-going vessels from our dedicated port facility.

## Document revision control

Version number	Page number	Change effected	Date of issue
V1.0	All pages	First version	11 March 2020
V1.1	2	Added MD signature & company description	25 November 2021
V1.2	3	Amended company description	10 December 2021