



ANTI-BRIBERY AND CORRUPTION POLICY

LGL-031 V2.0

Adopted by the Board: 26 August 2021

Last Review Date: 16 September 2022

TITOMIC

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Privileged & Confidential Information

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PURPOSE

Titomic Limited (ACN 602 793 644) (**us, we, our**) is committed to conduct business ethically and with integrity both in Australia and overseas while maintaining a high standard of investor confidence and good corporate governance. (**Anti-Bribery and Corruption Policy**).

This Anti-Bribery and Corruption Policy details how we deliver on our values of integrity collaboration and innovation through honest, ethical, and respectful engagement.

Titomic's purpose regarding the management of gifts and benefits is to protect reputations and minimises potential negative consequences for you and Titomic.

Under the Policy you must:

- not give or accept gifts and/or benefits that will compromise, or appear to compromise, your integrity and objectivity in performing your duties
- not give or accept gifts and/or benefits that cause, or appear to cause a conflict of interest
- record gifts or benefits worth \$100 or more in the Gift and Entertainment Register
- record in the Gift and Entertainment Register where a gift or benefit provided on behalf of Titomic is in excess of \$100
- decline gifts and/or benefits worth \$100 or more (unless an exception applies)

The Policy also applies globally. If travelling outside of Australia, Titomic employees are subject to the laws of the country they are in; however, the principles of this Policy must be followed regardless of whether or not that country has specific bribery and corruption laws. Where a country has specific bribery and corruption laws which are of a lesser standard to this Policy, this Policy prevails.

TITOMIC SAYS 'NO' TO ALL FORMS OF BRIBERY AND CORRUPTION.

AT TITOMIC WE:

- conduct all business in an honest and ethical manner;
- are committed to acting professionally, fairly and with integrity in all business dealings and relationships;
- do not permit the making of any inappropriate promises, gifts, or excessive hospitality to Foreign Public Officials in order to achieve unfair advantage or benefit; and
- resist any efforts made by others (including suppliers, customers, or clients) to unfairly affect any official decision-making process in order to achieve unfair advantage or benefit.

TITOMIC'S EMPLOYEES AND AGENTS MUST:

- conduct all business in an honest and ethical manner.
- be committed to acting professionally, fairly and with integrity in all business dealings and relationships;
- not permit the making of any inappropriate promises, gifts, or excessive hospitality to Foreign Public Officials in order to achieve unfair advantage or benefit; and
- resist any efforts made by others (including existing or potential suppliers, customers or clients) to unfairly affect any official decision-making process in order to achieve unfair advantage or benefit.

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We encourage charitable donations/sponsorships only when they are ethical and legal under local laws and practices. We do not encourage contributions to political parties.

We avoid facilitation payments as a means of doing business. We expect our business partners and Agents to implement and enforce effective systems to counter bribery.

We will always report and document any breach of the law that is brought to our attention through the reporting mechanism provided by Australian authorities.