

## Anti-Bribery and Corruption Policy

Hastings Technology Metals Ltd (Hastings or the Company) is a leading rare earths mining company in Western Australia, is dedicated to conducting all business in an honest and ethical manner and takes a zero-tolerance approach to bribery and corruption. Hastings is committed to acting professionally, fairly and with integrity in all business dealings and relationships wherever we operate. As part of this commitment, Hastings does not tolerate any form of bribery or corruption in its business dealings. Hastings commits to prohibition of bribery and corruption by:

- Ensuring all Hastings parties understand they must avoid any activity that might lead to bribery, corruption, or a conflict of interest
- Ensuring Hastings parties do not provide money or anything else of value, no matter how small, to any government or public official to influence them in their official or personal capacity in Australia or overseas
- Ensuring the prevention, detection and reporting of any bribery or other forms of corruption observed is the responsibility of all those working for, or on behalf of, Hastings
- Identifying and mitigating bribery and other corruption risks
- Fostering a culture of notifying management as soon as individuals believe or suspect bribery, or corruption has occurred or may occur in the future, or consider they are a victim of another form of unlawful activity
- Compliance with anti-bribery and corruption laws
- Ensuring that anyone who raises a genuine concern in good faith in accordance with this policy will be supported, even if it is subsequently determined they were mistaken
- Maintaining transparency and keeping records of gifts, political donations, conflicts of interest, charitable donations, sponsorships, and corporate expenses, including gifts, hospitality and other benefits in dealings with third parties
- Providing guidelines for the implementation of this policy
- Hastings' zero tolerance approach to bribery and corruption will be communicated to all Hastings stakeholders, suppliers, and business partners.

This Policy applies to all Hastings parties including directors, officers, employees (whether permanent, fixed-term or temporary), contractors, consultants, and agents working for or on behalf of Hastings, whether in Australia or overseas. This policy should be read alongside all Hastings policies including the Code of Ethical Business Conduct and Whistleblower Policy.



Charles Lew

**EXECUTIVE CHAIRMAN**

Approved by the Board (23 June 2022)