

## **ANTI-BRIBERY AND ANTI-CORRUPTION CODE OF CONDUCT**

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Pacific Mining Parts also known collectively PMP Group (the Company) is committed to conducting its business activities with the highest standards of integrity and in full compliance with all applicable anti-bribery and anti-corruption laws and regulations in all jurisdictions it operates in. The Company strictly prohibits any form of bribery or corruption, which refers to the offering, giving, receiving, or soliciting of any improper advantages to or from any individual, government entity, or business associate to gain an improper business advantage. The Company recognises the importance of upholding its legal and ethical obligations and maintaining the trust of its stakeholders.

### **SCOPE**

This policy sets forth the minimum expected standards for all entities under the governance of the PMP Group, encompassing their employees, contractors, and stakeholders across all operational locations. In jurisdictions where applicable laws prevail, they supersede the PMP Group Policy.

### **ANTI-BRIBERY AND ANTI-CORRUPTION COMPLIANCE POLICY**

The Company is dedicated to complying with all relevant anti-bribery and anti-corruption laws, regulations, and reporting requirements in all jurisdictions where it operates. The Company will implement measures to prevent bribery and corruption, including appropriate due diligence, internal controls, and third-party risk management procedures.

### **COMPLIANCE AND REPORTING PROCEDURES**

Directors, employees, and stakeholders are expected to promptly report any suspected or observed acts of bribery or corruption within the organisation. Reports of suspected bribery or corruption can be made to the relevant Country Director, or by emailing [complaints@pmpgroup.io](mailto:complaints@pmpgroup.io). Failure to report such an incident constitutes a violation of this Policy and could lead to disciplinary action. The Company will protect the identity of individuals reporting bribery or corruption to the fullest extent permitted by law and ensure there is no retaliation against whistleblowers.

### **INTERNAL CONTROLS AND RISK MANAGEMENT**

The Company will establish and maintain effective internal controls to prevent bribery and corruption and ensure compliance with anti-bribery and anti-corruption regulations. A risk assessment will be conducted to identify potential areas of non-compliance or exposure to bribery and corruption risks. The Company will implement appropriate controls and procedures to mitigate identified risks and monitor their effectiveness.

### **THIRD-PARTY DUE DILIGENCE**

The Company will conduct appropriate due diligence on third parties, including suppliers, contractors, agents, consultants, and business partners, to assess their integrity and ensure they adhere to anti-bribery and anti-corruption standards. The Company will enter into written agreements with third parties that reflect compliance with applicable laws and regulations and include anti-bribery and anti-corruption provisions.

### **TRAINING AND AWARENESS**

The Company will provide regular training and awareness programs to relevant employees on anti-bribery and anti-corruption compliance. The training will cover topics such as recognising and preventing bribery and corruption, understanding applicable laws and regulations, and the consequences of non-

compliance. Employees involved in roles or responsibilities related to bribery and corruption risk will receive specific training on relevant laws, regulations, and reporting requirements.

### COMPLIANCE WITH LAWS AND REGULATIONS

The Company is committed to complying with all applicable anti-bribery and anti-corruption laws, regulations, and reporting requirements in each jurisdiction it operates, where applicable laws prevail, they supersede the PMP Group Policy. The Company will monitor changes in anti-bribery and anti-corruption laws and regulations and update its policies and procedures accordingly to ensure ongoing compliance with anti-bribery and anti-corruption measures.

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Duncan Scott



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