

Anti-bribery and Corruption Policy

Adopted December 2019

1. PURPOSE

HGL is committed to complying with the laws and regulations and acting in an ethical manner, consistent with the principles of honesty, integrity, fairness and respect. Bribery and the related improper conduct referred to in this policy are serious criminal offences for both the company and any individuals involved.

The purpose of this policy is to:

- (a) Set out the responsibilities of HGL personnel in observing and upholding the prohibition on bribery and related improper conduct; and
- (b) Provide information and guidance on how to recognise and deal with instances of bribery and corruption

2. WHAT IS BRIBERY AND CORRUPTION?

Bribery is the offering, promising, giving, accepting or soliciting of an advantage as an inducement for action which is illegal, unethical or a breach of trust. A bribe is an inducement or reward offered, promised or provided in order to give a commercial, contractual, regulatory or personal advantage and can take the form of gifts, loans, fees, rewards or other advantages.

Corruption is the abuse of entrusted power for private gain.

3. POLICY APPLICATION

This policy applies to all directors and employees of HGL. All employees are required to avoid any activity that might lead to or suggest a breach of this policy.

4. POLICY

HGL personnel must:

- (a) Understand and comply with this policy;
- (b) Not give, offer, accept or request bribes, facilitation payments, secret commissions or other prohibited payments or engage in money laundering or cause any of them to be given, offered, accepted or requested;
- (c) Obtain required approvals for donations and sponsorships,
- (d) Maintain accurate records of dealings with third parties; and
- (e) Be vigilant and report any breaches of, or suspicious behaviour related to this policy.

5. REPORTING/RAISING A CONCERN

All HGL employees have a responsibility to help detect, prevent and report instances of bribery and corruption as well as any other suspicious activity or wrongdoing in connection with HGL day to day operations and business activities. If you are unsure whether a particular act constitutes bribery or corruption, or if you have any other queries or concerns these should be raised with your manager and/or compliance officer.

If you are not comfortable, for any reason, with speaking directly to your manager, HGL has a whistleblower policy which affords certain protections against reprisal, harassment or demotion for making the report.

6. AMENDMENT OF THIS POLICY

This policy cannot be amended without approval from the HGL Board. It will be reviewed from time to time to ensure that it remains effective and meets best practice standards and the needs of HGL.