

ANTI-CORRUPTION & COMPLIANCE

STANDARD

This Standard provides a framework for Sundance Resources Limited (“**Sundance**”) activities and transactions to ensure that dealings will be open, transparent, honest and adhere to Sundance Policies and Standards, as well as relevant Anti-Corruption legislation and law.

EXPECTATIONS

- Sundance respects the privacy of its employees and contractors. However, all employees and contractor’s activities and actions (either in personal time or during work) shall not compromise or appear to compromise Sundance’s Code of Conduct.
- Sundance personnel must not commit, or be a party to, or be involved in bribery or corruption.
- Sundance personnel cannot, directly or indirectly, offer, promise, give, demand or accept any bribe or other undue advantage in order to obtain, retain or direct business or secure any other improper advantage in the conduct of business. This applies whether dealing with government or with private individuals or enterprises.
- Facilitation payments (direct or indirect), regardless of value, are to be as approved by the Sundance CEO.
- Payments to protect personnel from imminent danger are permitted, but must be formally recorded and investigated subsequent to the event.
- Gifts, entertainment, travel and per diem reimbursements must not be given or received as a reward or encouragement for preferential treatment.
- Sundance shall not participate in politics. It does not make payments to political parties or individual politicians other than in accordance with this Standard. Employees participating in political processes must not present themselves as if they are representing Sundance.
- Sundance does not make charitable donations or sponsorships that could be perceived as bribes or payments to gain an improper business advantage.
- Everyone at Sundance has a responsibility to report violations of this Standard.
- Sundance will investigate all suspected violations of this Standard and the CEO will be informed of all suspected violations and the conduct and finding of all investigations.
- Employees in breach of this Standard will be subject to internal disciplinary action, and may also be subject to Civil or Criminal Penalties.
- Misreporting and concealment in the accounting records of bribery and other improper acts is expressly prohibited.
- Use of 3rd Party agents, consultants and other intermediaries to circumvent the requirements of this Standard is expressly prohibited.
- Management of Sundance will support all employees to be compliant with this Standard. This shall include that each Department Manager will establish and enforce appropriate systems to ensure that all employees and contractors are (on engagement and annually) provided with robust overview of Sundance’s expectations in regard to Anti-Corruption (and the broader Code of Conduct requirements).
- If this Standard differs from local law, compliance will be with whichever is more stringent.

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