



## LARUS ENERGY - ANTI-BRIBARY AND CORRUPTION (ABC) POLICY

### Purpose

This Anti-Bribery and Corruption (ABC) Policy establishes Larus Energy Limited and its affiliates and subsidiaries (Larus Energy), commitment to conducting business ethically and in full compliance with Australian and relevant foreign bribery and corruption laws, including, but not limited to:

- Australian Criminal Code Act 1995, materially amended in 2024
- Australian Corporations Act 2001
- UK Bribery Act 2010
- US Foreign Corrupt Practices Act (FCPA) 1977
- UN Convention Against Corruption 2003
- PNG Act

. The purpose of this Policy is:

- Define prohibited conduct;
- Provide guidance on recognising and preventing bribery and corruption;
- Set procedures for reporting and addressing incidents;
- Minimise business, legal, and reputational risks.

### Scope

This Policy applies to:

- All employees, officers, directors, and contractors;
- All subsidiaries under the control of Larus Energy Limited
- All third parties acting on behalf of the company, including agents, distributors, consultants, and partners, both in Australia and abroad.

### Definitions

Definitions shall expand to include relevant definitions as stated in relevant Australian and International Legislation that may apply but will generally reflect the following meanings:

**Bribery:** Offering, giving, promising, accepting, or soliciting any benefit intended to improperly influence a person to obtain or retain an advantage.

**Corruption:** Misuse of position or authority for personal or business gain, including improper influence over public officials.

**Facilitation Payments:** Payments made to expedite routine actions (prohibited under this Policy).

**Agent/Third Party:** Any external entity or individual engaged to act on the company's behalf, including suppliers and subcontractors.

**Public Official:** Employees or officers of any government body or public international organisation, including their relatives or associates.

**Gift/Hospitality:** Any item, service, or entertainment offered or received in the course of business.



## **Policy Statement**

Larus Energy has zero tolerance for bribery and corruption.

Compliance with all applicable laws is mandatory in all jurisdictions where the company operates.

All Personnel must avoid any activity that may create or appear to create improper influence or conflict of interest.

## **Prohibited Conduct**

Personnel must NOT:

- Offer, solicit, or accept bribes or facilitation payments;
- Provide gifts, hospitality, or donations intended to exert improper influence;
- Engage in secret commissions, kickbacks, or any form of unethical inducement;
- Falsify records to conceal corrupt practices;
- Authorise or ignore suspected bribery or corruption.

## **Gifts, Hospitality, and Donations**

Gifts and hospitality of nominal value [e.g., under USD \$250] may be offered or accepted if:

- They do not seek to influence business decisions;
- They are lawful, transparent, and approved by senior management if exceeding set thresholds;
- Documented in a Gifts and Hospitality Register.

Charitable donations require prior written approval and due diligence to ensure no bribery or inappropriate influence is involved.

## **Third-Party Due Diligence**

Ensure third parties understand and commit to this Policy.

Monitor high-risk relationships regularly for compliance.

## **Risk Assessment**

Identify locations, industries, or transactions with elevated bribery or corruption risks.

Maintain a risk register and periodically update risk profiles.

Implement proportional risk mitigation measures based on assessment outcomes.

## **Training and Communication**

All employees and relevant third parties will be provided with a copy of this policy and will be required to acknowledge receipt, understanding and commitment to comply.

The Company will consider appropriate levels of training according to the evolution of the business.

The Policy will be further communicated and reinforced through corporate and leadership messaging, the intranet / internet and through third party contracting activities.



## Reporting and Whistleblower Protections

Employees, Contractors and Agents must report suspected or actual bribery or corruption immediately through designated channels:

Email: [admin@larusenergy.com.au](mailto:admin@larusenergy.com.au)

Directly to senior management or the Board.

Whistleblowers reporting in good faith will be protected from retaliation and guaranteed confidentiality.

## Record-Keeping and Audits

Maintain accurate and transparent books, records, and communications.

Implement internal controls, audits, and reviews to ensure compliance with this Policy.

Non-compliance or irregularities must be promptly investigated and remedied.

## Enforcement and Consequences

Violations may result in disciplinary action, termination, and/or civil or criminal penalties under Australian or relevant International law.

The Board and Senior Management is responsible for enforcing the Policy and taking corrective actions as necessary.

## Review and Update

This Policy will be reviewed annually and updated as required to reflect legislative changes, industry practices, or organisational or business environment changes.

## Appendices (Optional):

- Gifts, Hospitality & Donations Approval Form;
- ABC Risk Register Template;
- Whistleblower Reporting Guidelines.


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## Reviewed and Acknowledged :

Name: Richard Gazal

Position: Chairman

Date:

Signature: \_\_\_\_\_

Name: John Chambers

Position: Managing Director

Date:

Signature: \_\_\_\_\_