

### 1. PURPOSE AND SCOPE

The **New Hope Group**<sup>1</sup> is committed to the highest standards of conduct and ethical behaviour in all of our business activities.

We have zero tolerance for bribery and corruption and expect the same standard from our personnel and business associates.

### 2. WHO THIS POLICY APPLIES TO

This policy applies to any director, officer or employee of the New Hope Group as well as any agent or other person who performs a role as a representative of the New Hope Group (**New Hope Personnel**).

Where indicated, this policy also applies to our suppliers and contractors (including prospective suppliers or contractors invited into a tender process) and joint venture and other business partners (**Business Associates**).

### 3. PROHIBITED CONDUCT

New Hope Personnel must not:

- (a) Give or offer to give money or other benefit<sup>2</sup> to any individual, company, Government Official<sup>3</sup> or Foreign Public Official<sup>4</sup> to secure a business advantage or improper benefit or to exert influence on any person to act improperly in the performance of his or her duties or functions;
- (b) Receive or accept money or other benefit from any individual or company as an inducement to act improperly in the performance of their duties or functions (including to provide a business advantage or an improper benefit); or

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<sup>1</sup> **New Hope Group** includes New Hope Corporation Limited and its subsidiary companies, and may be referred to as **New Hope, we, our** or **us** in this policy.

<sup>2</sup> Including (for example) monetary gratuities, information, favours, material gifts, educational expenses, travel, entertainment, investment offers, transport services and employment offers.

<sup>3</sup> **Government Official** includes: any person engaged in public duty in a government agency; any political party, officer, or candidate; an officer or employee of a government-owned or government-controlled entity; and any person acting in an official capacity for a government, government agency or government-controlled entity.

<sup>4</sup> **Foreign Public Official** includes: an employee or official of a foreign government; a member of the executive judiciary or magistracy of a foreign country; a person who performs official duties under a foreign law; an officer or member of the legislature of a foreign country; or an employee or official of a public international organisation such as the United Nations

(c) Ask another person to offer, promise or give a bribe or benefit

Without limiting the above, a breach of any state or federal law relating to bribery or corruption is prohibited conduct under this policy.

## 4. GIFTS AND DONATIONS

The New Hope Group Code of Conduct places controls upon the giving and receiving of gifts by New Hope Personnel, including requirements to report any gifts received and to obtain formal approval for gifts over a threshold amount. The giving or receiving of gifts, rewards, or benefits by New Hope Personnel in breach of the Code of Conduct will be deemed to be a breach of this policy.

New Hope Personnel must not make or commit to make any political donation on behalf of the New Hope Group except with the authority of the New Hope Corporation Limited Board. As at the date of this policy, the Board has not delegated its authority to make any political donations except (in very narrow circumstances) to the CEO.

## 5. APPLICATION TO BUSINESS ASSOCIATES

We expect our Business Associates to share the commitments made in this policy and to comply with the anti-bribery and corruption laws of Australia and (where applicable) of the other jurisdictions in which they operate.

A breach of anti-bribery laws by a Business Associate which occurs in connection with activities performed for or in association with the New Hope Group will be a breach of this policy.

## 6. BREACHES AND RESPONSIBILITY

Breaches of anti-corruption laws can have serious consequences for both the New Hope Group and for the person who engages in such conduct. Severe civil and criminal penalties can apply in Australia and other jurisdictions.

Violation of any prohibition in this policy by New Hope Group officers or employees will result in disciplinary action which may include termination of employment.

Violation of any prohibition in this policy by other New Hope Personnel or Business Associates will (to the maximum extent permitted by law and the terms of the relevant contract) be grounds for immediate termination of any contract between a New Hope Group entity and the person who committed the violation.

The New Hope Corporation Limited Board expects to be informed of any suspected bribery or corruption occurring in connection with the New Hope Group. New Hope Personnel and Business Associates may raise concerns in accordance with the Speak Up (Whistleblower) Policy which is available on the New Hope Group website.

If the behaviour involves corruption or bribery of a Government Official or Foreign Public Official, the conduct may also be reported directly to the Australian Federal Police.

Any questions regarding this policy should be directed to the New Hope Corporation Limited Company Secretary.

## 7. REVIEW OF THIS POLICY

The New Hope Corporation Limited Company Secretary will review this policy at least annually to ensure it remains relevant, current, and compliant with all applicable laws.