

## **CORNISH LITHIUM PLC ANTI-BRIBERY POLICY**

### **INTRODUCTION**

Cornish Lithium Plc (**CLP**) is an innovative critical minerals company focused on the environmentally responsible extract of lithium from Cornwall. CLP is committed to conducting business with honesty and integrity. CLP is a parent company and references to CLP in this policy extend to each subsidiary of and entity within the CLP group.

### **PURPOSE AND SCOPE**

This policy sets out CLP's approach to bribery and corruption (**Policy**).

### **DEFINITIONS**

None

### **RELATED DOCUMENTS**

- Disciplinary Policy HR POL
- Whistleblower Policy LEG POL
- Grievance Procedure (which can be found in the Employee Handbook)

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### **1 INTRODUCTION**

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This policy sets out CLP's approach to bribery and corruption (**Policy**). This Policy applies to and is to be adopted by all employees, officers, directors, contractors and suppliers. Although this Policy is non-contractual and CLP may make changes to it from time to time, CLP expect everyone to comply at all times with the principles in this Policy and people will be held accountable for their behaviour in relation to this code. Action will be taken where this Policy is not followed and consequences are to be determined by the specific circumstances but may range from a warning to dismissal or to cancellation of a contract.

Senior management will monitor and review this Policy on a regular basis. The Board will make formal review of this Policy on no less than an annual basis and implement any updates accordingly.

### **2 OFFENCES**

Bribery is, in the conduct of CLP's business, the offering or accepting of any gift, loan, payment, reward or advantage for personal gain as an encouragement to do something which is dishonest, illegal or a breach of trust.

Bribery is a criminal offence. CLP prohibits any form of bribery. CLP require compliance, from everyone connected with CLP's business, with the highest ethical standards and anti-bribery laws applicable. Integrity and transparency are of utmost importance to CLP and have a zero-tolerance attitude towards corrupt activities of any kind, whether committed by CLP employees or by third parties acting for or on behalf of CLP.

It is a criminal offence to:

- offer a bribe;
- accept a bribe;
- bribe a foreign official; and
- as a commercial organisation, to fail to prevent a bribe.

You should be aware that if you are found guilty by a court of committing bribery, you could face up to 10 years in prison and/or an unlimited fine. CLP could also face prosecution and be liable to pay a fine.

### **3 PURPOSE**

The purpose of this Policy is to convey to all CLP employees, contractors, agency workers, suppliers, consultants and other business partners CLP's rules in relation to our unequivocal stance towards the eradication of bribery and our commitment to ensuring that CLP conducts its business in a fair, professional and legal manner. This Policy applies to all persons working for CLP or on our behalf in any capacity, including employees at all levels, directors, officers,

agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners, sponsors, or any other person associated with us, wherever located. This Policy does not form part of any employee's contract of employment.

A whistleblower is a person who raises a genuine concern relating to any of the above. If you have any genuine concerns related to suspected wrongdoing or danger affecting any of our activities (a whistleblowing concern) you should report it under this Policy or CLP's Whistleblower Policy.

This Policy should not be used for complaints relating to your own personal circumstances, such as the way you have been treated at work. In such cases you should use the Grievance Procedure.

If you are uncertain whether something is within the scope of this Policy you should seek advice from CLP's Chairperson.

#### **4 DEFINITIONS AND EXAMPLES OF BRIBERY AND CORRUPTION**

Corruption is the misuse of office or power for private gain. Bribery is a form of corruption which means in the course of business:

1. giving or receiving money, gifts, meals, entertainment or anything else of value;
2. as an inducement to a person to do something which is dishonest or illegal.

Common examples of bribery include:

- cash or other forms of payment that is used to secure a contract or obtain a licence;
- improper donations to political parties or related organisations;
- excessive gifts or entertainment intended to influence the recipient to undertake a particular course of action.

For the purpose of this Policy, a bribe may consist of anything of material value, not simply a payment of cash, and may include the provision or receipt of:

- lavish or disproportionate gifts and entertainment;
- donations with an ulterior motive;
- payment of travel expenses or accommodation for a customer or official when there is no underlying business purpose for a trip;
- use of corporate assets for activities which are unrelated to our business or approved charitable purposes.

#### **5 SCOPE**

This Policy applies to all CLP's employees, regardless of seniority or site. It also extends to anyone working for or on CLP behalf e.g., those engaged by us on a self-employed basis or an agency arrangement.

## **6 POLICY**

It is prohibited, directly or indirectly, to offer, give, request or accept any bribe i.e., gift, loan, payment, reward or advantage, either in cash or any other form of inducement, to or from any person or organisation in order to gain commercial, contractual or regulatory advantage for CLP, or in order to gain any personal advantage for an individual or anyone connected with the individual in a way that is unethical.

It is also prohibited to act in the above manner in order to influence an individual in their capacity as a foreign public official. You should not make a payment to a third party on behalf of a foreign public official.

If you are offered a bribe, or a bribe is solicited from you, you should not agree to it unless your immediate safety is in jeopardy. You should immediately contact your manager so that action can be taken if considered necessary. You may be asked to give a written account of events.

If you, as an employee or person working on CLP's behalf, suspect that an act of bribery, or attempted bribery, has taken place, even if you are not personally involved, you are expected to report this to your manager. You may be asked to give a written account of events.

Appropriate checks will be made before engaging with suppliers or other third parties of any kind to reduce the risk of our business partners breaching our anti-bribery rules.

CLP will:

- ensure that all of its transactions, including any sponsorship or donations given to charity, are made transparently and legitimately;
- take any actual or suspected breach of this Policy extremely seriously and will carry out a thorough investigation should any instances arise;
- uphold laws relating to bribery and will take disciplinary action against any employee, or other relevant action against persons working on CLP's behalf or in connection with us, should we find that an act of bribery, or attempted bribery, has taken place (whether or not this act constitutes a criminal offence);
- take disciplinary action or other relevant action against anyone retaliating against, or threatening, someone who has refused to commit bribery. This action may result in dismissal if you are an employee, or the cessation of our arrangement with you if you are self-employed, an agency worker, contractor etc.

All are reminded of CLP's Whistleblowing Policy.

## **7 GIFTS AND HOSPITALITY**

CLP realise that the giving and receiving of gifts and hospitality of nominal value (up to £ 250) where nothing is expected in return helps form positive relationships with third parties where it is proportionate and properly recorded. This does not constitute bribery and consequently such actions are not considered a breach of this Policy.

Gifts include money; goods (flowers, vouchers, food, drink, event tickets when not used in a hosted business context); services or loans given or received as a mark of friendship or appreciation.

Hospitality includes entertaining; meals or event tickets (when used in a hosted business context) given or received to initiate or develop relations. Hospitality will become a gift if the host is not present.

No gift should be given nor hospitality offered by a CLP employee or anyone working on our behalf to any party in connection with our business without receiving prior written approval from CLP's Chief Financial Officer (**CFO**). Similarly, no gift nor offer of hospitality should be accepted by a CLP employee or anyone working on our behalf without receiving prior written approval from the CFO.

A record will be made of every instance in which gifts or hospitality are given or received.

As the law is constantly changing, this Policy is subject to review and CLP reserves the right to amend this Policy without prior notice.

## **8 COMMUNICATION AND TRAINING**

All employees, contractors, agency workers, suppliers, consultants and other business partners must be made aware of this Policy and its requirements.

Workshop and/or online training are provided to those employees, contractors and third parties whose roles expose them to the risks of bribery and corruption.