



ILUKA

Anti-bribery and Corruption Policy

Iluka expects that its directors, officers, employees, agents, contractors and any other party representing Iluka, wherever they are in the world, will act fairly, honestly, with integrity and in compliance with the law.

Iluka therefore has zero tolerance for bribery or corruption in its business.

All countries in which we conduct business have laws that prohibit people and companies from engaging in corrupt conduct. Some of these prohibitions extend to cover bribes to private parties as well as to government officials. Breach of anti-bribery and corruption laws could have serious consequences for Iluka and its directors, officers, employees, agents, contractors or any other party representing Iluka.

We will:

- comply with anti-bribery and corruption laws;
- be alert for instances of corrupt conduct and report suspected or actual breaches; and
- maintain measures to detect and prevent bribery and corruption by any party representing Iluka.

We will not:

- exert any influence, lobby any official or offer / accept gifts or hospitality if this might cause or create a perception of impairing objective judgement, improperly influence a decision or create a sense of obligation;
- use company property or funds for any unlawful, unethical or improper purpose;
- make a facilitation payment;
- authorise, make, invite or accept any bribe or improper benefit;
- permit anyone to offer or pay bribes or make facilitation payments on behalf of Iluka; or
- offer or give anything of value to a government official (or their representative) to induce them to, or reward them for, acting improperly in the course of their public responsibilities.

Suspected or actual breaches of this Policy should be reported to your supervisor through the incident reporting system, the Whistleblower hotline or, for SRL employees, a member of the internal audit team.

Tom O'Leary
Managing Director

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