

Anti-Bribery & Corruption Policy

1. Purpose

- 1.1 This Anti-Bribery & Corruption Policy sets out the behaviour that Endurance expects from individuals in accordance this Policy, including Endurance's employees, officers, contractors suppliers and consultants (referred to in this Policy as **"individuals"** or **"you"**)
- 1.2 In this Policy, **"Endurance"** means Endurance Mining Pty Ltd, its wholly owned subsidiary Abra Mining Pty Limited, and any other related body corporate of Endurance Mining Pty Ltd.
- 1.3 This Policy is designed to comply with the *Corruption, Crime and Misconduct Act 2003* (WA), *Criminal Code Act 1913* (WA) and *Criminal Code Act 1995* (Cth) and having regard to other anti-bribery and corruption laws and regulations in any other country in which an individual does business.

2. Key Principles

- 2.1 Endurance will not engage in or tolerate any form of bribery or corrupt behaviour. This includes:
 - *offering, paying, soliciting or accepting bribes in any form;*
 - *offering or accepting an item, money, travel, hospitality, entertainment or other token of appreciation in exchange for practices of favouritism, discrimination or collusion; and*
 - *engaging in any form of corruption or corrupt business practices, for the benefit of Endurance, themselves or a third party.*
- 2.2 **"Bribes"** or **"bribery"** is the act of offering, promising, giving or accepting a benefit (monetary or non-monetary) with the intention of influencing a person to do, or omit to do, anything in the performance of their role or function, in order to provide Endurance with business or any other advantage that is not legitimately due or any advantage to an employee of Endurance .
- 2.3 **"Corrupt"** or **"corruption"** is the abuse of entrusted power for private gain. It involves dishonest or fraudulent behaviour by those in positions of power, typically involving bribery, extortion, or other illicit activities.
- 2.4 Both behaviours can be direct and indirect, and can occur in the public or private sector. It is irrelevant if a bribe is ultimately accepted or paid, or if any actual benefit is received by a party. Merely offering or intending to commit these behaviours will usually be sufficient for an offence to be committed.

Acts prohibited by Endurance

- 2.5 All individuals who work for or with Endurance must prevent and report the following behaviour:
 - ***Bribes:*** *giving, offer, promising, accepting, requesting or authorising a bribe, whether directly or indirectly.*

- **Gifts and hospitality:** offering or accepting gifts, entertainment or hospitality in circumstances which could be considered to give rise to undue influence.
- **Facilitation payments:** offering or giving money for the purpose of expediting or facilitating the performance of a public official for a routine governmental action, e.g. processing papers, issuing permits and other actions of an official in order to expedite performance of duties of a non-discretionary nature (i.e. which they are already bound to perform).
- **Secret commissions:** offering or giving undisclosed payments (or anything of value) or providing to any third party agent or representative for the purpose of influencing the conduct of the business of that person or another company.

Records kept by Endurance

- 2.6 Endurance keeps detailed financial records and has appropriate internal controls in place to evidence business reasons for making payments to third parties. These records and controls are governed by the Endurance Finance Team.
- 2.7 Individuals must ensure all financial payments to third parties are made and recorded in accordance with this Policy, and the applicable legislation and regulations.
- 2.8 Any alleged breach of this Policy should be reported promptly to Endurance's Company Secretary. Alternatively, any individual who wishes to raise a concern anonymously can do so in line with the Endurance's Whistleblower Policy.
- 2.9 Any reports of actual or suspected bribery and corruption will be treated seriously, and these will be notified to the Chief Executive Officer and the Endurance Board (where appropriate) for investigation as soon as possible after the matter has been reported.

Responsibilities of individuals

- 2.10 Managing bribery and corruption risk is a shared responsibility. All individuals must follow the procedures outlined in this Policy and cooperate with any investigation initiated pursuant to this Policy.
- 2.11 Anyone who breaches this Policy may be subject to serious consequences, including disciplinary action and/or termination of their engagement with Endurance (as appropriate). They may also be subject to legal consequences in the form of civil, criminal and financial penalties.

3. Further information

- 3.1 This Policy does not constitute a contractual commitment by Endurance, and it does not form part of, or affect, any contract of employment or services. This Policy may be amended at any time.
- 3.2 If you would like further information about matters covered in this Policy, including how to make a complaint under this Policy, please contact Endurance's Company Secretary.
- 3.3 This Policy is published on Endurance's website www.endurancemining.com.au


Matthew Hine
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