

## **Anti-Bribery and Corruption Policy**

Graphene Manufacturing Group (GMG) is committed to ethical business conduct and seeks to comply with its legal obligations.

Bribery and Corruption undermines legitimate business achievements, distorts sustainable business plans and exposes individuals and the Group to significant risk. GMG does not condone or tolerate misconduct relating to bribery and corruption matters, at GMG we:

- Conduct all business in an honest and ethical manner;
- Act professionally, fairly and with integrity in all business dealings and relationships;
- Prohibit giving or receiving of inappropriate gifts, promises or excessive hospitality in business dealings to gain favour or benefits either to a business or an individual;
- Openly disclose any relationships with potential business partners, suppliers, or customers to ensure transparency and fair decision-making processes are upheld;
- Have a Whistle-blower hotline available for any concerns to be raised;
- Conduct periodic anti-bribery and corruption audits of our business transactions to detect misconduct and monitor compliance with anti-corruption laws and policy;
- Record details of gifts, hospitality benefits and any other benefits in the gift register as required by the Anti -Bribery and Corruption Procedure.

This Policy, related standards and procedures apply to all GMG employees, suppliers, contractors, consultants, and other business partners. Implementation of this policy is supported by an Anti-Bribery and Corruption Awareness program.

Craig Nicol Founder and Managing Director Graphene Manufacturing Group July 2023