

## Our position on Bribery and Corruption of Public Officials

Wafi-Golpu Joint Venture and its owners, Newcrest Mining Limited and Harmony Gold Mining Company Limited, are committed to conducting business with integrity and honesty.

Bribery and corruption compromises government and company decision-making, and adversely affects the people of Papua New Guinea. Such practices are illegal under Papua New Guinean law and contrary to our values and governance policies.

It is a requirement for the WGJV to operate within the laws of Papua New Guinea and to comply with its governance requirements.

No matter how senior the Public Official or how important the decision or activity to our business:



We will not pay bribes to Public Officials, their associates or family.



We will not make payments to a Public Official to speed up or facilitate Government actions such as regulatory inspections, the granting of permits or the completion of official documentation.



We will not do "favours for", promise benefits to or improperly influence the actions of a Public Official (or their associates or family) may constitute a gratuity or improperly influence the actions of that Public Official.

We will not pay bribes, make facilitation payments, grant benefits or provide gratuities to any Public Officials. This includes the giving of gifts, offering employment to the relatives or associates of Public Officials, use of WGJV assets (such as the company helicopter or vehicles), and the provision of accommodation, travel and hospitality.

Any benefit which may be provided to a Public Official shall be only as expressly permitted under Papua New Guinean law and in line with the WGJV Anti-Bribery and Corruption Policy and the WGJV Travel Assistance and Hospitality for Officials and Others Policy.

To support our position on bribery and corruption, Wafi-Golpu Joint Venture is also committed to promoting cashless payments in its business activities.

WGJV will strictly enforce compliance with Papua New Guinean, Australian and international laws and WGJV Policies.

## Posisen bilong kampani sapos ol gavman wokman na wokmeri i laik kamapim pasin braiberi na korapsen

Wafi-Golpu Joint Venture na ol papa bilong kampani, Newcrest Mining Limited na Harmony Gold Company, i sanap strong na tok ol i bai mekim bisnis insait long PNG long gutpela na stretpela pasin. Bai i nogat korapsen i kamap.

Braiberi na korapsen i save bagarapim planti samting. Ol sampela ol disisen kampani na gavman i mekim i ken bagarapim sindaun bilong ol man na meri bilong PNG. Dispela em brukim lo bilong PNG. Em i no stretpela na gutpela pasin.

WGJV bai wok aninit long mama lo bilong PNG na i mas bihain gut wanem samting gavman i tok.

Mipela bai sanap strong long dispel tok na bai i nonap surik sapos yu bikpela wokman or wokmeri bilong gavman.



Mipela bai i nonap baim braiberi i go long wokman o wokmeri bilong gavman, ol wanwok bilong ol na ol femili bilong ol.



Mipela bai i nonap baim ol gavman wokman o wokmeri long hariapim sampela wok kampani i laikim gavman long mekim. Mipela bai i nonap mekim tru dispela na tokim gavman long givim tok orait long mipela



Mipela bai i nonap mekim promis long ol gavman wokman na wokmeri na tokim ol olsem sapos ol i mekim sampela wok bilong mipela, mipela bai givim ol sampela gutpela samting. Mipela bai i nonap mekim wankain long ol wanwok na femili bilong ol.

Mipela bai i nonap givim braiberi moni, mekim gut long ol na givim ol presen. Mipela bai i nonap long traime na givim wok long ol wantok bilong ol, na tu ol i nonap yusim kampani kar o elikopta long mekim praivet wok bilong ol.

Sapos mipela bai mekim dispela, bai mipela bihainim mama lo bilong PNG na lo bilong kampani tu aninit long 'Anti-Bribery and Corruption Policy' na 'Hospitality for officials and others policy.'

Wanpela samting kampani i bai mekim long sapotim dispela toktok bilong korapsen na braiberi em WGJV bai i nonap givim cash moni. Bai mipela putim moni i go long bank akaunt

WGJV bai hihainim lo bilong PNG, Australia na tu lo bilong kampani yet.



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## ANTI-BRIBERY & CORRUPTION PROTOCOLS

### DO'S and DON'TS



# DO

## ✓ **Keep accurate records of payments**

Keep accurate and complete records of payments and obtain receipts where possible.

## ✓ **Consult with WGJV's Commercial Department**

WGJV's Commercial Department is there to assist with any queries you may have in relation to the matters covered by the Anti-Bribery and Corruption Policy.

## ✓ **Prepare a due diligence report on appropriate third parties**

It is important to discuss with WGJV's Commercial Department whether due diligence is required in a particular circumstance. Conducting due diligence will reduce the risk of liability for WGJV arising from any improper payment made by a person or entity with which it deals.

## ✓ **Report all instances of bribery or other improper conduct**

The Anti-Bribery and Corruption Policy requires you to report all conduct in breach of the Policy to your manager, the WGJV Operating Committee or through WGJV's Code of Conduct Service.

## ✓ **Be aware of the consequences of non-compliance**

The legal and business consequences of breaching the Anti-Bribery and Corruption Policy can be severe for both individuals and companies. Breach of the Policy will be regarded as serious misconduct and will lead to disciplinary action.

# DON'T

## ✗ **Offer, give or accept bribes**

Bribery occurs when someone offers, authorises or provides a benefit to a person or entity with the intention of influencing that person or entity in order to obtain or retain business or an undue advantage.

## ✗ **Make Facilitation Payments**

Facilitation payments are payments made to public officials, either directly or indirectly, to ensure or accelerate the performance of routine government acts.

## ✗ **Offer or pay secret commissions**

Secret commissions occur where a person gives a commission to the agent of another person or entity, which is not disclosed to that person or entity. The commission is given to induce the agent to influence their principal's decision-making.

## ✗ **Engage in money laundering**

Money laundering is the process by which a person or entity conceals the origins of illegally-obtained money by disguising that money to make it appear legitimate.

## ✗ **Give or accept improper gifts, benefits, meals or entertainment**

The giving or receiving of gifts, benefits, meals and entertainment is strictly prohibited, except in certain limited circumstances. Make sure you understand the WGJV Anti-Bribery and Corruption Policy, WGJV Travel Assistance and Hospitality for Public Officials Policy, and WGJV Donations Policy in this connection.



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**LO MIPELA BAI BIHAINIM  
LONG STOPIM BRAIBERI NA  
KORAPSEN**

**Wanem samting mipela bai  
mekim na wanem samting bai  
mipela i no inap mekim**



## WANEM SAMTING MIPELA BAI MEKIM

- ✓ **I mas gut gutpela rekot bilong moni WGJV i baim samting long em**

Dispela rekot i mas tokaut stret long olgeta samting WGJV baim. Sem taim tu bungim gut ol dispela risit long soim olsem trutru yu baim dispela samting.
- ✓ **Toktok wantaim ol wokman na wokmeri bilong WGJV's Commercial Department**

Ol wokman na wokmeri bilong dispela dipatmen i ken halivim yu sapos yu gat sampela askim long sait bilong anti-braiberi na korapsen polisi kampani i gat.
- ✓ **Mekim wanpela lo na bihainim gut tru dispela lo taim yu laik mekim bisnis wantaim narapela kampani**

Em i impoten tru long toktok wantaim WGJV Commercial Department sapos kampani i gat dispela lo long bihainim. Dispela lo i ken daunim hevi long kamap long kampani wokman na wokmeri. Sapos ol dispela lain o bisnis i baim ol wokman na wokmeri bilong WGJV na ol ting olsem dispela paymen i no stret o i luk olsem em braiberi, askim WGJV Commercial Department long toktok moa long dispela.
- ✓ **Ripotim olgeta taim wok braiberi i kamap na ripotim tu ol sampela pasin yu ting em i no stretpela na trupela pasin.**

Anti-braiberi na korapsen polisi bilong WGJV i tok olsem yu mas ripotim olgeta samting sapos yu brukim dispela lo.
- ✓ **Lukaut long hevi i ken kamap long yu sapos yu no bihainim dispela lo**

Yu ken kisim bikpela hevi tru sapos yu brukim Anti-braiberi na korapsen polisi. Kampani i ken rausim yu long wok.

## WANEM SAMTING BAI MIPELA I NO INAP MEKIM

- ✗ **Mipela bai i no inap kisim o givim braib**

Braiberi i save kamap taim ol lain i givim tok orait o ol i givim sampela gutpela samting olsem moni o ol presen. Ol i givim dispela samting long grisim ol long sapotim wok bisnis bilong ol.
- ✗ **Baim ol gavman wokman o wokmeri**

WGJV bai i no inap givim moni long ol gavman wokman na wokmeri na grisim ol long mekim na hariapim wok bilong gavman.
- ✗ **Hait na givim komisen**

Hait na givim komisen long ol wokman o wokmeri bai kamap taim yu givim komisen i go long agent o ol namel man o namel meri. Dispela ol lain husait i makim maus bilong ol wokman or wokmeri tasol ol dispela wokman o wokmeri i no save. Dispela komisen ol i givim long namel man o namel meri i bai mekim ol i toktok strong na grisim ol lain long senisim tingting bilong ol.
- ✗ **Hait na kisim moni i no long gutpela wei (Money laundering). Dispela moni em stil moni na em iligol na yu ken go long kalabus.**

Money laundering em wanpela wei taim ol man o meri i hait na kisim moni. Dispela moni em i iligol o stil moni na ol i kisim dispela moni, haitim na mekim kamap, legal o gutpela gen long yusim.
- ✗ **Kisim o givim ol samting o sampela kain benefit, kaikai o mekim ol hamamas**

Tambu tru long givim o kisim ol samting, ol benefit, kaikai o ol sampela kain samting wei bai mekim yu hamamas. Sapos yu laik kisim dispela ol samting yu mas save gut long WGJV Anti-Bribery Corruption Policy, WGJV Travel Assistance and Hospitality for Public Officials Policy na WGJV Donations Policy