



ANTI-CORRUPTION POLICY

At OceanaGold (Philippines), Inc. (the “**Company**”), we want to contribute and succeed fairly and honestly. We have zero tolerance for bribery, corruption and fraud in any form including, direct or indirect, public sector or private bribery, facilitation payments, secret commissions, kickbacks, theft, or other related improper conduct such as breach of applicable sanctions and money laundering (**Corrupt Practices**).

This policy applies to the Company, its subsidiaries, directors, employees, contractors, consultants, agents and anyone representing or acting on behalf of the Company or its subsidiaries (**Personnel**).

Our commitment to achieving a workplace free of Corrupt Practices will be achieved through the implementation of, and adherence to, systems and activities focused on preventing, detecting, and addressing Corrupt Practices. The key elements include:

- Complying with all applicable laws and regulations, and acting in accordance with our Values;
- Board and senior leadership commitment to prohibit Corrupt Practices;
- Implementing and maintaining supporting policies, standards and procedures including our employee Code of Conduct, Supplier Code of Conduct, and Anti-Bribery and Anti-Corruption Standard, which set out further requirements Personnel must comply with in order to comply with this policy;
- Understanding and managing the potential for Corrupt Practices by identifying and assessing risks and implementing controls including those related to gifts, travel, hospitality, entertainment, sponsorships and donations, conflicts of interest, expenditure, employment and third-party due diligence;
- Training, education, communication resources and information to enhance awareness and understanding;
- Mechanisms for reporting and investigating suspected breaches; and
- Monitoring, assuring, auditing and continuously improving the effectiveness of our systems and activities.

We are all responsible for the prevention, detection, and mitigation of Corrupt Practices. All Personnel are required and expected to:

- Comply with applicable laws, Company policies, standards and procedures related to Corrupt Practices;
- Never give, accept, ask for, offer, or authorize anything of value that might provide an advantage that is illegal, unethical or a breach of trust (including facilitation payments, kickbacks and secret commissions);
- Follow required guidance, thresholds and approvals for sponsorships and donations, when working with Public or Government Officials and for gifts, travel, entertainment and hospitality;
- Make impartial business decisions by identifying and appropriately disclosing and managing conflicts between personal and company interests;
- Seek relationships with people, business partners and third-parties that share our zero-tolerance of Corrupt Practices;
- Award work fairly and transparently following required responsible supply chain processes including appropriate due diligence;
- Be truthful and never misuse information or position for personal gain or financial advantage;
- Keep accurate books and records (i.e. not false, misleading, incomplete or inadequate);
- Clearly communicate this Policy and related standards to relevant people; and
- Report any concerns you have about potential Corrupt Practices through the Code of Conduct Hotline or others listed in the Whistleblower Policy, and not retaliate against those who speak up.



All directors and people leaders are also required to:

- Foster a culture of integrity with zero tolerance for Corrupt Practices;
- Promote awareness of, and compliance with, this policy and related standards; and
- Appropriately manage reports made to them about potential breaches of this policy and escalate as required.

Failure to comply with this policy or the related standards is a serious matter and may result in disciplinary action, further remedial action, dismissal or termination of third-party contracts. Non-compliance with laws can also result in severe legal penalties including civil and criminal penalties, as well as negative repercussions to individual's and the Company's reputation.

These commitments are consistent with the Company's Purpose, Vision, and Values and are integral to all aspects of our business. This policy is approved by the Board of Directors and promoted and championed by the Management Team.

Approved by:

**The Board of Directors of
OceanaGold (Philippines), Inc.
February 19, 2025**