

## ANTI-CORRUPTION and ANTI-BRIBERY POLICY

Peak is committed to compliance with Australian and Tanzanian law, the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions (1999), good international industry practice<sup>1</sup>, and the laws and regulations of all countries in which we work.

Bribery of any government official in any country is strictly against Peak corporate policy. Peak personnel are prohibited from offering or paying any bribe to any employee, official, or agent of any government, commercial entity, or individual in connection with Peak activities. At no time will any employment be given to any sitting government official.

A bribe is any money or other thing of value offered or given, directly or indirectly, with the intent to secure improper advantage for Peak. An act is improper if it involves someone performing a function illegally, unethically, in bad faith, without impartially, or in breach of trust.

Should personnel believe they are in danger for refusing a bribe to an official, the health and safety of the individual will be paramount. All transactions, including professional fees and suppliers, will be documented, and any action taken will be promptly reported in writing to the appropriate supervisor.

As a general guide, the giving or receiving of gifts and gratuities is prohibited. However gifts of modest value that are part of normal business practice, such as an occasional meal, are acceptable, subject to the express requirement that the gift was not accepted in return for making or recommending any loan, granting any extension of time for payment of monies to the company or committing the company to any financial obligation in favour of the party offering or receiving the gift.

Where gifts are offered above a nominal value, they should be discussed with the supervisor to gain approval in advance of offering the gift or courtesy.



**Darren P. Townsend**  
Managing Director



**Jonathan H.S. Murray**  
Chairman

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<sup>1</sup> As described in the US Foreign Corrupt Practices Act (FCPA) and the UK Bribery Act.