

Anti-Bribery and Corruption Policy – Quick Reference Guide



This Guide is to help you understand and remember your obligations under Galaxy's Anti-Bribery and Corruption Policy (**Policy**). A copy of the Policy is maintained on the Galaxy Intranet. This Guide is not a substitute for the Policy.

If you have questions about the Policy, contact Galaxy General Counsel or the Chief Financial Officer (**CFO**).

The Golden Rules

You must comply with the following Golden Rules whenever you are acting for or on behalf of Galaxy:

- 1 Always comply with the Policy and the law.
- 2 Never offer, solicit, give or accept a benefit as an inducement or reward for an improper act. This applies to all business dealings and interactions with the Private Sector and the Public Sector.
- 3 Always exercise particular caution when dealing with government and Public Officials (and their associates).
- 4 Never give or accept gifts or hospitality to obtain an improper advantage, or as an inducement or reward for something given in return. Never give or accept gifts or hospitality to or from someone involved in a tender with Galaxy. This applies to both business dealings and interactions with the Private Sector and the Public Sector.
- 5 Only give gifts and hospitality in accordance with the 'Gift Principles'.
- 6 Obtain pre-approval before giving or receiving gifts or hospitality worth more than **US\$100** to or from a Public Official. Enter any gifts or hospitality (regardless of their value) that you give to or receive from a Public Official in the Gifts & Hospitality Register maintained by the CFO or Galaxy General Counsel.
- 7 If you give or receive gifts or hospitality worth more than **US\$350** to or from anyone in the Private Sector, enter them in the Gifts & Hospitality Register maintained by the CFO.
- 8 Never make facilitation payments (unless your health, safety, liberty or property is threatened).
- 9 Never make political contributions on behalf of Galaxy.
- 10 Obtain pre-approval before making charitable donations on behalf of Galaxy.
- 11 Never make false, misleading or inaccurate records or entries in Galaxy's books and records.
- 12 Undertake appropriate, risk-based due diligence on third-parties with which Galaxy intends to do business.
- 13 If you see something, say something.

In the event of an inconsistency between this Guide and the Policy, the Policy prevails.

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Gifts & Hospitality

Under the Policy, there are restrictions on giving and receiving gifts or hospitality. Certain gifts and hospitality are prohibited. Other gifts and hospitality may need to be pre-approved or entered in Galaxy's Gifts & Hospitality Register.

Approval and Registration Requirements

Given to / received from	Pre-approval by Galaxy General Counsel or CFO	Registration
Public Official (or associate)	Required if value more than US\$100	Required regardless of value
Non-Public Official	Not required	Required if value more than US\$350

Prohibited gifts and hospitality

You **must not** give or receive gifts or hospitality in the following situations:

- 1 it is given or received with the intention of **obtaining, retaining or rewarding any improper commercial or other advantage** for any person, or to **induce any person to act improperly** or to reward them for doing so;
- 2 it may give rise to, or may be seen as giving rise to, a **conflict of interest**;
- 3 it is provided or received with the **intention or an expectation of getting something in return**;
- 4 it involves **parties in a tender or competitive bidding process** where Galaxy is tendering or bidding;
- 5 you know it to be **prohibited by the other party's organisation**;
- 6 it **comprises cash or a cash equivalent**;
- 7 it is **provided in your personal capacity** rather than Galaxy's, or it is provided secretly; or
- 8 it is in **breach of any applicable laws** or regulations, including local laws.

The 'Gift Principles'

When giving or receiving gifts or hospitality, it **must be**:

- 1 **provided in good faith** with the intention only to build or maintain legitimate business relations or offer normal courtesy;
- 2 **token and of minimal or nominal value** (such as small promotional items, diaries, calendars, or other similar items bearing the brand or logo of the provider);
- 3 **modest in value and not lavish or extravagant**, both in isolation and when considered in the context of other gifts and hospitality offered to or by the same party, and in the context of the standard of living of the country where the gift is offered;
- 4 **reasonable and appropriate** in terms of the type, value, occasion and frequency of provision in the particular circumstances, including local cultural sensitivities;
- 5 **consistent with reasonable business practice**, including local cultural sensitivities; and
- 6 **permissible under all applicable laws** and regulations, including local laws.