

ANTI-BRIBERY & ANTI-CORRUPTION POLICY

1. PURPOSE

The purpose of this Policy is to provide the Board, senior management and all employees of Buru Energy Limited (“**Buru**” or “**the Company**”) with a clear set of guidelines to ensure that Buru conducts its activities in an ethical and appropriate manner as well as complying with the laws and regulations of each jurisdiction in which it operates.

Buru is committed to promoting compliance by all contractors with this Policy and requires that all contractors retained by Buru under written contract should be made aware of, and agree in writing to comply with, Buru’s Code of Conduct and this Policy, as a fundamental term of their engagement.

2. OBJECTIVES

The specific objectives of this Policy are to ensure:

- Buru does not engage in corrupt business practices;
- Buru will implement procedures to prevent bribery and corruption involving any director, officer, employee, contractor or other party representing Buru;
- Buru will, at a minimum, comply with all applicable laws, regulations and standards, including Applicable Anti-Bribery Laws and where internal policies require a higher standard, will comply with such higher standard.

3. PRINCIPLES

Buru prohibits activities involving bribery, corruption, payment of secret commissions, facilitation payments or the exercise of improper influence in all jurisdictions in which Buru operates. This Policy applies to dealings with both Government Officials and any other third parties.

Gifts and entertainment, political contributions, charitable contributions, social investment, offers of employment and sponsored travel have the potential to be misused as a disguise for bribes for the purpose of influencing decisions or obtaining an advantage. In some circumstances it may be difficult to determine the true nature of these types of payments.

Accordingly, Buru has adopted this Policy to ensure openness and transparency in dealings with these payments. Any questions or issues regarding this Policy, should be directed to the Chief Financial Officer in the first instance.

4. CORRUPT PAYMENTS PROHIBITED

All Buru personnel are prohibited from making or accepting any corrupt payments. Without limitation, Buru specifically prohibits:

- The promise, offering, payment, solicitation or acceptance of bribes in any form, including the offer or promise of employment or sponsorship.
- Engagement in any form of corrupt business practices, whether for the benefit of Buru, yourself or another party.
- Facilitation payments, even if they may appear to be permitted under local laws.

Requests from Government Officials or other third parties to make or accept any form of corrupt payment must be immediately reported to the Chief Financial Officer or otherwise in accordance with Buru's Whistleblower Policy.

5. GIFTS AND ENTERTAINMENT

The offer, promise, giving or receiving of any gift or entertainment to or from Government Officials or other third parties has the potential to be construed, or used by others to allege, that Buru is trying to obtain or receive favourable business treatment by providing individuals with personal benefits.

However, the giving or receiving of gifts or hospitality is not always prohibited by applicable anti-bribery laws or this Policy. The gift or hospitality may be appropriate if it is for a genuine purpose, reasonable and provided as a common courtesy associated with the ordinary course of business, and not made with any intentions to influence or reward a third party for obtaining or retaining business or an exchange of favours.

Buru has adopted the following general guidelines for determining the appropriateness of gifts and entertainment to or from Government Officials and other third parties:

- There must be no expectation that the gift or entertainment is given in exchange for any return favour, commitment or advantage.
- The gift must not be made in cash or cash equivalents and must otherwise comply with the Code of Conduct and applicable laws.
- The gift or entertainment must be infrequent, reasonable and proportionate in value considering the local custom and law, position of the recipient and circumstances.
- The timing of the gifting or entertainment must have been considered objectively in respect of past, pending or future business activities to ensure it could not be perceived as a bribe.
- The gift must be given openly and in the name of a commercial entity, not in someone's personal name.

All giving or receiving of gifts or entertainment to Government Officials and other third parties must comply with the above guidelines and require the prior approval of the Chief Financial Officer.

Prior approval from the Chief Financial Officer is not required if the gift or entertainment is **not** to or from Government Officials and one of the following apply:

- the gift or entertainment to or from third parties has a value less than AU\$100; or
- the gift or entertainment to or from third parties is a business meal with third parties for the purpose of discussing Buru related business and is not outside common courtesy, having due regard for the seniority of attendees and the jurisdiction in which the meal occurs.

Personally paying for a gift, entertainment or other provision of value in order to avoid compliance with the requirements of this Policy is prohibited.

6. DEALINGS WITH GOVERNMENT OFFICIALS

For the purpose of this Policy, a Government Official is defined as any of the following:

- Official or employee of any government, or any agency, ministry or department of a government (at any level).
- Any person acting in an official capacity for a government regardless of rank or position.
- Official or employee of a company wholly or partially controlled by a government (for example, a state owned oil company), but excluding employees seconded to such companies.
- A political party or any official of a political party.
- Candidate for political office.
- Officer or employee of a public international organisation, such as the United Nations or the World Bank.
- Immediate family member (meaning a spouse, dependent child, parent or household member) of any of the above.

Buru requires the exercise of a high degree of caution when dealing with Government Officials. The provision of anything of value, no matter how small, has the potential to create the perception that Buru has sought to improperly influence the Government Official to obtain an advantage. For this reason Buru has implemented specific procedures when dealing with Government Officials:

6.1. Gifts and entertainment

Before offering or accepting any gift, meal or entertainment, regardless of value or nature of the gift or entertainment, approval from the Chief Financial Officer is required. Additionally, any gifts or entertainment given to or received from a Government Official must be recorded in the Government Official's register of gifts and entertainment.

6.2. Donations

Buru does not make donations to any political party, politician or candidate for public office in any jurisdiction, unless the donation has been approved by the Board. Caution should be exercised when donating to private charities favoured by Government Officials, as such donation could be conceived as a bribe.

6.3. Sponsored travel

Generally the payment of travel and travel related expenses for Government Officials is prohibited. In certain circumstances the Chief Financial Officer retains the discretion to approve the payment of travel and travel related expenses of Government Officials where:

- the payment is for reasonable, customary and bona fide expenditure incurred strictly in relation to travel and travel related activities;
- the payment is made directly to the vendor(s) of the travel services or, only to the extent such direct payment is not possible, reimbursed to the public official only upon submission of valid receipts; and
- the travel is directly related to the promotion, demonstration or explanation of Buru's business activities or facilities.

6.4. Offers of employment or sponsorship

Before any offer of employment or sponsorship is made to or on behalf of a Government Official, approval from the Board is required.

7. RECORD KEEPING AND REPORTING REQUIREMENTS

All gifts, entertainment and payments to and from Government Officials and other third parties that required approval by the Chief Financial Officer must be recorded and maintained in an accurate and auditable register. The Chief Financial Officer has responsibility for this register. Records that distort or disguise the true nature of any transaction are prohibited.

Each individual to whom this Policy applies must fully disclose all details regarding any and all such gifts, entertainment and payments they have made or approved or have received directly to the Chief Financial Officer and provide all relevant documentary support including a valid tax invoice for such items.

8. CONTRAVENTION AND PENALTIES

Any breach of Policy is to be reported to the Chief Financial Officer or in the case of the Chief Financial Officer, the Board.

Most countries have specific laws prohibiting bribery of Government Officials and other corrupt practices. Any breach of this Policy or local law could result in potentially serious consequences, including but not limited to termination of employment or contract by Buru, and fines and/or imprisonment under applicable laws.

9. COMMUNICATION

This Policy will be communicated and promoted at all levels of Buru's business and disclosed on Buru's website for reference by external stakeholders.

10. REVIEW OF POLICY

The Board will review this Policy at least every two years.

Approved by the Board

Date: 25 October 2018