

PP050 Bribery & Corruption Policy and Procedure

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1. Purpose

Bribery and corruption is, unfortunately, a feature of the business process throughout industry. The Government, businesses and non-governmental organisations are working together to tackle the issue but despite the collective efforts eradicating all forms of bribery and corruption will take time.

The Timmins Group therefore has a clear policy and we support our employees to make decisions in line with our stated position. Our company conduct is based on a commitment to act professionally, fairly and with integrity. We will therefore not tolerate any form of bribery or corruption.

The purpose of this policy is to set out the responsibilities within the Company in observing and upholding our position on bribery and corruption. In developing this policy we have made reference to the ‘Business Principles for Countering Bribery’ published by Transparency International.

2. Scope

This policy applies to all employees and extends to all our business dealings and transactions in which we operate.

We will encourage the application of this policy amongst our business partners including contractors and suppliers.

3. Responsibility

The responsibility for the on-going operation of this procedure lies with the Managing Director or his authorised deputy.

It is the responsibility of all employees to report any instances of bribery or corruption whether it is within the company or approaches made by suppliers or sub-contractors.

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4. Operation

Our Company Business Principles set out our commitment to operate responsibly wherever we work and to engage with our stakeholders to manage the social, environmental and ethical impact of our activities in the different markets in which we operate.

Our first principle is that Timmins Group does not engage in bribery or any form of unethical inducement or payment including facilitation payments and 'kickbacks.' All employees are required to avoid any activities that might lead to, or suggest, a conflict of interest with the business of the Company.

Employees must declare and keep a record of hospitality or gifts accepted or offered, which will be subject to managerial review. We do not make direct or indirect contributions to political parties.

We will uphold laws relevant to countering bribery and corruption in all the areas in which we operate, particularly laws that are directly relevant to specific business practices.

We will communicate this policy and relevant guidance to employees within the company, through our established internal communication channels.

We will also communicate this policy to our suppliers, contractors and business partners and wider stakeholders.

Managers, employees and agents will receive relevant training on how to implement this policy in the scope of their employment with the company.

Employees are encouraged to raise concerns about any instance of malpractice at the earliest possible stage by reporting to the Contract Manager or directly to the Managing Director if necessary.

Employees will receive the full support of the company when refusing to pay a bribe, even if it may result in the Company losing business.

The Managing Director will review the implementation of this policy and procedure in respect of its suitability, adequacy and effectiveness and make improvements as appropriate.

The accountants will establish feedback mechanisms in order to maintain accurate records - available for inspection - which properly and fairly document all financial transactions. Financial control systems are subject to regular audits to provide assurance that they are effective in countering bribery and corruption.

If any instance of bribery or corruption is identified, we will take remedial steps immediately, which could result in dismissal.

5. References

POL009 Fraud & Malpractice Policy Statement
PP009 Work Safe Procedure
PP037 Communication and Consultation Procedure