
ANTI-BRIBERY AND CORRUPTION POLICY

Our Commitment

Variscan Mines Limited ("**Variscan**" or the "**Company**") recognizes that bribery and corruption act to undermine legitimate business activities, distort competition and may expose the Company, its employees and other stakeholders to significant risks.

Variscan prides itself on its reputation for:

- acting with integrity and honesty wherever we do business; and
- committing to a zero-tolerance approach to bribery and corruption.

Variscan's reputation is built on:

- its values as a Company;
- the professionalism of our employees; and
- the collective commitment to acting with integrity, accountability and transparency at all times.

Variscan is committed to doing business with integrity, which includes always complying with the laws of Australia and every other country or jurisdiction in which we currently or in the future may operate.

Our Strategy

Variscan, its employees and representatives will act with integrity by:

- never offering, paying, soliciting or accepting bribes in any form;
- never offering or accepting an item, money, travel, hospitality, entertainment or other token of appreciation during a tender period from a supplier involved in that tender process
- never offering or accepting an item, money, travel, hospitality, entertainment or other token of appreciation in exchange for practices of favouritism, discrimination, collusion or which will have an influence on responsible business practices.; and
- never engaging in any form of corrupt business practice, for the benefit of the Company, another party or themselves.

Our Responsibility

All Variscan officers, employees, vendors, contractors, consultants and other business partners are expected to read, understand and adhere to this policy, and act at all times in keeping with the spirit of the policy.

Variscan provides a safe mechanism pursuant to its Whistleblower Policy to enable and encourage the reporting of any actual, alleged, or perceived, instances of bribery or corruption by any individual to which this policy applies.