



ANTI-BRIBERY AND CORRUPTION POLICY

(As of June 13, 2026)

I. POLICY

St. Augustine Gold and Copper Limited (“the Company”) adopts a strict zero-tolerance stance against bribery and corruption in any form. This Policy is an implementing policy of the Code of Business Conduct and Ethics.

II. APPLICABILITY

This Policy applies to all directors, officers, employees, and third parties acting on behalf of the Company, including suppliers, contractors, agents, and consultants.

III. DEFINITION OF TERMS

- a. Bribery - The offering, giving, receiving, or soliciting of anything of value, whether monetary or non-monetary, with the intent to improperly influence the actions or decisions of an individual, including public officials or private individuals.
- b. Corruption – The misuse or abuse of public or professional power for personal gain.
- c. Facilitation payment - Any payment made to a public official to expedite or secure routine governmental actions.
- d. Public Official – Any individual holding a legislative, executive, administrative, or judicial position, whether appointed or elected. This includes officers, employees, or representatives of government agencies, government-owned or controlled corporations (GOCCs), entities in which the government has majority ownership or control, and public international organizations.

IV. PROHIBITED CONDUCT

The offering, giving, soliciting, or acceptance of bribes, facilitation payments, kickbacks, or other improper advantages is strictly prohibited, in accordance with Republic Act No. 3019 and other applicable laws.

V. GIFTS, HOSPITALITY, AND DONATIONS

Gifts, travel, entertainment, sponsorships, and donations must be reasonable, transparent, and approved in accordance with Company policy, and must never be used to improperly influence decisions.

VI. REPORTING AND WHISTLEBLOWING

Any employee, director, officer, or third party who becomes aware of suspected bribery or corruption must promptly report it through the Company's designated reporting channels, including direct reporting to the General Counsel or through Legal, Compliance and Ethics through its email: compliance@kingking.ph. Reports may be made confidentially or anonymously.

The Company strictly prohibits retaliation against any individual who reports a concern in good faith. All reports will be handled with strict confidentiality and in compliance with applicable data privacy laws.

VII. DISCIPLINARY AND LEGAL CONSEQUENCES

Violations of this Policy may result in disciplinary action under the Labor Code of the Philippines, termination of contracts, and referral to appropriate authorities, where warranted.

VIII. TRAINING

The Company shall provide anti-bribery and anti-corruption training to all new employees upon joining, and annual training for all employees, particularly those in high-risk roles such as procurement, commercial, or positions that involve interactions with public officials, to ensure they understand and comply with this Policy.