Anti-Bribery and Corruption Policy

Purpose

The purpose of this Anti-Bribery and Corruption Policy ("Policy") is to set out Danakali Limited's standards of conduct in relation to the prevention of bribery and corrupt conduct.

Aligned to Danakali's value of Integrity and in accordance with the Company's Code of Conduct, this policy affirms the Company's responsibility and commitment to full compliance with applicable anti-bribery or anti- corruption laws and the provision of assistance to the relevant authorities to detect and prevent criminal activity.

Scope

The Policy applies to Danakali Limited and any of its subsidiaries (collectively defined in this Policy as Danakali or the Company) and their respective employees, officers, consultants, associates and contractors, anywhere in the world. It is to be read along with accompanying Guidance and complied with it at all times.

Policy Statement

The Company has a **zero-tolerance approach** to bribery and corruption.

The Company strictly prohibits:

- Offering, promising, giving, requesting, or accepting bribes;
- Any form of corrupt payment, including facilitation payments;
- Improper inducements or kickbacks;
- Fraudulent or deceptive conduct intended to improperly influence a business outcome .

All business decisions must be made in the best interests of the Company and not influenced by improper financial or other advantages.

Bribery

Bribery is a criminal offence. It includes giving or receiving a bribe or offering to give or receive a bribe. Danakali expressly prohibits the offering, giving, requesting or accepting of a bribe, anywhere in the world.

Bribery includes:

- Giving anything of value (even token value) if it is given with an improper motive. An improper motive means trying to influence a third party to perform their job improperly, or rewarding them for having done so;
- Offering something to try to influence a public official (see Guidance for an explanation of "public official");
- anywhere in the world, to help Danakali obtain/retain business or a business advantage;
- Pay a "facilitation payment". They are a bribe if they are not official fees.

Facilitation payments are non-official payments made to government officials anywhere in the world which the official (usually low level) may ask for to speed up/perform routine governmental action (such as processing visas, granting licences, providing mail delivery, unloading cargo, providing police protection, provision of telephone services or utilities etc.). Typically, the amount requested is fairly low – e.g. US$50, US$100, US$200. The only exception is if you have a genuine and immediate concern for your own safety. Further explanation of facilitation payments can be found in the Guidance.

An employee should also never authorise nor allow any third party working with or for Danakali, such as a contractor or joint venture partner, to pay bribes on behalf of Danakali.

Reporting of bribes

You must report any bribes, suspicions of bribes or requests for bribes to the Anti-Bribery Officer as soon as they occur. This includes bribes or suspicions concerning the actions of third parties – e.g. contractors working on Danakali's behalf. More details on how to report bribes are outlined in the Guidance.

Even if you only have a suspicion, it should be reported. You will not be penalised for reporting a suspicion in good faith, even if it turns out to have been unfounded.

Hospitality and gifts

The underlying principle of this Policy is that a gift or hospitality should not be given with the intention of seeking to improperly influence the recipient.

Danakali totally prohibits all hospitality - i.e. entertainment (explained in the Guidance) - given on behalf of Danakali with the intention of improperly influencing a third party to give business to Danakali or do it a favour. Similarly, never accept or request hospitality from someone seeking to improperly influence you.

The provision of any hospitality to a public official is expressly prohibited by Danakali without prior authorisation from the Anti-Bribery Officer.

Always comply with the financial limits for hospitality when both giving and receiving hospitality. Upper limits for meal and other hospitality/entertainment are provided in the Guide. If you intend to give or receive hospitality which exceeds the above monetary limits, prior approval from the Anti-Bribery Officer is required.

Danakali recognises, however, that subject to the above, the provision/receipt of hospitality is a normal part of doing business. For that reason, Danakali permits hospitality given to/received from third parties provided the hospitality is:

- Not in cash or cash equivalent or in the form of a loan; and
- Given to establish or improve good business relations, promote Danakali's business or image, or for some other bona fide business reasons; and
- Reasonable and proportionate in amount and scale to the status and seniority of both the person giving and receiving it – i.e. not lavish; and
- Not to a public official; and
- Within the financial limits set out above; and
- In compliance with the local laws of the country in question where the hospitality is provided; and
- Not involving insalubrious premises or illegal substances or excessive consumption of alcohol.

Giving or receiving gifts (explained in the Guidance) from third parties, such as suppliers, contractors and business contacts, is discouraged by Danakali.

In the event that a gift is given or received:

- They should not be more than token and in accordance with accepted business practices; and
- You should always seek advice from your line manager immediately; and
- No gifts should be offered or accepted with a value of more than the upper limit set out in the Guide without prior approval of the Anti-Bribery Officer.

You must report to the Anti-Bribery Officer by email all hospitality or gifts given or received within 3 working days of giving or receiving them. Your email must include the details set out in the Guidance. The Anti-Bribery Officer will keep a log of hospitality and gifts.

Contracts with third parties

When dealing with third parties:

- Only persons at management level may enter into contracts with third parties (e.g. consultants, contractors, agents, joint venture partners, suppliers and intermediaries, as more fully explained in the Guidance) on behalf of Danakali; and
- Never make an agreement on behalf of Danakali with a third party verbally, as all contracts must be in writing; and
- All proposed contracts must be referred to the Anti-Bribery Officer for approval as soon as practicable and in any event prior to signature; and
- Copies of all signed contracts must be sent to the Anti-Bribery Officer within 7 days of signature.

The Anti-Bribery Officer will consider what due diligence needs to be carried out on the other party before the proposed contract is entered into. Where practicable, the Anti-Bribery officer will also ensure the inclusion in the contract of clauses requiring the third party to comply with Danakali's Anti-Bribery Policy or its own equivalent policy.

Financial records

Bribes can go undetected due to poor financial record keeping, deliberate issue of misleading documentation or the hiding of secret accounts.

For that reason, all of Danakali's personnel are responsible for ensuring that:

- Danakali's accounting records accurately reflect the transactions to which they relate; and
- All books and records fully and fairly reflect all receipts and expenditures; and
- Documents are not issued which do not accurately record the transactions to which they relate; and
- There are no undisclosed or unrecorded funds of Danakali for any purpose – i.e. no secret accounts; and
- No expenses are paid without appropriate receipts and approval by the relevant line manager; and
- No third party is reimbursed for expenses or other expenditure incurred by them on behalf of Danakali unless full receipts are provided.

Charitable / political donations and lobbying

Political and charitable donations:

- Must never be used as a "front" for the payment of bribes; and
- Should not be made on behalf of Danakali without the prior approval of the Board of Danakali Limited.

No individual or firm should be engaged to carry out any lobbying activity or behalf of Danakali without the prior approval of the Board of Danakali.

Further Guidance

If you require any guidance on this Policy, please contact the Anti-Bribery Officer or refer to the Danakali Anti-Bribery Guidance, where you can find more information.

Review of the Policy

The Company will periodically review this policy and its implementation to ensure continued effectiveness and alignment with legal requirements, stakeholder expectations and emerging best practices.

Approval and Adoption

This Policy was approved by the Board on 2 October 2026 and takes effect from that date.