

ANTI-CORRUPTION PRACTICES DISCLOSURE STATEMENT

Vertex Minerals Limited (VTX) is committed to conducting all of its business activities fairly, honestly with integrity, and in compliance with all applicable laws, rules and regulations. Its Board, management and employees are dedicated to high ethical standards and recognise and support VTX's commitment to compliance with these standards.

In particular, VTX is committed to preventing any form of Corruption and Bribery and to upholding all laws relevant to these issues, including Anti-Corruption Legislation. In order to support this commitment, VTX has adopted our Anti-Bribery and Anti-Corruption Policy (ABC Policy) to ensure that it has effective procedures in place to prevent Corruption and Bribery.

This ABC Policy applies globally. To the extent that local laws, codes of conduct or other regulations (Local Laws) in any countries are more rigorous or restrictive than this ABC Policy, those Local Laws should be followed by any subsidiary operating in that country. Where a country has specific bribery and corruption Local Laws which are less rigorous than this ABC Policy, this ABC Policy prevails. VTX may, from time to time, provide country-specific directions for subsidiaries operating in countries outside of Australia.

Our ABC Policy sets out VTX's requirements in relation to interactions with Officials and Third Parties and it forbids corrupt interactions. In our ABC Policy, references to VTX includes all of its subsidiaries.

In conjunction with our Anti-Bribery and Anti-Corruption Policy, VTX has a Code of Conduct to provide a framework for decisions and actions in relation to ethical conduct in employment. It underpins VTX's commitment to integrity and fair dealing in its business affairs and a duty of care to all employees, clients and stakeholders. The document sets out the principles covering appropriate conduct in a variety of contexts and outlines the minimum standard of behaviour expected from employees. In that policy VTX encourages the reporting of any corrupt conduct.

Adding to its Anti-Corruption position, VTX has also adopted a Whistle Blower Protection Policy to:

- (a) encourage and support people to feel confident to speak up safely and securely if they become aware of wrong-doing or illegal or improper conduct within the Company;
- (b) provide information and guidance on how to report such conduct, how reports will be handled and investigated in a timely manner and the support and protections available if a report is made;

(c) set out the responsibilities of VTX and its management in upholding VTX's commitment to reporting any illegal, unethical or improper conduct; and

(d) promote ethical behaviour and a culture of speaking up to deter wrong- doing.

A1. There are initiatives and on-going stakeholder engagement to improve the broader operating environment and culture, in order to combat corruption:

According to the Mining Council of Australia's website:

While Australia's minerals industry has a mature risk framework in place, the sector must remain vigilant of bribery and corruption risks, and the MCA's active participation in the Bribery Prevention Network will help industry to identify and address new and emerging risks.

The MCA's support for the Network is part of the mineral industry's ongoing commitment to continuous improvement in environmental, social and governance performance.

Source: <https://www.minerals.org.au/news/building-stronger-culture-reduce-bribery-corruption-risks-mining> Accessed 16 November 2022

In addition to our Anti-Bribery and Anti-Corruption Policy, Code of Conduct and Whistle Blower Protection Policy, VTX has a Shareholder Communications Strategy to ensure that shareholders are informed of all major developments affecting VTX's state of affairs. This assists VTX in keeping a transparent operating environment in order to prevent or combat corruption and bribery.

As part of VTX'S developing investor relations program, shareholders can register with the Company to receive email notifications of when an announcement is made by VTX to the ASX, including the release of the Annual Report, half yearly reports and quarterly reports. Links are made available on VTX's website, on which all information provided to the ASX is immediately posted.

Shareholders are encouraged to participate at all GMs and AGMs of the Company. Upon the despatch of any notice of meeting to shareholders, the Company Secretary shall send out material with that notice of meeting stating that all shareholders are encouraged to participate at the meeting. VTX will ensure that appropriate technology is used to facilitate the participation of shareholders at such meetings and that meetings will be held at a reasonable time and place. Shareholders who are unable to attend meetings may ask questions or provide comments ahead of meetings.

VTX holds fast to our Continuous Disclosure Policy and considers this an ongoing initiative against corruption. In accordance with the ASX Listing Rule 3.1, once VTX becomes aware of any information concerning it that a reasonable person would expect to have a material effect on the price of value or the Company's securities, VTX must immediately disclose that information to the ASX.

A2. Total percentage of governance body members, employees and business partners who have received training on the organisation's anti-corruption policies and procedures, broken down by region

Currently, VTX has not conducted specific training on our anti-corruption policies and procedures but we anticipate the opportunity to deliver this training in the coming financial year. However, our Board members and directors are experienced in corporate policies and have a robust understanding of our anti-bribery and anti-corruption position and policy. Our CEO Roger Jackson is a long-standing member of the Australian Institute of Company Directors.

A3. Total number and nature of incidents of corruption confirmed during the current year

VTX has had no allegations or incidents of corruption and expects to continue as such and commits to upholding all applicable laws, rules and regulations.

Related VTX policies:

- Corporate Governance Plan, Schedule 1, Board Charter, 2021
- Corporate Governance Plan, Schedule 02, Corporate Code of Conduct, 2021
- Corporate Governance Plan, Schedule 08, Continuous Disclosure Policy, 2021
- Corporate Governance Plan, Schedule 12, Whistle Blower Policy, 2021
- Corporate Governance Plan, Schedule 13, Anti-Bribery and Anti-Corruption Policy, 2021
- Corporate Governance Plan, Schedule 14, Shareholder Communications Strategy, 2021
- Corporate Governance Plan, Schedule 15, Environmental, Social and Governance Policy, 2021
- Corporate Governance Plan, Schedule 16, Privacy Policy, 2021

Source:

Vertex Minerals Limited

Corporate Governance Plan

<https://vertexminerals.com/wp-content/uploads/2021/10/Corporate-Governance-Plan-VTX2806539.2.pdf>