



Anti-Bribery and Corruption Policy

1. Scope:

This policy applies to Asahi Refining which includes Asahi Refining USA Inc., Asahi Refining Canada Ltd and Asahi Refining Florida LLC. Asahi Refining has a global reach and we pride ourselves on our reputation for acting with integrity and honesty wherever we do business. We greatly value our reputation and believe that it is one of our competitive strengths. It is essential that Asahi Refining employees at all levels, and all those associated with Asahi Refining, protect our reputation.

Bribery and corruption are criminal offenses. In addition to the fines, penalties and reputational harm that Asahi Refining may suffer as a result of bribery and corruption, bribery and misrepresentation of the origin of refining materials can lead to human rights abuses and conflict financing as described in our Precious Metals Procurement Policy. Employees involved in bribery and corruption may face a fine, imprisonment or disciplinary action, including termination of employment. Third parties doing business with us are expected to comply with laws and adhere to our policies and contract provisions relating to the prevention of bribery and corruption, or risk termination of the business relationship.

Asahi Refining employees and others working on its behalf must not offer, promise or give a bribe to anyone, and must not request, agree to accept, or take a bribe from anyone.

2. Commitments:

Asahi Refining has a zero-tolerance policy to bribery and corruption and will:

- Act fairly, honestly, openly and in an ethical manner in all our business dealings and relationships.
- Uphold applicable national and international laws and regulations relevant to countering bribery and corruption wherever we operate.
- Implement and enforce effective systems within Asahi Refining to counter the risk of bribery and corruption.
- Prohibit the use of its businesses and services for money laundering, terrorist financing or other illegal activities conducted through commercial transactions, including those with suppliers of refining materials.

3. Governance:

We require that all Asahi employees, contractors, suppliers and other third parties comply with this policy. Where issues are detected will take appropriate measures to protect our integrity and reputation up to and including termination of employment or contracts.