

ANTI-CORRUPTION POLICY

OVERVIEW

Mawson has a zero-tolerance policy for bribery and corruption. We respect and comply with all applicable anti-bribery and anti-corruption laws in the countries in which we operate. In addition to exposing Mawson to severe sanctions and reputational damage, anyone who violates these laws can be subject to substantial fines and/or criminal prosecution.

BRIBERY

A “bribe” or “kickback” is any money, fee, commission, credit, gift, gratuity, thing of value or compensation of any kind that is provided, directly or indirectly, and has as one of its purposes the improper obtaining or rewarding of favourable treatment in a business transaction.

Reasonable and customary business gifts, meals and hospitality provided for a legitimate business purpose may be permissible under applicable laws and regulations. Please refer to Mawson’s General Counsel for guidance. No business courtesy may under any circumstances be offered or accepted where a reasonable person might conclude that the courtesy was offered or accepted with an expectation or obligation of favourable treatment in a business transaction.

FACILITATING PAYMENTS

This is a type of bribe generally used to facilitate or expediate the performance of routine, non-discretionary government action. Paying, offering, or promising to pay bribe or kickbacks to government or public officials for any reason is strictly prohibited.

A published, well-documented expediting fee paid directly to a government or state-owned agency is not typically considered a facilitating payment under anti-corruption laws. For example, paying a fee to expedite a passport application, deliver a package or process paperwork such as visas, is not considered a facilitating payment if those fees are payable to an entity, not an individual, and are published openly. If you have a query as to whether a payment is permission, please contact Mawson’s General Counsel for guidance.

PUBLIC OFFICIALS

A “public official” is any person who is paid with government funds or serves on behalf of the general public. If you are unsure whether a person is a public official, please contact Mawson’s General Counsel for guidance.

There are usually specific guidelines provided to public officials relating to the acceptance of gifts, meals, travel and entertainment. These guidelines generally also apply to the family members of public officials.

If it is permitted under local laws and regulations, Mawson may pay reasonable travel and related expenses for public officials which are directly related to the promotion, demonstration or explanation of its products and services. However, all such expenses must be approved in advance by either Mawson's General Counsel or Chief Financial Officer. You are also required to obtain approval in advance if you are hosting an event to which public officials are invited.

THIRD PARTIES

Mawson may be found responsible for bribes, kickbacks and/or facilitating payments made by third parties in connection with Mawson's business. Third parties may not be used to circumvent the laws or this Policy. Wilful ignorance is not a defence.

Mawson employees may, with prior approval from Mawson's General Counsel, accept modest and inexpensive gifts, meals or entertainment from third parties, provided that such courtesies are not (a) cash or a cash equivalent (e.g. a gift card); (b) likely to be interpreted as a bribe or kickback; (c) received more often than on a casual basis; (d) solicited by the employee; (e) likely to be interpreted as causing a conflict of interest; and (f) in violation of applicable laws and regulations.

In addition, Mawson employees who are involved in procurement decisions must ensure that such decisions are based wholly on normal business considerations, such as quality, cost, availability, service, and reputation.

INTERNAL CONTROLS

Mawson is required to create and maintain accurate records that reflect all the transactions of the Company and maintain an adequate system of internal accounting controls.

Mawson employees must ensure that all relevant records, including invoices, expense reports and any other business record accurately reflect the transaction and contain sufficient detail to identify the services provided and/or tasks performed.

REPORTING POTENTIAL OR ACTUAL VIOLATIONS

If you are confronted with or become aware of a situation which involves any of the activities described in this Policy, please immediately report the incident to Mawson's General Counsel.

Any questions or concerns about information contained in this Policy should be directed to Mawson's General Counsel.

Mawson will not retaliate, nor will it tolerate retaliation, against any individual for lodging a complaint in good faith with Mawson's General Counsel, or for participating in the investigation of any such complaint.

Approved and adopted: 23 August 2022