Business Integrity Policy

Société des Mines de Fer de Guinée (SMFG) is committed to the eradication of corruption and bribery of any kind, ensuring compliance with relevant legal requirements and reporting relevant information about SMFG to stakeholders in a timely and accurate manner.

SMFG will achieve this by:

- Complying with all relevant legislation, regulations and permits and in particular the requirements of the Partnering Against Corruption Initiative (PACI), United States Foreign Corrupt Practices Act, United Kingdom Bribery Act and similar laws in the jurisdictions in which SMFG operates,
- Upholding a Code of Conduct that addresses:
    - Anti-corruption,
    - Gifts, hospitality and entertainment,
    - Conflicts of interest,
    - Insider trading,
    - Market abuse,
    - Competition and anti-trust, and
    - Working with governments.
- Not giving bribes or using inappropriate or unlawful means when engaging with government officials, its partners and other stakeholders,
- Keeping accurate records of all its transactions, including with commercial partners, non-governmental organisations and governmental agencies,
- Complying with anti-trust laws in its interactions with its suppliers and competitors,
- Maintaining truthful and accurate records (such as financial, safety and environmental compliance) and retaining them for the required period of time, and
- Protecting the confidentiality of personal information about its employees and contractors.

Date: 22 December 2017