



anvilmining

CODE OF BUSINESS CONDUCT

Anvil Document Number: ANV-CG-POL-005

| Rev No. | Rev Date | Description | Prepared By | Checked By | Approved By |
|---------|------------|----------------|-------------|------------|-------------|
| 0 | 10/08/2010 | Issued for Use | S. McKenzie | | B. Turner |
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Table of Contents

Letter from the President & CEO5

Anvil’s Charter6

Personal Responsibility6

Compliance with the Law6

Laws that Apply to Anvil.....7

Ethics Committee7

Reporting Alleged Violations or Concerns8

Anvil’s Compliance Officer.....8

Our Policies9

1. Human Rights9

 1.1 Our Policy9

 1.2 Our commitment to human rights9

 1.3 Human rights at Anvil.....9

 1.4 Occupational health and safety9

 1.5 Equal opportunity in employment10

 1.6 Harassment and bullying10

 1.7 Human rights and the community11

 1.8 Security and human rights11

 1.9 Promotion of human rights.....11

2. Community and the Environment12

 2.1 Community policy12

 2.2 Environment.....12

 2.3 Alcohol and drug use13

 2.4 Cultural awareness13

3. Company Assets & Resources14

 3.1 Use of Company assets.....14

 3.2 Electronic communication systems.....14

 3.3 Public information15

4. Responsibility in Business Relationships at Anvil16

 4.1 Relationships with governments16

 4.2 Bribery16

 4.3 Facilitation Payments.....17

 4.4 Gifts and Gratuities18

 4.5 Discounts19

 4.6 Trade Practices.....19

 4.7 Political activities.....19

 4.8 Conduct of Anvil Representatives.....19

Use of Information.....20

- 4.9 Confidentiality20
- 4.10 Record keeping.....21
- 4.11 False accounts.....21
- 4.12 Government agencies.....21
- 4.13 Privacy21

Financial Responsibility22

- 4.14 Responsibility of Anvil employees, joint venture partners and
Representatives.....22
- 4.15 Financial inducements22
- 4.16 Insider trading23

5. Conflict Of Interest25

- 5.1 Conflicts25
- 5.2 Other business interests25

6. Accountability26

- 6.1 Responsibilities of employees, joint venture partners and
Representatives.....26
- 6.2 Responsibilities of Managers.....26

7. Responsibilities of the Board of Directors.....27

Letter from the President & CEO

To: All Employees, Joint Venture Partners, Agents, Consultants, Contractors, Suppliers and Representatives (the latter five will be collectively referred to as 'Representatives') of Anvil Mining Limited and its subsidiaries ('Anvil' or the 'Company').

Dear All

Anvil is an international company operating in the extractive industry and resources sector. Anvil is committed to building and maintaining a reputation for integrity, honesty and fair dealing in all of its relationships and business dealings. Anvil aims to achieve this by creating a corporate culture that encourages best business practice, including compliance with all of the laws and regulations which govern Anvil's operations.

Anvil's core values of integrity, honesty and transparency are fundamental to the way in which we work. This Code of Business Conduct defines the manner in which Anvil intends to achieve outstanding growth and development in accordance with our core values.

At Anvil, we place great emphasis on achieving high performance for our shareholders. We also focus on adding value to the communities in which we operate. We are committed to achieving our goals within a framework of ethical and responsible business practice.

The Code of Business Conduct is designed to be a practical guide to ethical business conduct for Anvil employees and Representatives, including joint venture partners,. By understanding, and adhering to the principles set out in this Code of Business Conduct, all Anvil employees and Representatives, including joint venture partners, should feel confident that they are acting in accordance with best business practice.

Anvil's Code of Business Conduct places a strong emphasis on all employees and Representatives, including joint venture partners, taking responsibility to ensure that their actions are in accordance with Anvil company policy.

It is important to remember that Anvil's reputation depends on the conduct of each and every employee and Representative, including joint venture partners, with whom Anvil is associated. Together, we can achieve commercial excellence through best business practice in a safe working environment which encourages responsibility, accountability and transparency in business.

We invite you to read our Code of Business Conduct, understand our core values, appreciate the way in which we operate and apply best practice standards to Anvil's business worldwide.

Yours sincerely

BILL TURNER
Chief Executive Officer
Anvil Mining Limited

Anvil's Charter

At Anvil, we believe in setting challenging goals and achieving them. We believe in working for our shareholders so that they see the value of their shares increase. We are committed to adding value to the communities in which we operate, to maintaining our reputation for integrity, honesty and transparency and to ensuring that our employees, Representatives and joint venture partners comply with all of the local laws and international standards to which Anvil is subject.

Personal Responsibility

Anvil requires every employee, Representative and joint venture partner to work with Anvil to achieve the standard of best business practice set out in this Code of Business Conduct. Ethics and behaviour are individual responsibilities, and the highest standards of behaviour are expected of all employees, Representatives and joint venture partners, regardless of their position in, or relationship with, Anvil.

This Code of Business Conduct provides a guide as to the manner in which Anvil intends to continue to achieve increased shareholder growth and the development of the communities in which it operates within the framework of best business practice. All Anvil employees, Representatives and joint venture partners must be familiar with this Code of Business Conduct. Anvil will strive to ensure that ethical business practice defines every facet of the Company's global operations and will take whatever steps are necessary to achieve this aim.

Compliance with the Law

Anvil requires that all its employees, Representatives and joint venture partners understand the laws and regulations which govern Anvil's business, including knowledge of local laws and international standards. Anvil is committed to ensuring compliance with all of the laws and regulations which govern its operations.

Ignorance of the law is not an excuse for non-compliance. Anvil will not excuse any breaches of the law or of the ethical standards set out in this Code of Business Conduct by any employee, Representative or joint venture partner.

Anvil employees, Representatives and joint venture partners should seek advice from Anvil's Compliance Officer or an Anvil manager or director if they have any queries about the laws and regulations within which Anvil operates.

Laws that Apply to Anvil

Anvil's operations are subject to a detailed legislative framework. This framework encompasses the laws of the countries in which Anvil is based, including Australia and Canada, the local laws of the countries in which it operates, as well as international legislation and standards of corporate conduct and corporate social and environmental responsibility.

For example, Anvil's operations are subject to Australia's Commonwealth Criminal Code and Canada's Corruption of Foreign Public Officials Act, which, amongst other things, make it an offence to bribe a foreign public official. Anvil is committed to educating its employees, Representatives and joint venture partners in relation to this issue through Anvil's Compliance Guide. For more information, please refer to Anvil's *Compliance Guide: Anti-Bribery and Corruption*.

Anvil is also subject to occupational health and safety laws which are adhered to on all Anvil sites. We believe that our employees are our most important asset and will do everything possible to ensure their health and safety in the work place. Anvil is also subject to laws relating to a range of issues including trade practices, competition and corporate governance.

Anvil is committed to ensuring that all of its directors, officers, employees and, where practicable, Representatives receive education and training that directly addresses the particular laws and regulations applicable to Anvil, including those specifically relevant to the area in which they work.

Ethics Committee

Anvil has established an Ethics Committee to ensure that it is fulfilling all of its legal, ethical and social responsibilities. The Ethics Committee's primary function is to ensure the integrity of Anvil's internal controls, which is a prerequisite to ensuring Anvil's compliance with the laws and regulations that govern its operations.

Reporting Alleged Violations or Concerns

Anvil employees and Representatives are expected to immediately report any violation of, or direct any question in relation to, the policies and procedures set out in this Code of Business Conduct to an Anvil manager or director or to Anvil's Compliance Officer. Any reports will be treated confidentially in accordance with Anvil's Whistleblower Policy. Please refer to *Anvil Whistleblower Policy*.

Anvil's Compliance Officer

All Anvil employees and Representatives must ensure that they understand which payments are permissible and which payments are not in accordance with this Guide. If any Anvil employee, Representative or joint venture partner is uncertain or has any questions or comments in relation to the Anvil policies set out in this Guide, they should contact Anvil's Compliance Officer, Mr Stuart McKenzie:

Mr Stuart McKenzie, Compliance Officer
Company Secretary
Anvil Mining Limited
Level 1, 76 Hasler Road,
Perth, Western Australia 6017
By Email: stuartm@anvilmining.com
By Telephone: +61 8 9481 4700

Our Policies

1. Human Rights

1.1 Our Policy

At Anvil we recognise and uphold human rights in the broadest sense, including the right to health, safety, education and an acceptable standard of living. We understand that these rights are inherent rights of all people, regardless of race, gender, ethnicity or economic status.

1.2 Our commitment to human rights

We aim to preserve and further the human rights of all people connected with Anvil, including the members of the communities in which we operate and the wider global community.

Anvil is committed to upholding the principles set out in the United Nations' Global Compact Principles.

1.3 Human rights at Anvil

Our relationship with our employees is of utmost importance to us. We are committed to creating a safe and rewarding work environment, in which all Anvil employees are treated fairly and equally.

1.4 Occupational health and safety

Anvil is committed to upholding the fundamental right of all of its employees to work in a safe environment in which all reasonable measures have been taken to protect their health and safety. At Anvil we will take all reasonable steps to:

- ensure that all our employees work in an environment which is safe and free from workplace hazards;
- pursue local recruitment, training and development; and
- carry out comprehensive employee training programs covering health and safety.

Anvil is committed to upholding the principles contained in the International Labour Organisation's Occupational Health and Safety Convention 1981 and Safety and Health in Mines Convention 1995.

For further detail in relation to Anvil's commitment to occupational health and safety, please refer to Anvil Sustainability Report 2007.

1.5 Equal opportunity in employment

Anvil believes in equal opportunity in the workforce. We believe that a person's individual attributes, including race, colour, religion, age, disability, family responsibilities, sexual orientation or political beliefs are irrelevant to their suitability for employment.

Anvil company policy is to create employment opportunities accessible to everyone, based on the sole criterion of the merit of each individual applicant. Merit is evaluated according to job related skills, qualifications, abilities and aptitudes. No employment decision should be influenced by any other criteria.

Employment decisions may constitute discrimination if they are unrelated to the suitability of a candidate for a position, or a current employee's employment performance, and will not be tolerated. Anvil's merit based philosophy extends beyond employment to all persons and entities associated with Anvil.

Anvil is committed to upholding the international standards set out in the United Nations' *International Covenant on Economic, Social and Cultural Rights*, the *International Convention on all Forms of Racial Discrimination* and the *Convention on the Elimination of all Forms of Discrimination Against Women*.

1.6 Harassment and bullying

Harassment can take many forms. Sexual harassment is uninvited and unwelcome behaviour of a sexual nature, including verbal comments or jokes and physical contact, which makes a person feel offended or intimidated.

Bullying is behaviour that intimidates, offends, degrades, insults or humiliates another person. It can be either physical or psychological.

If you feel that you are being harassed or bullied, please immediately contact a senior person with whom you feel comfortable, who may include the Compliance Officer, an Anvil manager or director or your human resources representative. All complaints will be treated confidentially in accordance with the Anvil Whistleblower Policy.

Anvil views harassment and bullying as serious misconduct. All allegations of harassment and bullying will be thoroughly investigated by Anvil's human resources division. Any breach of Anvil's policies concerning harassment or bullying may result in immediate termination of employment.

1.7 Human rights and the community

Anvil's commitment to human rights extends beyond the workplace to the broader community. Community responsibility is integral to the way in which Anvil conducts business.

We are committed to facilitating the growth and development of the communities in which we operate through our Corporate Social Responsibility Program.

1.8 Security and human rights

The safety of Anvil employees and the members of the communities in which Anvil operates is of utmost importance to the Company.

Anvil is committed to upholding fundamental principles of human rights in all of its security arrangements, including its interaction with both public and private security. To this end, Anvil observes the principles set out in the Voluntary Principles on Security and Human Rights in relation to security, risk assessment and the maintenance of human rights.

For further information, please refer to the Voluntary Principles on Security and Human Rights.

1.9 Promotion of human rights

Anvil is also committed to promoting respect for fundamental human rights beyond the communities in which it operates. Anvil encourages every person associated with the Company, including its employees and Representatives, to uphold and promote the protection of human rights and fundamental freedoms.

2. Community and the Environment

2.1 Community policy

At Anvil, we are committed to the growth and sustainable development of the communities in which we operate.

Anvil prioritises local recruitment, training and development in line with our Sustainable Development Policy.

Anvil is committed to integrating social, environmental and economic considerations into its business decisions to achieve the most positive outcome for Anvil shareholders and employees and the communities in which Anvil operates.

In operating our business, we will:

- carry out comprehensive training programs covering community health and the environment;
- reduce health risks at our operations and in the broader community;
- fulfil our ongoing social commitment to community development in the provinces in which we operate and to the communities in which our future business interests are established; and
- provide education, health care and employment opportunities to the members of those local communities.

2.2 Environment

Anvil is dedicated to best practice in environmental management at all stages of its operations, from exploration to mine closure.

The environmental management program at site level is overseen by the Company's Health, Safety and Environmental Officer and an environmental team of Congolese staff and includes comprehensive environmental impact assessments, the establishment of environmental management plans for Anvil operations and environmental audits.

2.3 Alcohol and drug use

Anvil encourages a responsible attitude towards the use of alcohol and drugs. Use of alcohol or drugs in the workplace can affect performance. It can also create serious safety hazards for other employees. Intoxication in the workplace is not permitted and may result in immediate termination of employment or association with Anvil.

Illegal drug use is prohibited at all times. It is prohibited for any person to possess, transfer or use illegal substances on Anvil premises, in conjunction with Anvil business, or at Anvil business functions.

2.4 Cultural awareness

Anvil employees and Representatives are often expected to travel overseas on Anvil business. Anvil views its employees and Representatives as ambassadors for the Company. Anvil encourages all of its employees and Representatives to:

- learn about the countries and communities in which they work;
- be aware of local customs and norms and the laws to which they are subject; and
- understand local cultural expectations and the social implications of their behaviour.

3. Company Assets & Resources

3.1 Use of Company assets

Anvil Company assets include all real and intellectual property, plant and equipment and all software owned by the Company. Anvil assets must be maintained and used for legitimate business purposes, although incidental personal use is permissible.

Anvil employees and Representatives are expected not to breach the applicable laws that regulate the use of those assets.

It is important that Anvil employees protect the Company assets under their control. Employees should take appropriate precautions to prevent theft, loss, damage or misuse of Company assets.

Information relating to the conduct of Anvil's business is an important resource. Anvil employees are responsible for safeguarding information and for maintaining accurate records, including safe storage of electronic information. Anvil employees must ensure that Company assets are not loaned, sold, or donated without management approval. Removal of Company equipment, supplies, or other resources without authorisation is prohibited. Any Anvil employee or Representative who removes Company assets without permission or authorisation will be dismissed and appropriate cases will be reported to the police.

3.2 Electronic communication systems

All electronic communication devices and systems supplied by the Company for use by Anvil employees and Representatives are Company assets. All electronic communications, including email and voicemail, form part of Anvil Company records.

Anvil employees and Representatives must ensure that Company records are adequately protected against damage, loss, theft and unauthorised access. It is important that voicemail, email and internet systems are adequately protected and safeguarded.

Privacy of electronic communications or information stored on Anvil systems is not guaranteed. Anvil systems must not be used to store or transmit offensive material, which includes pornographic images. Anvil views misuse of its electronic systems as

serious misconduct which may result in termination of employment or association with Anvil.

Anvil's electronic communication systems are primarily to be used for business purposes. Incidental personal use is permissible, although that use may be monitored. Excessive personal use of Anvil's electronic communication systems constitutes misconduct and may be subject to disciplinary action.

3.3 Public information

Anvil is a copper producer listed on the Toronto (TSX) and Australian (ASX) stock exchanges. The common shares of Anvil are also traded on the Berlin Stock Exchange.

Anvil has adopted all aspects of the ASX "*Principles of Good Corporate Governance and Best Practice Recommendations*" and complies with Canadian corporate governance and continuous disclosure requirements. Anvil will inform the TSX and ASX confidentially and without delay of any relevant information concerning the Company that is likely to affect the share price.

Anvil's Company Secretary is responsible for reporting information to the Stock Exchanges.

Anvil Company policy requires that all internally produced material (e.g. brochures, press releases and reports) must be approved by the Compliance Officer or an Anvil director. All publicly released information, including articles and presentations, must be approved in accordance with Anvil Company policy. All public communications must be accurate and complete, including reports to regulatory authorities.

Anvil employees who are asked to make speeches or give interviews on topics related to Anvil must first obtain approval from the Compliance Officer or an Anvil director before making the speech or giving the interview.

4. Responsibility in Business Relationships at Anvil

4.1 Relationships with governments

Anvil conducts its business globally. Anvil strives to maintain functional, honest and transparent relationships with the Governments and States of the countries in which it operates.

Anvil is not involved in the political process of any of its host countries. It does not seek special treatment from those Governments, or from individual Government officials.

Anvil is committed to obeying the laws of its host countries, including the laws relating to bribery. It will not break those laws despite any pressure from individual government officials, regardless of the financial incentive or profit opportunities.

Anvil's full policy regarding the payment of bribes and facilitation payments is set out in the Compliance Guide. For more information please refer to Anvil's *Compliance Guide: Anti-Bribery and Corruption*.

4.2 Bribery

Anvil employees and Representatives must not offer or accept cash or any other incentive, inducement or reward in any form, subject to a limited exception for minor facilitation payments in connection with routine government actions (see section 4.3 below). In particular, payments to win business or to influence a business decision in the Company's favour such as bribes, 'kick-backs', secret commissions and similar payments are strictly prohibited.

All business dealings should be accurately documented to reflect the true nature of the transaction.

Employees should take all practical steps to ensure that agents, contractors, intermediaries or business partners do not engage in conduct on Anvil's behalf that would contravene this Code.

Offering or giving bribes and other corrupt payments or benefits not only contravenes this Code but is a criminal offence under the Australian Criminal Code, the criminal

laws of Australian States and the laws of most foreign countries. Liability may extend not only to the individuals directly involved in making the payment or giving the benefit, but also to the company and to company directors or officers who expressly or impliedly authorised or permitted the payment to be made or the benefit to be given.

4.3 Facilitation Payments

In some countries it is customary for lower level government or public utility officials to demand payments or benefits to facilitate the provision of routine services or administrative actions. Anvil opposes these payments and encourages employees, agents and contractors to resist making them if possible. However, where the alternative is significant disruption to business activities, facilitation payments may be made within the strict limits laid down in the Australian Criminal Code, and in accordance with the procedure referred to below.

The limits are:

- the value of the benefit given must be of a minor nature;
- the benefit must be given for the sole or dominant purpose of expediting or securing the performance of a routine government action of a minor nature (see examples listed below);
- the action must be one that is ordinarily and commonly performed by the relevant official. It must not involve a decision about awarding new business or continuing existing business, or the terms of business; and
- the employee who gives the benefit must make a signed record of it (amount, date, to whom, for what) as soon as practicable after giving it, and keep the record.

Routine government actions include:

- granting a permit, licence or other official document that qualifies a person to do business in a foreign country or in a part of a foreign country;
- processing government papers such as a visa or work permit;
- providing police protection or mail collection or delivery;

- scheduling inspections associated with contract performance or related to the transit of goods;
- providing telecommunications services, power or water;
- loading and unloading cargo;
- protecting perishable products, or commodities, from deterioration; or
- any other action of a similar nature.

A routine government action does not include a decision, or encouraging a decision, about awarding new business, continuing existing business or the terms of new or existing business.

Employees may only make payments which are clearly within these limits. If an employee makes a payment, a written record of the payment must be sent to Anvil's Compliance Officer, within the required timeframe (see Anvil's *Compliance Guide: Anti-Bribery and Corruption*). Where it is not clear whether a payment is within the limits, advice must be sought from the Compliance Officer.

Representatives must not make facilitation payments on behalf of Anvil without prior approval from a Anvil employee.

4.4 Gifts and Gratuities

Gifts or gratuities may be accepted (or offered) only if they are of an incidental nature and should not exceed A\$150. Gifts in excess of this figure must be brought to the attention of the Compliance Officer and Manager of the department concerned. Unless approved by him or her they must be returned without delay with an explanation of Anvil's policy on these matters.

Provision of entertainment to, or receipt from, customers and suppliers should not extend beyond a level reasonably required to maintain an arms length business relationship.

Travel and accommodation offered by a supplier may not be accepted unless it is unconditional or of benefit to Anvil and has been approved by the Compliance Officer and Manager of the department concerned.

4.5 Discounts

All discounts to customers and employees are recorded on sales invoices and may not be taken in the form of additional unrecorded goods, goods of higher quality or value than those invoiced or by way of extended credit terms.

4.6 Trade Practices

The Trade Practices Act prohibits a range of anti-competitive conduct including collusion with competitors.

4.7 Political activities

Anvil does not support, or contribute funds, to any political party, individual politician, or candidate for public office in any of the countries in which it operates.

Anvil Company policy requires that Anvil employees and Representatives refrain from becoming involved in any political campaign or dispute. Anvil requires that its employees abstain from attendance at any event or social function the purpose of which is to show or gather support (financial or otherwise) for a particular political party or candidate.

4.8 Conduct of Anvil Representatives

It is important to recognise that inappropriate or illegal conduct by any party representing or working for Anvil will damage Anvil's reputation. It may also expose Anvil, and its employees individually, to adverse commercial or legal consequences. Consequently, there must be a diligent review of all Representatives prior to them being engaged to act on Anvil's behalf. Where there is any doubt, at any stage, issues regarding the use of a particular contractor or agent should be referred directly to an Anvil manager or director or to Anvil's Compliance Officer, who may refer the matter to Anvil's lawyers.

In the event that any concern does arise and is referred to an Anvil manager or Anvil's Compliance Officer, the Anvil Manager or Compliance Officer is required to report this concern to the Board pursuant to Anvil's guidance note "Note to Board: Management Compliance Report".

Anvil must ensure that all of its business, including business conducted through its Representatives, is conducted in accordance with the standards of best business practice set out in this Code of Business Conduct.

Use of Information

4.9 Confidentiality

Anvil employees and Representatives may acquire confidential information concerning Anvil or its joint venture partners during the normal course of their employment. The obligation to keep this information confidential continues even after you leave Anvil's employment or your business relationship with Anvil terminates.

Confidential information must be treated as confidential and must not be repeated, divulged or otherwise communicated to anyone outside Anvil who has not been authorised to receive it. No Anvil employee or Representative should use information which is confidential to the Company to obtain a personal benefit or for any other purpose.

The maintenance of confidentiality is essential to the conduct Anvil's business. All Anvil employees and Representatives must take appropriate action to maintain the confidentiality of information relating to the conduct of Anvil's business. This should include secure handling and storage of confidential documents and avoiding the publication of confidential matters.

It is essential that all information which is sensitive and confidential to the Company is protected. It is the responsibility of managers and supervisors to ensure that arrangements are put in place to protect such information.

Confidentiality provisions should be included in contracts with all persons who provide services to Anvil, including Representatives.

4.10 Record keeping

Anvil is required by law to keep detailed Company records. Company accounts, records and other documentation must be kept and disposed of only in accordance with the Anvil Company policy.

No Anvil Representative should record false entries in any Company records, regardless of the circumstances.

Anvil's Reporting and Record Keeping Policy is set out in Anvil's *Compliance Guide: Anti-Bribery and Corruption*.

4.11 False accounts

Creating false accounts or expense reports is regarded as serious misconduct which may result in termination of employment or business relationship. Anvil employees, joint venture partners and Representatives must ensure, so far as possible, that no payment is approved or made on behalf of Anvil if any part of the payment is to be used for a purpose other than that described by the documents supporting the payment.

It is important that Anvil's records are complete so that Anvil can maintain its reputation for transparency and accountability. Anvil will not tolerate any illegal activity. Anvil will immediately dismiss any employee, or terminate its association with any Representative, who engages in falsifying Company accounts or records.

4.12 Government agencies

It is important that all information provided to government agencies by Anvil is both accurate and complete. If inaccurate information is provided to a government agency, it may constitute a violation of the country's laws or regulations. Above all, Anvil employees, joint venture partners and Representatives must act with the utmost honesty and integrity when supplying information to the governments of Anvil's host countries. This will ensure that Anvil's reputation for honesty, integrity and transparency is maintained.

4.13 Privacy

Any information collected from employees, joint venture partners and Representatives must be obtained in accordance with the law. Anvil will ensure that any personal

information gathered about its employees is both accurate and up to date. Examples of personal information include salary, home address and contact telephone numbers.

The confidentiality of personal information must be strictly maintained. It is not permissible for personal information to be released to persons outside Anvil unless authority has first been obtained from the person to whom the information relates. If your job allows you access to personal information relating to other employees, you must not discuss that information with anyone else or provide it to other employees unless they require it for an approved work related purpose.

All questions relating to the release of personal information should be directed to an Anvil manager or director, or to Anvil's Compliance Officer.

Financial Responsibility

4.14 Responsibility of Anvil employees, joint venture partners and Representatives

Anvil employees and Representatives must be aware of, and comply with, all of the laws and regulations that apply to the conduct of Anvil's business. Any questions regarding these matters should be referred to an Anvil manager or director or to Anvil's Compliance Officer.

All Representatives must sign the Anvil Compliance Agreement acknowledging their commitment to comply with Anvil's Code of Business Conduct and Anvil's Compliance Guide: Anti-Bribery and Corruption.

4.15 Financial inducements

Anvil will not transfer funds to secret or unrecorded accounts for any purpose whatsoever.

Anvil Company policy prohibits the making of payments or payments in kind (including gifts or personal favours) to influence any person, including a government official, to award business or business opportunities to Anvil or to make decisions concerning the conduct of Anvil's operations which will benefit Anvil.

Bribery is strictly prohibited. To ensure that they do not breach the standards of best business practice set out in this Code of Business Conduct, the Compliance Guide: Anti-Bribery and Corruption or the laws and regulations which form the legislative framework within which Anvil operates, Anvil employees, joint venture partners and Representatives should never make or agree to make payments or confer benefits of any kind to influence the conduct of another person. This includes payments, gifts or other benefits to induce third parties to improperly grant permits, licences or benefits of any kind to which Anvil would not otherwise be entitled.

Anvil is committed to upholding the principles set out in the Organisation for Economic Co-operation and Development (“OECD”) *Guidelines For Multinational Enterprises*. Anvil's Compliance Guide: Anti-Bribery and Corruption sets out the steps that Anvil has taken to implement the *OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions*.

In addition, Anvil's policies concerning the offence of bribery, the making of facilitation payments and gifts, entertainment and travel expenses are also set out in the Anvil's *Compliance Guide: Anti-Bribery and Corruption*.

4.16 Insider trading

Australian and Canadian securities laws prohibit insider trading. No person who has material non-public information (which is important news that has not been disclosed publicly in a news release) concerning Anvil is entitled to purchase or sell securities of Anvil.

It is important that individuals who have access to price-sensitive information question whether they should deal in Anvil shares, or whether they should advise others in such dealings. If any dealings are undertaken before information is disclosed to the market, then the individuals involved may be breaking the law.

Senior management and employees who have access to detailed information about Anvil's financial performance or prospects should be particularly careful before dealing in Anvil shares. All employees must be certain, before trading in Anvil shares, that they are not in possession of price sensitive information that is not generally available to the market.

This is a difficult area of law and any questions should be directed to an Anvil manager or director or to Anvil's Compliance Officer who can, if necessary, seek guidance from Anvil's lawyers.

5. Conflict Of Interest

5.1 Conflicts

Anvil employees and, so far as practicable, joint venture partners and Anvil Representatives, must ensure that their personal business, investments and other activities (including those of family members and other close associates) do not place them in a position where their own interests may influence judgements or actions they take on Anvil's behalf.

5.2 Other business interests

Anvil employees should consider whether accepting additional employment with organisations other than Anvil, whether paid or voluntary, could create a conflict with Anvil.

Anvil employees who are considering accepting additional employment must receive approval from an Anvil manager or director before accepting a position in another company or organisation. If the position is likely to involve a significant amount of the employee's time, to the extent that it could affect their work performance at Anvil, or is likely to involve public controversy, requests for approval should be referred to the Compliance Officer.

6. Accountability

6.1 Responsibilities of employees, joint venture partners and Representatives

Anvil expects that all of its employees, Representatives and joint venture partners be familiar with this Code of Business Conduct, the Compliance Guide and the laws and regulations which directly relate to the area in which they work.

It is the responsibility of every employee, joint venture partner and Representative to comply with Anvil's Company policies and procedures. If you have any questions, you should immediately seek assistance from an Anvil Company manager or director or Anvil's Compliance Officer.

It is also the responsibility of every employee, joint venture partner and Representative to report any violations of this Code of Business Conduct, the Compliance Guide or any other law or regulation to an Anvil manager or director or to Anvil's Compliance Officer.

Anvil's Complaints Procedure is set out in Anvil's *Compliance Guide: Anti-Bribery and Corruption..*

All complaints will be dealt with confidentially in accordance with the *Anvil Whistleblower Policy*

6.2 Responsibilities of Managers

Managers are responsible for ensuring that all Anvil employees, joint venture partners and Representatives understand, and comply with, the policies and standards set out in this Code of Business Conduct and the Compliance Guide. They must also ensure that the employees for whom they are responsible are aware of any laws and regulations which directly relate to the area in which they work.

Managers and supervisors must ensure that the Anvil employees in their area have sufficient education and training to make them aware of Anvil Company policies and procedures, together with applicable laws and regulations. Managers must ensure that all employees are provided with a copy of this Code of Business Conduct and the Compliance Guide. Managers should also ensure that all new employees attend training in accordance with Anvil's Compliance Guide.

Managers and supervisors must consistently behave in accordance with Anvil Company policy. It is incumbent on all managers and supervisors to lead by example.

Queries concerning Anvil policies and procedures should be answered promptly or referred to Anvil's Compliance Officer. Similarly, suspected violations of this Code of Business Conduct, or of the laws and regulations that apply to Anvil, should be immediately reported to the Compliance Officer, to be dealt with in accordance with Anvil's Complaints Procedure.

Anvil's Complaints Procedure is set out in Anvil's *Compliance Guide: Anti-Bribery and Corruption*.

All complaints will be dealt with confidentially in accordance with the *Anvil Whistleblower Policy*.

7. Responsibilities of the Board of Directors

Anvil directors and executives must ensure that they comply with all Anvil Company policies and procedures set out in this Code of Business Conduct and the Compliance Guide and with all of the laws and regulations that apply to Anvil. Anvil's directors and executives must also strive to create a corporate culture that requires compliance with the legislative framework within which Anvil conducts its operations. Anvil directors and executives should promptly answer any queries they receive concerning Anvil policies and procedures or refer the matter to Anvil's Compliance Officer.

Anvil directors and executives are ultimately responsible for ensuring that Anvil employees, Representatives and joint venture partners uphold the highest standards of best business practice and for safeguarding Anvil's reputation for honesty, integrity and transparency and fair dealing.