

SINO GAS & ENERGY HOLDINGS LIMITED

ANTI-CORRUPTION POLICY

Sino Gas & Energy Holdings Limited (the **Company, Sino Gas** or **SGEH**) has a strict prohibition on all forms of bribery and corruption, as well as money-laundering, terrorism funding and similar offences. The Company is committed to full compliance with the various anti-corruption laws of all the countries in which it conducts business, including (without limitation) Australia and the People's Republic of China, and it requires all of its Personnel to comply with the law and the Company's practices.

The Company is committed to not only complying with its legal obligations, but also to acting ethically and responsibly, and the Company will compete for all business opportunities fairly, ethically, and legally and, when appropriate, will negotiate contracts in a fair and open manner. Moreover, the Company adopts and advocates principles, practices and standards designed to prevent, detect and combat corruption.

To fulfil the above objectives, the Company is committed to the following:

- a) acting honestly and with high standards of personal integrity;
- b) not giving or receiving bribes or facilitation payments or political donations;
- c) not to intentionally or recklessly conceal illegitimate payments by making, altering, or destroying Accounting Records;
- d) ensuring any corporate entertainment, gifts and travel-related expenses that are given to or received from third parties are lawful and appropriate in the circumstances;
- e) undertaking appropriate due diligence in the selection and engagement of all parties which the Company engages with;
- f) requiring our Personnel to not engage in any activity that would conflict with the Company's best interests; and
- g) proactively detecting, reporting, manage and mitigating any risks to the Company, in particular those with a corrupt element.

To achieve these commitments, the Company maintains and enforces this Anti-corruption Policy together with detailed Anti-Corruption Procedures available [here](#).

Compliance with this policy and its related procedures is a condition of employment. Breaches may result in disciplinary action, in addition to potential civil or criminal liability. These requirements imposed by this policy and related procedures are separate from and additional to, the legal prohibitions of the prospective legislation in which the individual operates.

All personnel working for the Company has a responsibility to promote a culture whereby their actions and those of their colleagues are consistent with this Policy.