

MALABAR COAL LIMITED

POLITICAL DONATIONS POLICY

INTRODUCTION

This is the Political Donations Policy (Policy) for Malabar Coal Limited and its related bodies corporate (as defined under the *Corporations Act 2001*) (Malabar Group) and Directors of companies within the Malabar Group.

PURPOSE

The purpose of this Policy is to set out the circumstances under which the Malabar Group and Directors may make political donations and the internal reporting requirements in respect of any donations made.

A political donation includes gifts, an amount paid as a contribution, entry fee or other payment to participate in a fund-raising function and annual or other subscriptions, which are made for the benefit of a political party, local council or elected member or candidate (federal, state or local).

MALABAR GROUP DONATIONS

Malabar Group may make political donations subject to receiving prior approval from the Chairman of the Board and compliance with the Company's Anti-Corruption Policy and any applicable legislative requirements.

DIRECTORS OF MALABAR GROUP COMPANIES

Directors are prohibited from making political donations on behalf of the Malabar Group, however may make donations in their personal capacity subject to compliance with this Policy. Directors must advise the Company Secretary at least three (3) business days prior to the Director (or any entity associated with the Director) making a political donation. Subsequent to making the political donation, Directors must advise the Company Secretary of the following:

- (a) The name of the party or person for whose benefit the donation was made;
- (b) The date on which the donation was made; and
- (c) The value of the donation.

REGISTER

The Company Secretary will maintain a register of political donations made by the Malabar Group and its Directors.

IN CONCLUSION

It is critical that no political donations are made by the Malabar Group and Directors without prior approval of the Chairman.