

1. CODE OF CONDUCT

1.1 Introduction

The purpose of the Code of Conduct is to guide and enhance the conduct and behaviour of Directors, officers, employees and contractors in performing their everyday roles.

The code encourages and fosters a culture of integrity and responsibility with the focus of augmenting our reputation as a valued employer, business partner and corporate citizen, in all our relationships. The Code's purpose is to assist in aligning the behaviour of the Board, management and employees with the Code of Conduct by maintaining core Company values and objectives. The Code of Conduct underpins the way our Company wishes to operate and it should be understood and abided by all concerned.

1.2 Respect for Persons

Directors, officers, employees and contractors should approach dealings with other persons equitably and with respect.

This involves:

- (a) Courtesy and responsiveness in dealing with others;
- (b) Fairness in supervision and dealing with other staff by valuing colleagues and their personal commitment to meet shared objectives;
- (c) Encouraging cooperation and engaging rational debate to accomplish alternative points of view;
- (d) Avoiding behaviour that might reasonably be perceived as harassment, bullying or intimidation;
- (e) Understanding and responding to the needs of our business partners and other stakeholders; and,
- (f) No discrimination on the grounds of people's race, religion, gender, marital status or disability.

1.3 Respect for the Law

Directors, officers, employees and contractors should respect the law and act accordingly by observing and respecting Australian laws, customs and business methods to the extent that we adhere to the underlying principles of our Code of Conduct.

1.4 Integrity

Directors, officers, employees and contractors should consistently maintain their integrity whilst carrying out their duties by avoiding conflicts between their private interests and responsibilities with respect to:

- (a) Use of confidential information obtained in the course of their duties;
- (b) Personal and financial relationships;
- (c) Receipt of gifts and other benefits that may create an obligation; and,
- (d) External activities and public comment.

1.5 **Diligence**

Directors, officers, employees and contractors should carry out their roles in a professional and conscientious manner.

This involves:

- (a) Endeavouring to achieve highest standards of performance and adhering to professional codes of conduct where applicable;
- (b) Fulfilling responsibilities to shareholders by continual delivery of shareholder value;
- (c) Exercising care for others in employment-related activities;
- (d) Taking responsibility for all issues for which we have control; and,
- (e) Reporting fraudulent, corrupt and unethical activities.

1.6 **Economy and Efficiency**

Directors, officers, employees and contractors should carry out their roles in a cost effective and responsible manner. This includes:

- (a) Using Company property and equipment only for authorised Company business.
- (b) Avoiding waste of Company resources.
- (c) Maintaining adequate security over Company property and resources and proper use of the Company's assets.

1.7 **Respect for the Environment**

It is a core value of the Company to respect the environment, promote sustainability and reflect the expectations of the communities in which the Company operates.

1.8 **Respect for Heritage**

The Company respects Indigenous and non-Indigenous heritage and is committed to working in an effective and collaborative manner with the communities in which we operate with respect to heritage issues.

To achieve this the Company has, and will continue to:

- (a) Carry out surveys at proposed exploration to assess cultural heritage and develop strategies to minimise or avoid impact on identified Indigenous and/or non-Indigenous heritage sites and cultural places;
- (b) Establish and maintain positive and meaningful communication with all affected groups;
- (c) Consult with Indigenous communities whose country may be affected by our activities;
- (d) Develop and implement indigenous cultural heritage awareness for staff and contractors.

1.9 **Participation in the Community**

The Company aims to be actively involved at all levels of the community within which it operates. Directors, officers, employees and contractors should strive to establish and maintain a high level of understanding and co-operation with local communities, stakeholders and government departments.

Wherever possible and financially viable, the Company will utilise the services of local suppliers in the vicinity of its operating sites.

1.10 **Occupational Health and Safety**

The Company is committed to the health, safety and security of its directors, employees, contractors and other people who interact with the Company through application of relevant Occupational Health and Safety standards.

1.11 **Observance of this Code of Conduct**

Directors, employees and contractors must raise any breach of this Code of Conduct they become aware of with their manager, or in the case of directors, with the Chairperson. If you are concerned that any such complaint may result in victimisation, then you should contact the Company Secretary who will maintain confidentiality and ensure that your complaint or concern is appropriately addressed.

An annual report is provided by the Company Secretary to the Company Board including a risk assessment to identify key risk areas, the steps taken to manage these risk areas, details of any breaches of the Code of Conduct and details of whether the Code of Conduct continues to be effective in helping manage or minimise this risk.

This Code of Conduct is to be reviewed by the Company Board annually, published on the Company website and is to be circulated annually to key managers for further distribution to employees and relevant parties to ensure ongoing education, awareness, implementation and monitoring of this Code by all relevant parties.

Reference to and explanation of this Code will be included in the regular induction of all people working for the Company and will be referred to in the employment contracts with the Company.