

## Policy

# Code of Conduct

22 October 2025

29Metals Limited<sup>1</sup> ('**29Metals**', or the '**Company**') is committed to conducting business in an ethical and responsible way.

This Policy:

- enshrines our Values;
- outlines the way we work; and
- confirms our expectations of everyone who works at 29Metals.

This Policy is a statement of what we expect of each other at 29Metals, and what our external stakeholders can expect of us.

### Document Control

Document Owner	Chief Executive Officer
Review Committee	Remuneration & Nominations Committee
Approval Authority	Board of Directors

<sup>1</sup> In this document, a reference to 29Metals includes each of its subsidiaries (from time to time), unless the context requires otherwise.

## 1. Scope

This Code of Conduct applies to everyone who works at 29Metals – directors, officers, employees, contractors and consultants, and anyone conducting business on behalf of 29Metals or a subsidiary ('29Metals Personnel').

The standards of conduct set out in this Code of Conduct apply both within the workplace and in any 29Metals business-related situation, including outside working hours or at locations other than 29Metals' workplaces.

This Code of Conduct should be read in conjunction with 29Metals' policies, frameworks, standards and procedures, including the key 29Metals policies mentioned in this Code of Conduct.

## 2. Our values

The cornerstone of the way we work at 29Metals is our values:

*Our Values – what we will expect of each other and what others can expect of us*



**T**

### Transparency

We will communicate openly and clearly with each other, our shareholders, regulatory stakeholders, business partners and the community



**E**

### Excellence

We will strive for excellence in all that we do through a focused approach on mining fundamentals and a commitment to sustainability



**A**

### Accountability

We will do what we say we will do. We will drive personal ownership and accountability across all levels of the Company, ensuring that we all understand the role we play in the success of 29Metals



**M**

### Mutual Respect

We will embrace diversity and deeply respect the differences and different perspectives of our workforce, our stakeholders, and the community. We will earn the respect of our stakeholders and the community through our actions



**S**

### Safety First

**Safety is non-negotiable – always front of mind in everything we do**



**TEAMS**

The keystone of our Values – **collaboration** – across our workforce, with the community and our other stakeholders

### 3. Key dimensions in the way we work

The key dimensions of the way we work and this Code of Conduct are set out below, including references to other 29Metals policies applicable to these key dimensions.

#### Caring for our people

29Metals is committed to the health, safety and wellbeing of its workforce. Nothing is more important than preventing workplace injury and illnesses, both physical and psychological. All 29Metals Personnel, and visitors to our workplaces, must comply with health and safety laws and our policies, procedures and standards, must act in line with this document and must report hazards, incidents and near misses immediately.

All of our employees, suppliers, contractors and visitors must be fit for work every day and not under the influence of drugs or alcohol.



#### Safety First



#### Mutual Respect

- Workplace Behaviour Policy
- Whistleblower Policy
- Diversity, Equity & Inclusion Policy
- Health & Safety Policy
- Risk Management Policy

#### Acting ethically

We prohibit any form of fraud, theft, bribery and corruption and comply with applicable antibribery and corruption laws. 29Metals' Values require that in all aspects of business we act honestly and adhere to the highest ethical standards. We prohibit facilitation payments of any kind, even if small or customary, and never accept or ask for bribes or any other favour.

Gifts, hospitality, and entertainment can only be offered or accepted that is of a modest value and has a lawful and legitimate business purpose. If a contract is being negotiated or tendered no invitations or gifts from existing or potential vendors can be accepted.



#### Transparency



#### Mutual Respect



#### Accountability

- Anti-Bribery & Corruption Policy
- Whistleblower Policy

#### Dealings with public officials

We seek to have positive, open, non-partisan and constructive relations with governments and government officials at all levels. 29Metals does not make political donations and senior management approval is required before any engagement with government officials on matters that have the potential for reputational impact.



#### Transparency



#### Accountability

- Anti-Bribery & Corruption Policy
- Whistleblower Policy

**Diversity, equity & inclusion** We value diversity and are committed to equity and inclusion in our workplaces and in all our dealings. We treat people fairly and with respect, and do not tolerate any form of inappropriate workplace behaviours, including bullying, harassment (including sexual harassment), unlawful discrimination, victimisation, vilification or intimidation.



#### TEAMS



#### Mutual Respect

- Diversity, Equity & Inclusion Policy
- Workplace Behaviour Policy
- Whistleblower Policy

#### Conflict of interest

All 29Metals Personnel must act in the best interests of 29Metals and not be in conflict with those interests. A conflict can arise when a person's professional judgement or actions may be unduly influenced by a secondary business, private business or close personal relationship. Any potential or actual conflict of interest must be disclosed without delay.



#### Transparency



#### Accountability

- Whistleblower Policy

## Company property

All Company property and assets must only be used for the benefit of 29Metals. This includes physical assets, intellectual property and confidential information. Occasional personal use of 29Metals' email, internet and telephones is permitted provided it does not interfere with work duties or Company information systems.



### Accountability

Whistleblower Policy

## Confidential information

Confidential information relates to any information about the business affairs of 29Metals which is not publicly available and includes business and asset performance, supplier pricing, corporate strategy, business plans, exploration data, technical information, and Company systems and processes. The security and proper use of Company information is mandatory.

Confidential information about 29Metals must not be used for private gain or the benefit of a third party.

Shares in 29Metals or other related organisations must not be bought and sold by anyone who holds confidential or inside information. Compliance with the Disclosure & Communications Policy is required at all times.



### Accountability

Disclosure & Communications Policy

Securities Dealings Policy

## Community

29Metals is committed to building and maintaining long-term and sustainable relationships with the communities in or near which we conduct our business. We do this by honouring our commitments, respecting our host communities' culture and acting in ways that positively build the reputation of 29Metals.



### Mutual Respect

Community Policy

Environment Policy

Diversity, Equity & Inclusion Policy

## Environment

We are committed to a high standard of care for the natural environment and take compliance with our regulatory obligations seriously.

29Metals Personnel are expected to consider the potential environmental risks and impacts of our work and report any actual or potential environmental incidents.



### Transparency



### Accountability



### Safety First

Environment Policy

Tailings Management Position Statement

Responsible Use of Natural Resources Position Statement

## Climate

We recognise that climate change is a global issue and 29Metals has a part to play. We are committed to identifying and implementing strategies to reduce 29Metals' energy usage and the carbon intensity of our operations.



### Excellence



### Accountability

Impacts of Climate Change Position Statement

Sustainability Policy

## Human Rights

We respect human rights and conduct business in accordance with applicable laws and standards. We are committed to ensuring no modern slavery happens within our operations or supply chains, including no human trafficking, forced, bonded or involuntary labour, and no child labour.

Our annual Modern Slavery Statement outlines our commitment to identifying and addressing any modern slavery in our operations and supply chain.



### Mutual Respect

Community Policy  
Modern Slavery Policy

## Privacy

Some information provided by 29Metals employees, shareholders, suppliers, customers, contractors and other third parties might be considered private information. We maintain the privacy of this information in the way we collect, manage and use personal information to prevent unlawful disclosure.



### Accountability

Privacy Policy  
Whistleblower Policy

## Speak Out

29Metals is committed to ensuring that concerns regarding non-compliant, illegal or unethical conduct or malpractice (including any breaches of this Code of Conduct) can be raised by people without them being subjected to victimisation, intimidation, harassment or discriminatory treatment, and have such concerns properly investigated.

29Metals encourages a workplace where all participants feel empowered to raise concerns. There are multiple channels for workplace participants and other stakeholders to raise concerns, including anonymously. The channels available include the independent Whistleblower Hotline Service established by 29Metals.



### Transparency



### Accountability

Whistleblower Policy  
Whistleblower Service

## Risk Management

We believe that a successful business is the result of safe operations and sustainable business practices, informed by a fit-for-purpose approach for the identification, evaluation and management of risks and opportunities.

All 29Metals' people have a role to play. We expect all 29Metals Personnel will actively identify, manage and report on risks, adopt a risk-based approach to decision making, take responsibility for risks and controls in our areas of responsibility, contribute to the continuous improvement of our approach to risk management.



### TEAMS



### Transparency



### Excellence



### Accountability



### Mutual Respect



### Safety First

Risk Management Policy

## 4. Breaches

Failure to comply with this Code of Conduct is a serious matter and may result in disciplinary action, up to and including termination of employment or contract.

## 5. Training

All 29Metals Personnel will be required to undertake training regarding this Code of Conduct at least annually, and a copy of the Code of Conduct will be made available to all 29Metals Personnel as part of the Company's normal induction procedures.

## 6. Oversight and review of this Code of Conduct

The implementation of this Code of Conduct is overseen by the Board's Remuneration & Nominations Committee (the '**Committee**'). This Code of Conduct will be reviewed at least annually to assess whether it continues to meet its purpose and objectives in the context of (among other things):

- guidance published by the ASX and the Australian Securities & Investments Commission (ASIC);
- governance expectations of shareholders and other market participants; and
- community expectations.

Any amendment to this Code of Conduct requires the approval of the 29Metals Board.

Material changes to this Code of Conduct will be promptly notified to the ASX and a copy of the updated Code of Conduct will be available on the Company's website at: <https://www.29metals.com/about/corporate-governance>.