

Policy

Workplace Behaviour

31 July 2026

29Metals Limited¹ ('29Metals' or, the 'Company') is committed to:

- promoting a harmonious and positive work environment through positive and supportive workplace behaviours; and
- resolving workplace behaviour concerns or conflicts in a fair and constructive way.

The requirements in this Policy are intended to reinforce and reflect the 29Metals Values – TEAMS and Mutual Respect.

This Policy should be read in conjunction with the Code of Conduct, the Diversity, Equity & Inclusion Policy, the Information Technology Policy and the Whistleblower Policy.

Document Control

Document Owner	Group Executive, People & Culture
Review Committee	Remuneration & Nominations Committee
Approval Authority	Board of Directors

¹ In this document, a reference to 29Metals is a reference to the 29Metals Limited and its subsidiaries, unless the context requires otherwise.

1. Scope

This Policy applies to all:

- 29Metals directors, employees and contractors; and
- persons present at a 29Metals workplace, including consultants, contractors, subcontractors, labour hire personnel and secondees,

(each a '**workplace participant**').

This Policy applies wherever and whenever there is a relevant connection between the behaviour or activity and working with 29Metals. For example, this Policy also applies to behaviour at work-related functions and places you visit for work, such as:

- work lunches, conferences, Christmas parties and contractor/consultant premises; and
- other functions sponsored by, or relating to, the Company.

Conduct which involves the use of 29Metals computers or devices also has a relevant connection with work, and a breach of this Policy using 29Metals' IT assets is likely also to breach the Information Technology Policy.

2. Unlawful conduct

Unlawful conduct in this Policy means any behaviour, act or omission that contravenes applicable Australian laws, including anti-discrimination, work health and safety and employment legislation. This includes, but is not limited to:

- discrimination
- harassment
- sexual harassment
- workplace bullying
- victimisation
- creating a hostile workplace environment

and any other conduct prohibited by law.

3. Discrimination, harassment, bullying and victimisation

29Metals is committed to promoting a work environment where all workplace participants are treated fairly and with respect, and free from inappropriate workplace behaviours, including unlawful discrimination, harassment, vilification and bullying.

All workplace participants should be aware that unlawful discrimination, harassment, vilification and bullying behaviour may also breach equal opportunity and anti-discrimination laws in the jurisdictions where 29Metals undertakes its business.

3.1 Discrimination

Unlawful discrimination in employment occurs when a person is treated less favourably in their employment because of a '**protected attribute**' or reason. What constitutes protected attributes and reasons differs under different state and federal laws, but irrespective of which law applies, this Policy prohibits unlawful discrimination.

Examples of protected attributes under relevant laws (collectively referred to in this Policy as '**EEO Laws**') include race, religious belief, disability, gender or gender identity, pregnancy, childcare responsibilities, sexual orientation and age.

A list of EEO Laws, along with a more detailed list of protected attributes under EEO Laws are set out in **Attachment 1** to this Policy.

It is also possible to discriminate against a person indirectly by imposing a term or condition which is, or may be perceived to be, more difficult for a person with a protected attribute to meet. For example, it might be indirect sex discrimination to have a requirement that you must be 180cm tall to do a particular job. Such a requirement could be discriminatory (i.e., on the basis that it is perceived to disadvantage one gender, on the basis that that gender is shorter on average than the other gender), if, in fact, the work could be arranged so that the height requirement was not necessary.

3.2 Harassment

Harassment is unwelcome conduct that a reasonable person would expect to offend, humiliate or intimidate another person. Harassing a person because of one of the protected attributes referred to above is unlawful.

3.3 Sexual Harassment

Sexual harassment is unwelcome conduct of a sexual nature, which makes a person feel offended, humiliated or intimidated. Conduct can amount to sexual harassment even if the person did not intend to offend, humiliate or intimidate the other person. However, conduct will not be sexual harassment if a reasonable person, having regard to all the circumstances, would not have anticipated that the conduct would offend, humiliate or intimidate the other person.

Sexual harassment does not have to be directed at a particular individual to breach the law or this Policy. Behaviour which creates a hostile working environment for other workplace participants can also be unlawful.

Examples of sexual harassment include, but are not limited to:

- physical contact such as pinching, touching, grabbing, kissing or hugging;
- staring or leering at a person or at parts of their body;
- sexual jokes or comments;
- requests for sexual favours;
- persistent requests to go out, where they have been refused;
- sexually explicit conversations;
- displays of offensive material such as posters, screen savers, Internet material etc;
- accessing or downloading sexually explicit material in a workplace setting, on a 29Metals IT device, or using the 29Metals IT network;
- suggestive comments about a person's body or appearance; and
- sending offensive emails, attachments or text messages.

Conduct between colleagues which is welcome and consensual is not sexual harassment, but you must take care not to offend others around you.

3.4 Bullying

Bullying is repeated, unreasonable behaviour, directed towards an individual or group, that creates a risk to health and safety. Unreasonable behaviour means behaviour that a reasonable person, having regard to all the circumstances, would expect to victimise, humiliate, undermine or threaten.

Behaviours that may constitute bullying, include but are not limited to:

- demeaning language;
- threats, abuse or shouting;
- coercion;
- isolation;

- inappropriate blaming;
- ganging up;
- constant unconstructive criticism;
- deliberately withholding information or equipment that a person needs to do their job; and
- unreasonable refusal of requests for leave, training or other workplace benefits.

It is not bullying for a manager or supervisor to counsel a workplace participant about their performance. Performance counselling is a necessary part of ensuring that workplace participants meet the standards of work and behaviour required by 29Metals. Also, other reasonable management actions such as taking disciplinary action, giving work directions and orders, and allocating work in accordance with business needs and systems do not constitute bullying, provided that the relevant action is done in a respectful and professional manner.

3.5 Victimisation

Victimisation is where a person is the subject of some type of retaliation or detriment because they have lodged a complaint, they intend to lodge a complaint or they are involved in a complaint, relating to or involving allegations of unlawful conduct or other misconduct (e.g., a witness).

Workplace participants must not retaliate against a person who raises a complaint or subject them to any detriment.

3.6 Vilification

Vilification is a public act which incites hatred, severe contempt or severe ridicule of a person or group, for example, because of race, homosexuality, transgender status, transsexuality or HIV/AIDS. Vilification is a particularly serious breach of EEO laws and will be dealt with accordingly.

3.7 Intention

Conduct can breach this Policy or a corresponding legal requirement even if there was no intention to discriminate, or to harass or bully another workplace participant. For example, a colleague may find a comment offensive or humiliating even though it is intended to be joking or teasing.

For this reason, and consistent with 29Metals' Values, it is important that all workplace participants consider the impact of their behaviour on others, and how behaviours may be perceived by a reasonable person.

4. Psychosocial hazards

Psychosocial hazards are hazards that arise from the work environment, workplace interactions or behaviours, and that may cause psychological or physical harm. Examples include bullying, harassment, discrimination, violence, unreasonable work demands, inadequate support, and other behaviours or work practices that may negatively affect a person's psychological health, safety or wellbeing.

5. Rights and Responsibilities

All workplace participants are required to understand the letter and spirit of all laws and regulations relevant to their work and place of work, and to comply with those legal requirements. Without limiting the generality of the foregoing, all workplace participants must:

- ensure they do not engage in any unlawful conduct towards other workplace participants, customers/clients or others with whom they come into contact through work;
- ensure they do not aid, abet or encourage other persons to engage in unlawful conduct;
- follow the grievance procedure in this Policy if they experience any unlawful conduct;
- report any unlawful conduct they see occurring in the workplace in accordance; and

- maintain confidentiality if they are involved in the complaint procedure.

29Metals' leaders are also expected to:

- be role models, demonstrating expected standards of behaviour;
- take steps to promote awareness of workplace participants' obligations under this Policy; and
- intervene and respond in accordance with this Policy if they become aware of inappropriate behaviour.

6. Grievance Procedure

If a workplace participant feels that they have been subjected to any form of unlawful conduct contrary to EEO laws or this Policy, or a workplace participant observes a colleague or fellow workplace participant being subjected to such conduct, they must not ignore it.

29Metals has a grievance procedure for dealing with these issues, with options available to suit the circumstances of each individual situation. The Grievance Procedure is set out in **Attachment 2** to this Policy.

Under the Grievance Procedure, complaints may be managed formally or informally, depending on (among other things) the nature of the complaint and after taking into account how the person making the complaint would like it to be handled.

The manner in which a grievance will be handled is at the discretion of 29Metals.

A Grievance Officer, or a supervisor or manager, who becomes aware of behaviour that does not comply with this Policy may take action under the grievance procedure even though no complaint has been made.

If a complainant is unsure about how to handle a situation and is also unsure if they want to make a complaint they should contact a Grievance Officer for support and guidance.

6.1 Confidentiality

The Grievance Officer will endeavour to maintain confidentiality of complaints and the complaint procedure as far as is reasonably practicable. However, it may be necessary to speak with other workplace participants in order to determine what happened, to afford fairness to those against whom the complaint has been made and to resolve the complaint.

If a complaint is raised and it appears that unlawful conduct has potentially occurred, 29Metals will take such actions in relation to the complaint as 29Metals considers appropriate, including reporting to relevant authorities as appropriate.

All workplace participants involved in the complaint must maintain confidentiality, including the workplace participant who lodges the complaint. Spreading rumours or gossip may expose workplace participants to a defamation claim.

6.2 Support person

An individual involved in a complaint may discuss the complaint with a designated support person or representative (which person or representative is not a workplace participant employed or engaged by 29Metals). However, the support person or representative must also maintain confidentiality.

6.3 Possible Outcomes

The possible outcomes arising from a complaint will depend on the nature of the complaint and the procedure followed to address the complaint. Refer to section 5 below.

If you believe that your grievance has not been dealt with in accordance with this Policy, you can inform the Group Executive, People & Culture for a review of the process adopted.

6.4 Grievance Officers

29Metals' Grievance Officers:

- any member of the People & Culture team at an operating site or corporate head office; and
- the Company Secretary (or their delegate).

7. Breach of this Policy

A workplace participant that breaches this Policy may be subject to disciplinary action up to and including termination of employment or contract.

Conduct which breaches this Policy may also be unlawful conduct and a workplace participant can be named personally as a respondent to a legal complaint. In addition, workplace participants who aid, abet or encourage other persons to engage in unlawful conduct can also be personally liable under the law.

If a person makes an unfounded complaint or a false complaint in bad faith (e.g. making up a complaint to get someone else in trouble or making a complaint where there is no foundation for the complaint), that person may be subject to disciplinary action. They also put themselves at risk of a defamation claim.

Conduct covered by this Policy may also be a breach of other 29Metals policies including, but not limited to, the Code of Conduct, the Diversity, Equity & Inclusion Policy and the Information Technology Policy.

8. Administration of this Policy

8.1 Training

All 29Metals employees will be required to undertake periodic training in relation to awareness and expectations of standards of workplace behaviour as outlined in this Policy, as part of the Company's compliance training cycle. The 29Metals' senior leadership team and site senior leaders will be required undertake training on an annual basis.

A copy of this Policy will be made available as part of the Company's normal induction procedures.

8.2 Review of this Policy

This Policy will be reviewed periodically to assess whether it continues to meet its purpose and objectives in the context of (among other things) applicable standards and relevant regulatory requirements, as well as community expectations.

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

A copy of this Policy will be available on the Company's website at: <https://www.29metals.com/about/corporate-governance>.

Attachment 1

Protected Attributes

The following are '**Protected Attributes**' under Australian laws as at the date of this Policy. Additional attributes may apply in one or more jurisdictions in which the Company operates its business.

- Race (including colour, nationality, descent, ethnic, ethno-religious or national origin)
- Religious belief or activity
- Sex
- Marital status, relationship status
- Pregnancy (including potential pregnancy)
- Homosexuality, transsexuality, transgender, gender identity, sexuality, sexual preference, lawful sexual activity
- Carers' responsibilities, family responsibilities, carer or parental status, being childless
- Disability, including physical, mental and intellectual disability
- Breastfeeding
- Age
- Physical features (unlawful in the State of Victoria only)
- Profession, trade, occupation or calling (unlawful in the Australian Capital Territory only)
- Industrial/trade union membership, non-membership or activity
- Political belief or activity
- Employer association membership, non-membership or activity
- Compulsory retirement
- Criminal record
- HIV/AIDS
- Medical record
- Spent convictions
- Defence service
- Association (that is, being associated with a person who has one or more of these attributes).

Attachment 2

Grievance Procedure

There are a number of options available to 29Metals and the complainant to manage a complaint, with varying degrees of formality. This Grievance Procedure sets out the steps that are to be following when responding to any complaints brought under the Company's Workplace Behaviour Policy.

Step 1:

Workplace participants may raise a complaint with any Grievance Officer, or through their direct line manager or manager once-removed.

Under the Grievance Procedure, complaints may be managed formally or informally, depending on (among other things) the nature of the complaint.

Step 2:

The Grievance Officer determines the appropriate option for handling the complaint. The manner in which a grievance will be handled is at the discretion of 29Metals's Grievance Officers, taking into account the nature and circumstances of the complaint and such other matters as the Grievance Officer considers appropriate.

The Grievance Officer may consider the wishes of the person making the complaint when determining how to manage the complaint.

Step 3:

Option 1 – Counsel and advice

If a workplace participant feels comfortable doing so, they are encouraged to address the issue directly with the person concerned.

The role of the Grievance Officer is to provide support and advice to the complainant regarding the approach to addressing the issue directly, including ensuring that the complainant properly identifies the offending behaviour, explains that the behaviour is unwelcome or offensive (for example) and ask that the behaviour ceases.

It is important that the complainant is cognisant that the other party may not be aware that the relevant behaviour was unwelcome or caused offence.

Option 2 – Referral of the complaint

A complainant may wish to formally refer a complaint to:

- a Grievance Officer; or
- in the case of an employee complainant:
 - to the employee's manager; or
 - the employee manager once-removed,

to be managed in accordance with the Workplace Behaviour Policy, or via the Company's Whistleblower Service (refer to 29Metals' Whistleblower Policy available on the Company's website for details). In any case, the complaint will be investigated appropriately.

Complaints via the Company's Whistleblower Service will be managed in accordance with the Company's Whistleblower Policy and the arrangements with the service provider and may result in referral of the complaint to a responsible officer in the Company in any case.

A complaint may be reported to a Grievance Officer, the complainant's manager, manager-once-removed or any General Manager or member of the Executive Leadership Team of 29Metals.

The Grievance Officer is responsible for assessing the complaint and determining what action should be taken, including whether options 3 and 4 (below) are warranted.

Option 3 - Informal Complaint Procedure

29Metals encourages informal resolution of Grievance in the first instance, except where the nature of the allegations or the circumstances in which they are said to have occurred make it inappropriate to do so.

Informal options include, but are not limited to:

- the Grievance Officer or a senior representative of 29Metals (such as an Executive) discussing the issue with the person against whom the complaint is made; and/or
- the Grievance Officer facilitating a meeting between the parties in an attempt to resolve the issue and agree on a way to work together in future.

29Metals may use the services of an external mediator in appropriate cases.

The informal complaint procedure is more suited to less serious allegations that, if substantiated, would not warrant disciplinary action being taken. It may also be more suitable where parties are likely to have ongoing contact with each other and need to maintain a working relationship.

Option 4 - Formal Complaint Procedure

The formal complaint procedure involves a formal investigation of the complaint.

Formal investigations may be conducted by a Grievance Officer or a person from outside the Company appointed by 29Metals to investigate.

An investigation generally involves collecting information about the complaint and then making a finding based on the available information as to whether the alleged behaviour occurred.

Once a finding is made, the Grievance Officer or the external investigator will make recommendations about resolving the complaint.

If 29Metals considers it appropriate for the safe and efficient conduct of an investigation, workplace participants may be required to not report for work during the period of an investigation. 29Metals may also provide alternative duties or work during the investigation period. Generally, employees will be paid their normal pay during any such period.