

CODE OF CONDUCT



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1. Purpose

The purpose of this document (“**Code**” or “**Code of Conduct**”) is to outline the standards of conduct and core values that guide the way we work at Mint Innovation Limited and its subsidiaries (together referred to as “**Mint**” or the “**Company**” in this code of conduct).

It sets out the expectations for professional and ethical behaviour that apply to all Mint people, including permanent and fixed-term employees, directors, contractors, secondees, and anyone acting on behalf of Mint (collectively “**Mint Representatives**”). These standards apply across all our working environments: whether on site, in a lab, working remotely, visiting a third party, or representing Mint in any capacity.

This document is designed to:

- Provide a clear framework for decision-making and actions aligned with Mint’s values, responsibilities, and legal obligations;
- Reinforce our commitment to acting lawfully, ethically, respectfully, and responsibly;
- Help every individual understand the minimum standards of behaviour expected in their role, and how these expectations reflect and uphold Mint’s values;
- Support a culture of integrity, fairness, transparency, safety, and collaboration in all our interactions, with colleagues, customers, suppliers, regulators, and communities.

This Code should be read in conjunction with all other applicable Mint policies and procedures. It complements and is underpinned by our Company values, which are actively championed by our leadership team and embedded in how we operate, hire, develop, and engage across the business.

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2. Scope & Accountability

Mint's senior executives are responsible for actively instilling and reinforcing Mint's values and standards across all parts of the business. This includes ensuring that employees understand how these values shape day-to-day behaviour, and that appropriate training and communication are in place to support consistent understanding and alignment. Leaders are expected to lead by example and embed these values and standards in every interaction and decision.

Managers and supervisors have a critical role in the practical application of this Code. They are accountable for conducting themselves in a manner consistent with Mint's expectations and for promoting the Code within their teams. This includes ensuring the Code is understood, applied, and upheld by all employees under their supervision. Managers are also responsible for fostering a working environment where ethical behaviour is recognised, encouraged, and expected.

All employees, directors, and members of management are expected to carry out their duties in accordance with this Code. Everyone has a responsibility to act with integrity, report suspected breaches of ethical conduct or corrupt behaviour, and to speak up about any known or potential departures from the Code, whether involving themselves or others.

Authorised Officers include the CEO, Company Secretary, Board, and Global President.

3. Statement of Values

Vision: Be the world's leading provider of circular green metals to help restore our planet.

Mission: We relentlessly pursue the development of innovative clean technologies that extract green metals from the world's waste - and make these widely accessible.

Commitment: Our work is guided by a commitment to environmental responsibility, scientific excellence, and long-term impact.

- **Protecting the environment and biodiversity** through the development and operation of low-carbon, closed-loop recovery systems that return metals to local supply chains.
- **Delivering long-term value to shareholders** by building a resilient, scalable business that is commercially strong and environmentally responsible.
- **Operating with integrity, efficiency, and care**, embedding responsible systems and practices in every part of our work, from advanced manufacturing to strategic decision-making.
- **Engaging meaningfully with stakeholders**, including customers, partners, communities, and regulators, to enable sustainable development and transparent growth.
- **Promoting a culture of safety, wellbeing, and accountability**, applying best practices in occupational health and risk management, and expecting the same standards from our business partners.
- **Upholding all applicable environmental, safety, and industry regulations** in every region we operate, and seeking to exceed compliance wherever we can.
- **Continuously improving our environmental performance**, finding new ways to expand our clean technology platform into additional waste streams and maximise recovery outcomes at scale.

This commitment is lived through our people, our partnerships, and our science, and is reflected in everything we design, build, and scale.

4. Conduct & Behaviour

We expect everyone at Mint to uphold high standards of personal and professional behaviour. Whether you're working in the lab, collaborating online, or representing Mint externally, your conduct should reflect professionalism, care, and sound judgment.

Each of us plays a role in shaping a respectful, high-performing work environment. The way we make decisions, provide feedback, navigate challenges, and engage with others, forms the foundation of trust, both within our teams and in our relationships with external partners.

As part of this, you are expected to:

- **Act with integrity** — be honest, transparent, and reliable in your actions and decisions. If something's not right, speak up.
- **Work responsibly** — carry out your duties to a high standard, with attention to safety, quality, and accuracy.
- **Follow the law** — operate within the legal and regulatory frameworks relevant to your role and location.
- **Respect our policies** — these exist to support safe, fair, and consistent ways of working.
- **Communicate professionally** — in meetings, written communication, or public settings, be respectful, constructive, and clear.
- **Handle confidential information with care** — only share what you are authorised to share, and protect sensitive data as part of your day-to-day responsibilities.
- **Represent Mint well** — when engaging with customers, collaborators, suppliers or the public, remember you are acting on behalf of the business.

These behaviours are fundamental to how we work together, and how we are seen as a business. They apply across all locations and roles, whether you're onsite or working remotely.

5. Health & Safety

At Mint, safety is everyone's responsibility, not just something we comply with, but a core part of how we work. Our commitment to health, safety, and wellness is outlined in our Health, Safety & Wellness Policy, and it applies to all working environments, labs, offices, production sites, and remote locations.

All team members are expected to:

- **Actively uphold safety standards** – follow all safety instructions, procedures, and guidance provided by your manager or site lead.
- **Use equipment responsibly** – make proper use of all safety, security, and protective equipment provided by Mint.
- **Raise concerns early** – if you notice something that could cause harm or disruption – whether it's a hazard, near miss, or suspicious behaviour – speak up using the incident reporting process.
- **Minimise risk** – be mindful of your own impact, and take practical steps to keep your working area safe for you and those around you.

Safety at Mint isn't just about compliance – it's about protecting our people, our science, and the environment we work in.

6. Equal Treatment

At Mint, we are committed to equal and respectful treatment. We respect the fundamental rights of people worldwide. When dealing with colleagues, customers and business partners, we respect the personal dignity, privacy and personal rights of every individual. We do not tolerate any unlawful unequal treatment, insults and (sexual) harassment. Misconduct will be punished accordingly. For us, equal opportunities and tolerance are essential elements of successful cooperation.

Refer to the **Equal Opportunity Employer Policy** and **Bullying & Harassment Policy** for more information.

7. Fair Working Conditions

At Mint, we offer our employees appropriate remuneration and fair working conditions that, at a minimum, meet local legal requirements, e.g., regarding working hours. The legally guaranteed minimum wages in the respective labour markets are regularly exceeded.

Within our sphere of influence, we respect the internationally established human rights of all individuals. Declaration of Human Rights in accordance with the UN Guiding Principles on Business and Human Rights and the 10 principles of the UN Global Compact. We, therefore, reject any form of forced labour and child labour and are fundamentally opposed to any form of forced or compulsory labour. We respect collective rights guaranteed by law. We also expect this understanding and strict compliance from our business partners.

Refer to the **Modern Slavery Policy** for more information.

8. Sustainability

At Mint, sustainability isn't just something we do – it's why we exist. As a cleantech company, our core contribution to a more sustainable future is the responsible scale-up and deployment of our proprietary technology that recovers critical metals from complex waste.

We are committed to minimising our environmental footprint while maximising our positive impact on people and the planet. That includes responsible resource use, ethical waste handling, and transparent governance, wherever we operate.

As part of this commitment, all Representatives are expected to:

- Operate in a way that minimises environmental impact and complies with local and international regulations in the countries where we operate.
- Support the safe and compliant handling, transport and downstream management of electronic waste and hazardous materials, in line with site-specific procedures and local laws.
- Uphold Mint's environmental and safety standards at all sites, including recordkeeping, reporting and material traceability, consistent with frameworks such as R2v3 where applicable.
- Respect the communities we operate in, including being aware of how our operations may affect health, safety, and the environment.
- Comply with any sustainability-related certifications, permits or standards required in their roles or jurisdictions.

We aim to meet evolving global sustainability disclosure standards, and we are actively monitoring developments and adjust our own expectations and practices as required. All Representatives have a role to play in ensuring that Mint's sustainability values are upheld in their work, decisions, and conduct.

9. External Communication

At Mint, we take pride in the work we do and the impact we're creating. Naturally, our people may want to share that pride, whether with friends and family, on social media, or through other external channels. While we encourage enthusiasm for Mint's mission, it's important that all external communication is accurate, aligned with our brand, and does not compromise confidentiality, consistency, or stakeholder trust.

a) Sharing the Right Message

To protect our people, our technology, and our strategic position, all employees must take care to share only what is appropriate and approved for public disclosure. We also want to ensure that how we describe Mint, in language, tone, and positioning, is consistent and aligned across all platforms.

Some key examples of the way we talk about Mint include:

- We are a **clean technology company** – this reflects our market positioning.
- We are **pioneering circular green metals** – highlighting our leadership and first-mover advantage.
- We have developed a **proprietary technology** to recover critical and valuable metals from e-waste – unique, protected, and innovation-led.
- We operate an **advanced manufacturing facility**.
- We use **a naturally occurring biomass and smart chemistry processes** to extract metals sustainably.
- We have discovered a **world-first solution to a complex global problem**.
- Our **focus on printed circuit boards** has enabled commercialisation, and we are expanding our platform to recover additional metals at scale, such as from lithium-ion batteries.

All external messaging should align with Mint's **Brand Messaging Framework**, and any social content should comply with the **Social Media Policy**. These documents work together to guide what can, and cannot, be communicated publicly.

b) Authority to Speak on Behalf of Mint

Employees must not make official statements or speak publicly on behalf of Mint unless they are:

- Authorised to do so by the CEO or the Board;
- Giving evidence in court; or
- Required to do so by law.

Any request for official comment or media engagement must be referred to the **Marketing team**. If you are approached by a journalist, external organisation, or third party for comment, always redirect them accordingly.

Employees are also prohibited from sharing unpublished, confidential, or privileged information unless explicitly authorised by the CEO or the Board. These restrictions do not apply where disclosure is legally protected, for example, under whistle-blower protections.

c) Personal Expression vs. Professional Responsibility

Mint respects the rights of all individuals to express personal opinions on social, political, or community issues in their private capacity. However, when identifying as a Mint employee (including in bios, job titles, or tagged content), individuals must ensure their views cannot be interpreted as those of the Company, unless authorised.

If in doubt, seek guidance from your manager or the Marketing team before sharing information externally.

10. Use of Company Resources

Mint provides tools, equipment, and resources so we can all do our jobs effectively and contribute to our shared mission. These resources are essential to supporting safe, productive, and purposeful work across all our environments, from lab and plant facilities to remote offices.

Any request to use Mint equipment, systems, or facilities outside of core business hours must be approved in advance by the People Operations team.

Where approval is granted, the individual is responsible for using those resources appropriately. This includes following any specific conditions, safeguarding the equipment, and ensuring it is maintained and returned in good working order.

Company resources must not be used for personal commercial activity. Unauthorised use, including use without approval, misuse, or damage, may result in disciplinary action and, in serious cases, legal consequences.

11. Confidentiality, Data Protection & Information Security

At Mint, we all have a responsibility to protect confidential, sensitive, and proprietary information, not only to maintain trust, but to safeguard our technology, people, and commercial advantage. We all share responsibility for ensuring that this information is handled carefully, stored securely, and never disclosed inappropriately.

All Mint information should be treated as confidential unless clearly stated otherwise. This includes any data, documents, communications, or materials created, accessed, or shared in the course of your work. Employees must ensure that confidential and sensitive information is only shared with people who are authorised to receive it and never disclosed externally without express approval from the People Operations team, Executive team member or Authorised Officer. The unauthorized disclosure or transfer of confidential information is prohibited both internally and externally in accordance with all applicable laws.

We use Microsoft 365 as our primary platform for secure file storage and collaboration, and our **ICT Policy** outlines the tools and behaviours required to maintain information security across the Company. Sensitive information, whether physical or digital, must be protected at all times, including through secure storage when unattended or outside of working hours.

This responsibility also applies to confidential third-party information shared with Mint. Such information must not be disclosed without written permission from the third party involved.

These expectations are also reinforced through the confidentiality provisions in all Mint employment and contractor agreements, and supported by our **Trade Secrets Policy**, which governs the handling of non-public, proprietary, and commercially sensitive information.

Any unauthorised access, use, or disclosure of Mint information is considered a serious breach of this Code and may result in disciplinary action, up to and including termination of employment, and, in some cases, legal consequences. Breaches of data or information security must be reported to the IT team or an Authorised Officer without delay

12. Intellectual Property

Mint exists to solve complex global challenges through science, technology, and innovation. As such, our intellectual property, including scientific discoveries, technical designs, trademarks, inventions, commercial designations, and proprietary processes, is one of our most valuable assets.

Intellectual property (“IP”) includes, but is not limited to, scientific discoveries, technical and industrial designs, trademarks, inventions, proprietary processes, commercial identifiers, and any materials developed in the course of employment. All IP created by employees or contractors during their time with Mint belongs to the Company, unless a separate written agreement has been made in advance.

Employees must not use, share, or reproduce Mint-owned intellectual property outside the scope of their role unless they have obtained written approval from the Group Legal Counsel or Company Secretary. This applies to all uses, including for external research, personal projects, or commercial purposes.

Much of Mint’s IP also includes highly sensitive, non-public information, including methods, processes, data, and know-how, which qualifies as trade secrets. These trade secrets are governed by our **Trade Secrets Policy**, which sets out how this information must be protected and handled. All employees are expected to be familiar with and comply with the obligations set out in that policy.

If you are unsure whether something constitutes intellectual property or a trade secret, or if you are seeking to use Mint IP in a way that is not part of your day-to-day role, please speak with an Authorised Officer before taking any action.

13. Conflict of Interest

At Mint, we expect all team members to act with integrity and in the best interests of the business. A conflict of interest arises when your personal, financial, or professional relationships could improperly influence, or be perceived to influence, your decisions or actions at work.

Conflicts don't always involve wrongdoing, but how they're identified and managed matters. Undisclosed or unmanaged conflicts can affect judgement, fairness, and trust, and in some cases, may constitute corrupt conduct.

Examples of potential conflicts include:

- Holding a financial interest in a company that Mint works with – including where friends or relatives stand to benefit.
- Sitting on a board, advisory group, or in a leadership role in another organisation that overlaps with Mint's work.
- Having a close personal relationship with someone you are doing business with on behalf of Mint.
- Running a side business or other external employment that affects your time, judgement, or access to confidential information.
- Using information or insights gained through your role at Mint for personal advantage.
- Offering, requesting, or receiving an inducement, bribe, or incentive intended to influence a decision or process.

Personal interests must not unduly influence our professional judgment. We disclose actual and potential conflicts of interest in accordance with our internal guidelines and conduct a neutral evaluation to ensure our employees are not engaged in conflicted relationships. You are often best placed to recognise a potential conflict – and it is your responsibility to raise it. If you're unsure, disclose it early and seek guidance.

All potential or actual conflicts of interest must be reported to the People Operations team or an Authorised Officer as soon as they arise. If you're not sure whether something could be perceived as a conflict, it's always better to check.

We strictly reject all forms of corruption, whether active or passive, and take appropriate measures in our area of responsibility to ensure that the applicable anti-corruption laws are strictly adhered to. We do not accept bribes (e.g., when making supplier decisions) and we do not bribe others (e.g., to obtain orders or other advantages). This prohibition applies not only to members of government and public officials, but also to employees (and persons close to these groups) of business partners and colleagues, both at home and abroad. You must not offer, accept, or solicit any bribe or improper benefit. Any such offer must be reported immediately. For more information, refer to our **Anti-Bribery & Corruption Policy**.

14. Legislation

It is essential that all employees comply with the laws and regulations of the countries in which we operate. Violations of such laws may have serious consequences for Mint and any individuals concerned. Any known violation must be reported immediately to management.

Where R2v3, ISO, NIST certifications or similar standards apply to Mint operations, all Representatives must support the implementation of compliant practices, including data security, EHS controls, responsible downstream management, and accurate recordkeeping. These responsibilities may vary by site and role, and specific guidance will be provided where applicable.

15. Fair Dealing

Mint aims to succeed through fair and honest competition and not through unethical or illegal business practices. Each employee should endeavour to deal fairly with the Mint's suppliers, customers and other employees.

Every Mint employee is obliged to comply with the relevant laws against restraints of competition; a dominant market position may not be illegally exploited. It is prohibited to enter into formal or informal agreements with competitors - including potential competitors - which have as their object or actual effect the unlawful hindering of competition. This also applies to tacit, deliberately concerted practices. Agreements reached between competitors on the allocation of territories or customers as well as the exchange of information on prices, supply relationships, terms and conditions, capacities, market shares, margins, costs, special customer information and the content or conduct of offers are, therefore, prohibited.

16. Insider Trading

All employees must observe the **Securities Trading Policy**. In conjunction with the legal prohibition on dealing in Mint's securities when in possession of unpublished price sensitive information, Mint has established specific time periods when Directors, management and employees are permitted to buy and sell the Mint securities.

17. Responsibilities to Investors

Mint strives for full, fair and accurate disclosure of financial and other information on a timely basis. Refer to the **Continuous Disclosure Policy** and **Shareholder Communications Policy**.

18. What we don't do

At Mint, treating people with respect and behaving in ways which contribute to a safe and positive working environment for all employees is important to us. We aim to provide a safe and respectful environment that is free from all forms of bullying, harassment, victimisation, and discrimination. Please read our full **Bullying and Harassment Policy** in conjunction with our Code of Conduct.

19. Breaches of the Code of Conduct

Employees should note that breaches of certain sections of this Code of Conduct may be punishable under applicable legislation. Breaches of this Code of Conduct may lead to disciplinary action. Any material breaches of the Code of Conduct will be reported by the Company Secretary to the Board.

20. Reporting

Employees are encouraged to raise any matters of concern in good faith with the head of their business unit, the Legal Department or with the Company Secretary, without fear of retribution.

In addition, employees are encouraged to raise any serious wrongdoing (as defined in the **Protected Disclosure Policy**) with the relevant recipient(s) set out in the **Protected Disclosure Policy**.

21. Need more information?

Contact the People Operations team.