

Code of Conduct Policy



Purpose

This code of conduct aims to foster the appropriate standards of conduct and behavior of the directors, officers, employees, and contractors (collectively called the “personnel”) of the Company.

Personnel are expected to act with integrity and objectivity, striving at all times to enhance the reputation and performance of the Company.

General Principles

All personnel must:

- Act honestly, in good faith, and in the best interests of the Company as a whole.
- Exercise due care and diligence in fulfilling the functions of their position and exercising the powers attached to their employment.
- Recognize that their primary responsibility is to the Company’s shareholders as a whole.
- Not to exploit their position for personal gain or the gain of their associates.
- Directors should be independent in their judgments
- Treat confidential information received by personnel in the course of the exercise of their duties remains the property of the Company. Confidential information can only be released or used with specific permission from the Company.
- Personnel must comply with the spirit as well as the letter of the law and with the principles of this code, upholding the Company’s values and ethical standards in all interactions.

The Company views breaches of this code as serious misconduct. Personnel who have become aware of any breaches of this code must report the matter immediately to their line manager or the Company Secretary. The line manager or Company Secretary has the responsibility to report the breach to the appropriate senior management and to advise the relevant employee of the outcome and actions implemented.

Any employee who, in good faith, reports a breach or a suspected breach will not be subject to any retaliation or recrimination for making that report.

Personnel who breach the policies outlined in the Code may be subject to disciplinary action, including, in the case of serious breaches, dismissal.

Directors

The following additional comments apply to directors of the Company and aim to ensure directors have a clear understanding of the Company’s expectations of their conduct.

Fiduciary Services

Holding a position of trust, Directors have a fiduciary relationship with the Company's shareholders. Improper use of their position of trust with shareholders, which makes it unlawful for directors to improperly use their position to gain an advantage for themselves.

Duties of Directors

Each director must endeavor to ensure that the Company is properly managed so as to protect and enhance the interests of all shareholders. To this end, directors need to devote sufficient time and effort to understand the Company's operations.

Directors should ensure that shareholders and the ASX are informed of all material matters that require disclosure and avoid or fully disclose conflicts of interest.

Directors should proactively manage any conflicts of interest in accordance with the Company's Code of Conduct Policy, Conflict of Interest.

Conflict of Interest

At all times, a director must be able to act in the interests of the Company. Where the interests of associates, the personal interest of a director, or a director's family may conflict with those of the Company, then the director must immediately disclose such conflict and either:

- Eliminate the conflict, or abstain from participation in any discussion or decision-making process related to the subject matter of the conflict.
- Executive directors must always be alert to the potential for a conflict of interest between their roles as executive managers and their fiduciary duty as directors.

Insider Trading

Information concerning the activities or proposed activities of the Company, which is not public and which could materially affect the Company's share price, must not be used for any purpose other than valid Company requirements.

CEO and CFO

It is the responsibility of both the CEO and the CFO to provide written assurances to the Board that in all material respects:

- Financial reports submitted to the Board represent a true and fair view of the Company's financial condition and operational results; and
- The company's risk management and internal compliance and control system is operating efficiently and effectively.

Stakeholders

The Board recognizes shareholders as the primary stakeholders in the Company alongside employees, customers, and the wider public, or the general community.

The Company's primary objective is to create shareholder wealth through capital growth and dividends, through the continued development of its business, and the provision of innovative solutions within the relevant and related industry. This is achieved by:

- Keeping the market informed of the progress of its key business units;
- Actively progressing its business development pipeline and other development activities; and
- Seeking new opportunities that add value and complement existing business activities.

The Company is committed to conducting all its operations in a manner that:

- Protects the health and safety of all employees, personnel, contractors, and community members;
- Recognizes, values, and rewards the individual contribution of each employee;
- Maintains positive relationships with customers, suppliers, partners, and regulators; and
- Is honest, lawful, and ethical in all business dealings.

All personnel (including directors) are expected to act with the utmost integrity and objectivity, striving at all times to enhance the Company's reputation and performance.

Members of the Board are informed of any material breaches of the Code of Conduct promptly by the Company Secretary or senior management.

This policy is reviewed annually.