



Code of Conduct

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1. INTRODUCTION

Fulcrum Lithium Ltd (the **Company**) identifies its responsibilities as a junior exploration company in respect of environmental and other industry related issues in Australia and the USA and also recognises its obligations to native title owners and other land owners. The Company is a business adopting the highest standards of ethical conduct in accordance with the core principles encapsulated in this Code of Conduct (**Code**).

2. APPLICATION OF THE CODE

We recognise that our reputation is one of our most valuable assets and is founded largely on the ethical behaviour of the people who represent the Company. This Code applies to all directors, employees, contractors and consultants of the Company (**Company Personnel**) and compliance with this Code, the Company's policies and applicable laws is a condition of working with the Company and will serve to enhance our reputation for fair and responsible dealings and promote high standards of behaviour across our business.

3. GOOD CORPORATE CITIZENSHIP

We recognise that our shareholders, customers and consumers, employees and the communities where we operate rightly expect us to demonstrate corporate responsibility leadership. We do this by:

- (a) observing the letter and spirit of all relevant laws;
- (b) implementing appropriate Health Safety and Environment policies, practices and procedures with the objective of zero injury to our employees and zero harm to the environment and our communities from our operations; and
- (c) adhering to applicable ASX Principles of Good Corporate Governance.

4. INTEGRITY, HONESTY AND FAIRNESS

We are committed to conducting business with integrity, honesty and fairness.

Company Personnel are expected to:

- (a) deal fairly and honestly with customers, suppliers and the community;
- (b) understand and comply with legal requirements and Alpha HPA policies;
- (c) avoid actual or potential conflicts of interest and declare any actual or potential conflicts that may arise;
- (d) never give or receive bribes or kickbacks or any other similar inducements;
- (e) decline gifts or other benefits that will compromise their independence;
- (f) only trade in the Company's securities in the approved "trading windows" and in accordance with the Company's Securities Trading Policy;
- (g) maintain the confidentiality of business information that they have access to in their work;
- (h) respect the privacy of individuals and the privacy laws in relation to the collection, use and handling of other people's personal information;
- (i) use the Company's information and communication tools in an effective, ethical and lawful manner; and

- (j) protect the Company's property and the belongings of others from theft, misappropriation and misuse.

5. EMPLOYMENT PRACTICES

We value and respect the diversity of our employees and are committed to creating an inspiring workplace where everyone is treated equally and fairly, in which no-one is discriminated against in any way on the basis of characteristics such as gender, age, race, religion, sexual orientation or marital status, and in which no-one is subject to or commits any act of harassment.

We will:

- (a) not tolerate any form of discrimination or harassment in the workplace;
- (b) provide employees with performance management processes that will be applied fairly and honestly;
- (c) recognise achievement and communicate what needs to be done to those who have not performed to expectations; and
- (d) ensure that there are systems and procedures in place to ensure that employees are fit for work and understand their obligations in relation to consumption of alcohol, drugs and prescription medications.

6. TRADING ACTIVITIES

We support the principles of free competition and will observe the spirit and letter of competition laws. You should exercise high standards of ethical conduct in all business dealings including those with suppliers, customers and consumers regarding our marketing and selling activities, our use of market power, our description of goods and services and the quality and safety of our products.

Company Personnel are expected to:

- (a) never say or do things that are likely to mislead or deceive people; and
- (b) ensure that all of our products and services that we supply to customers, consumers and the community meet the Company's high quality and safety standards as well as those standards required by law.

7. SEEKING ASSISTANCE

If you have any questions that are not specifically addressed in this Code or any of the Company's policies referred to in this Code, please ask your senior, the Company Secretary or a Director for advice.

Any breach of this Code is a serious matter that may give rise to disciplinary action including dismissal and legal action. If you are aware of any serious misconduct or unethical behaviour that contravenes this Code, any of the Company's policies or the law, you should report this to your senior, the Company Secretary or a Director.

Any employee who makes a report in good faith will be treated with respect and will not be subject to any retaliation.

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