

NEO

ENERGY METALS

NEO

ETHICS & INTEGRITY

CODE OF CONDUCT POLICY

Policy P002 | Approved 17 September 2026

OUR POSITION

Neo Energy Metals plc expects lawful, honest and responsible conduct from directors, employees, contractors and business partners. The Code establishes minimum standards for ethical behaviour, protection of people and assets, responsible market conduct and prompt reporting of misconduct.

PUBLIC WEBSITE EDITION

Our commitment

	MINIMUM STANDARD	
	This Code sets the minimum standards of ethical, lawful and responsible conduct expected throughout Neo Energy Metals plc and its subsidiaries.	
ACT LAWFULLY	ACT WITH INTEGRITY	SPEAK UP
Comply with applicable laws, listing requirements, permits and Company policies.	Act honestly, fairly and professionally, and avoid conduct that could damage Neo or stakeholder confidence.	Report suspected misconduct promptly. Good-faith reporters and persons assisting investigations must not face retaliation.

Who this applies to

This Code applies to all directors, officers, employees, contractors, consultants and, where relevant, suppliers, agents and business partners. Everyone covered by the Code must understand and comply with it, complete required training and report concerns promptly.

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This website booklet presents the approved Code of Conduct Policy in an accessible public-facing format. The substantive policy wording has been retained.

FOUNDATION

Purpose, scope, responsibilities and core conduct standards

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PURPOSE

This Code sets the minimum standards of ethical, lawful and responsible conduct expected throughout Neo Energy Metals plc and its subsidiaries (the Company). It supports good governance, responsible mining and the protection of the Company's people, assets, reputation and stakeholders.

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SCOPE AND RESPONSIBILITIES

This Code applies to all directors, officers, employees, contractors, consultants and, where relevant, suppliers, agents and business partners. Everyone covered by the Code must understand and comply with it, complete required training and report concerns promptly.

The Board oversees the Company's ethical culture and compliance framework. Executive management implements the Code, and relevant Board committees oversee matters within their mandates.

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CORE STANDARDS OF CONDUCT

All persons covered by this Code must:

1. act honestly, fairly, professionally and in the best interests of the Company;
2. comply with applicable laws, listing requirements, permits and Company policies;
3. treat colleagues, communities, regulators, investors and business partners with dignity and respect;
4. protect health, safety, the environment, Company assets and confidential information; and
5. avoid conduct that could damage the Company's reputation or stakeholder confidence.

CORE EXPECTATION

Lawful conduct, professional integrity and responsible stewardship are minimum expectations for everyone covered by the Code.

INTEGRITY & MARKET CONDUCT

Bribery, conflicts, securities dealing and external communications

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BRIBERY, GIFTS AND CONFLICTS OF INTEREST

The Company prohibits bribery, corruption, facilitation payments, kickbacks and any improper advantage. Gifts, hospitality, donations and sponsorships must be lawful, reasonable, transparent, accurately recorded and approved where required. Cash gifts, excessive hospitality and benefits intended to influence a decision are prohibited.

Actual, potential or perceived conflicts of interest must be avoided and disclosed promptly to the appropriate line manager, the Chief Governance and Legal Officer, the Company Secretary or the Board. Company positions, information and opportunities may not be used for improper personal benefit.

PROHIBITED

Cash gifts, excessive hospitality and benefits intended to influence a decision are prohibited.

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MARKET CONDUCT AND EXTERNAL COMMUNICATIONS

No person may deal in securities while in possession of inside information, unlawfully disclose inside information, encourage another person to deal, manipulate the market or otherwise misuse price-sensitive information. The Company's securities dealing, insider-list and disclosure procedures must be followed.

Only authorised persons may communicate with investors, analysts, the media, regulators, exchanges or the public on behalf of the Company. External communications must be accurate, balanced and not misleading. Potentially price-sensitive matters must be escalated immediately.

MARKET CONDUCT

Potentially price-sensitive matters must be escalated immediately and only authorised persons may communicate externally on behalf of the Company.

PEOPLE, SAFETY & COMMUNITIES

Health, safety, environment, human rights and respectful conduct

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HEALTH, SAFETY, ENVIRONMENT AND COMMUNITIES

Health, safety and environmental obligations take priority over production, financial or operational objectives. All persons must follow applicable laws and site procedures, use required protective equipment, stop unsafe work and report hazards, incidents, near misses, spills and environmental non-compliance.

The Company respects human rights and seeks constructive, transparent relationships with host communities and other stakeholders. Forced labour, child labour, exploitation and unauthorised commitments to communities or regulators are prohibited.

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PRIORITY

Health, safety and environmental obligations take priority over production, financial or operational objectives.

RESPECTFUL WORKPLACE

The Company is committed to dignity, fairness, equal opportunity and professional conduct. Discrimination, harassment, bullying, intimidation, victimisation, retaliation, threatening behaviour and other abusive or inappropriate conduct are prohibited.

DIGNITY

Treat people with dignity and respect.

FAIRNESS

Support equal opportunity and professional conduct.

NO RETALIATION

Victimisation, intimidation and retaliation are prohibited.

ASSETS, INFORMATION & THIRD PARTIES

Responsible use of resources, records, counterparties and technology

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COMPANY ASSETS, INFORMATION AND RECORDS

Company funds, equipment, systems, intellectual property, information, permits, business opportunities, name and reputation must be used responsibly and only for legitimate business purposes.

Confidential, personal and inside information may only be accessed, used or disclosed for authorised purposes and must be protected against loss, misuse or unauthorised disclosure.

All financial, operational, safety, environmental and compliance records must be accurate, complete and timely. Falsifying records, concealing information, making unrecorded payments or interfering with audits or investigations is prohibited.

8.1

THIRD PARTIES AND FINANCIAL CRIME

Suppliers, contractors, agents and business partners must be selected through risk-based due diligence and are expected to comply with applicable laws and standards on anti-bribery, sanctions, human rights, health, safety, environment, confidentiality and conflicts of interest.

The Company will not knowingly deal with sanctioned or prohibited persons or parties involved in money laundering, terrorist financing, fraud, corruption, illegal mining or other unlawful activity. Concerns must be escalated immediately.

8.2

TECHNOLOGY, SOCIAL MEDIA AND POLITICAL ACTIVITY

Company technology must be used lawfully, securely and responsibly. No person may compromise cybersecurity, access or transmit unlawful or offensive material, disclose confidential information through unauthorised channels or make unauthorised public comments on behalf of the Company.

The Company does not make political donations unless lawful and approved by the Board. Dealings with public officials and regulators must be transparent, lawful and properly recorded; no benefit may be offered to obtain an improper advantage.

SPEAKING UP & ACCOUNTABILITY

Protected reporting, consequences, training and review

8.3

SPEAKING UP AND NON-RETALIATION

Suspected misconduct, fraud, corruption, conflicts, harassment, unsafe conditions, environmental incidents, regulatory breaches or other violations of this Code must be reported promptly to a line manager, Human Resources, the Chief Governance and Legal Officer, the Company Secretary, the Chief Executive Officer, the Chair of the Audit and Risk Committee or the independent Speak Up channel.

Reports may be made confidentially and, where permitted, anonymously. Retaliation against a person who raises a concern in good faith or assists an investigation is prohibited.

NO RETALIATION

Retaliation against a person who raises a concern in good faith or assists an investigation is prohibited.

8.4

BREACHES, TRAINING AND REVIEW

Breaches may result in disciplinary action, dismissal, termination of contract, recovery of losses, reporting to regulators or law enforcement, and civil or criminal proceedings. The Company will provide proportionate training and may require written confirmation of compliance. This Code will be reviewed at least annually and updated when necessary.

Policy information

Document name	Code of Conduct Policy
Reference number	P002
Document author	Frederik Brand: Chief Governance and Legal Officer
Document owner	Governance and Legal Division
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Lawful. Ethical. Responsible.