



Code of Conduct

Message from our CEO - Rob Cooper

Our Code of Conduct sets standards of behaviour that Round Oak Minerals (Round Oak) expects from all our people at all of our operations and other locations. We continually endeavour to develop and maintain systems and business processes that reflect our performance culture as embodied in the Code of Conduct.

Everyone working for, and with Round Oak, needs to ensure they are familiar with this Code of Conduct and are committed to the required standards. In doing so, will support an organisational culture of which we can all be proud to be a part of.

Scope

This Code applies to all Round Oak employees, as well as all persons who work for, with, act on behalf of, or represent Round Oak. This includes subsidiary employees, contractors, volunteers and anyone working on any Round Oak sites, offices or other locations requested by the Company.

Supervisors and Managers also have a specific responsibility for ensuring that all employees understand the standards of behaviour expected of them, and their responsibility in taking action when behaviour does not meet expectations.

This Code applies to conduct that occurs:

- in connection with work, even if it occurs outside of normal working hours;
- during work activities, for example, when dealing with clients or other workers;
- at work related events, for example, at conferences and work-related social functions; and
- on social media, where workers interact with colleagues and their actions may affect them either directly or indirectly.

Expected Behaviour & Work Ethics

- we act with integrity, professionalism and be responsible in the use of company information, funds, equipment and facilities.
- we exercise fairness, equity, courtesy, consideration and sensitivity in dealing with employees and other stakeholders.
- we avoid real or apparent conflict of interests.
- we always promote the interests of the company.



- we perform our duties with skill, honesty, care and diligence using authority in a fair and equitable manner.
- we abide by the policies, standards, procedures, instructions and lawful directions that relate to our employment and duties.
- we comply with the performance culture within Round Oak in addition to this Code.

Unacceptable Behaviour

Behaviours that do not meet expectations include the following and will have zero tolerance applied:

- **Workplace Harassment or Bullying:**

Harassment is an action or conduct in behaviour that a reasonable person would find unwelcome, humiliating, intimidating or offensive. Bullying is a repeated behaviour directed towards an individual or group of individuals that is unreasonable and creates a risk to health, safety and well-being.

- **Discrimination:**

Discrimination occurs when a person, or a group of people, is treated less favourably than others because of their background or certain personal characteristics. *This is direct discrimination.*

It is also discrimination when an unreasonable rule or policy applies to everyone but has the effect of disadvantaging some because of personal characteristics they share. *This is indirect discrimination.*

Information, Privacy and Intellectual Property

Information obtained in the course of employment with Round Oak must not be used or disclosed to obtain financial reward or benefit, or to take advantage of another person.

Unless governed by law or otherwise agreed in writing, any intellectual property which has been created by an employee, contractor or service provider during or as a result of employment with us is the sole property of Round Oak.

Conflict of Interest & Gifts

Any situation which may constitute a conflict of interest must be promptly disclosed to your direct Manager (or another Senior Manager). Employees must avoid personal, financial or other interests which may be in conflict with their duties and responsibilities to the company. Working for another organisation or conducting a business is not permitted without the written permission from the CEO or relevant member of the senior leadership team. Round Oak also requires written permission from employees prior to receiving gifts or invitations which could be considered inappropriate or of substantial value.

Bribery and Corruption

Bribes, pay-offs or unlawful commissions are prohibited. Our employees should never give or accept or, agree to give or accept such benefits where that benefit is not legitimately due to that person and with the intention of inappropriately influencing decision making.

Communities

Round Oak operates in close proximity to, and with, the co-operation and consent of its local communities. Round Oak has undertaken that all its people, whether employed by Round Oak directly or as a contractor, will respect and uphold the relationships we build with our stakeholders.

We acknowledge the special connection of local and Indigenous people to land and waters. We seek mutually beneficial arrangements with each community of their engagement with us in the development and performance of our operations.



Employee Assistance Program

We are committed to the wellbeing of our people. Round Oak provides the services of a third-party managed Employee Assistance Program (EAP) to provide confidential and professional counselling to all our people and their immediate family members at no cost.

Safety at Work

We are committed to providing a safe place and systems of work. Round Oak understands and manages workplace hazards to which our people are exposed, and, provides our people with the tools and processes required to make informed decisions about the risks that are accepted or otherwise.

Everyone working at Round Oak has a reciprocal duty of care to ensure they take responsibility for their own actions and work as a team to achieve a workplace in which hazards are managed. This includes ensuring that you are fit for work, refreshed i.e. enough sleep, and are free from the influence of alcohol, illegal drugs or controlled substances and follow all safe work methods.

Compliance & Breaches of the Code

Employees, contractors and service providers must be aware of, and adhere to, Company Policies, especially those relating to Health, Safety and Environment, Risk Management, Equal Opportunity and Workplace Behaviours. In the course of their duties, everyone within Round Oak must comply with relevant legislation.

Employees have a duty to observe this Code and understand their obligations. Employees also have a duty to report suspected breaches to their direct manager or the mechanism provided under our Whistleblower process. Employees found to be in breach of the Code of Conduct may be subject to disciplinary action up to and including termination.

All reports will be treated as confidential and employees will not be disadvantaged or prejudiced in the reporting of such a complaint or disclosure.

Further Resources

Our Policies, Standards, Procedures and Forms are available online on Round Oak Connect (ROC). Please ask your manager for assistance.

