



RESOURCES

*resourcing the new economy
for a better tomorrow*

CODE OF CONDUCT

EQ RESOURCES LIMITED
ACN 115 009 106

eqresources.com.au

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1. INTRODUCTION

- 1.1. EQ Resources Limited (the “**Company**”, **we**”, “**our**”, “**us**”) is committed to the highest standards of honesty and ethical practices in all aspects of the Company’s operations, free from all forms of discrimination, bullying, and sexual harassment.
- 1.2. Employees must treat others with dignity, courtesy and respect and conduct themselves in a manner consistent with current community and the Company standards and in compliance with all relevant laws.
- 1.3. The Company has also adopted the Code of Conduct (this “**Code**”) which outlines how the Company expects its employees to behave and conduct business in the workplace. It includes legal compliance and guidelines on appropriate ethical standards.

2. MINIMUM STANDARDS

- 2.1. This Code of Conduct may be amended from time to time but will always comply with the following minimum standards.
 - (a) The Company will regularly review its practices and procedures to ensure that its legal obligations are being met.
 - (b) The Company regularly monitors and tests its policies against this Code to ensure its commitments remain relevant, effective, and consistent with stakeholder expectations.
 - (c) The Company must publish this Code as amended on the Company’s website.
 - (d) All employees of the Company, and particularly Senior Management and Directors must act honestly always in the exercise of their duties.
 - (e) All employees of the Company and particularly Senior Management and Directors will act to the best of their ability given their skills and experience.
- 2.2. The Board and Senior Management endorses this Code. A condition of employment for any employee of the Company is agreeing to be bound by this Code.
- 2.3. This Code must be read in conjunction with the other relevant policies to ensure its full understanding and compliance.
- 2.4. To the extent that there is any inconsistency between this Code and the Company’s Constitution, the Constitution will prevail to the extent of that inconsistency.

3. PURPOSE

- 3.1. This Code sets out:
 - (a) the standards of ethical behaviour and good corporate governance that are required to be achieved by the Board, Senior Management and employees; and
 - (b) how the Company will engender good corporate governance practices and encourage observance of the standards of behaviour and good corporate governance set out herein.
- 3.2. This Code is not a legal document but sets out the aspirations and values of the Company to be adhered to.

4. APPLICATION

- 4.1. This Code applies to, but not be limited to:
- (a) all Company employees, officers, directors, associates, contractors, and consultants;
 - (b) job candidates, student placements, and volunteers;
 - (c) any of the Company subsidiaries and their respective personnel; and
 - (d) how the Company provides services to clients and how it interacts with other members of the public;
 - (e) all aspects of employment, recruitment and selection, conditions and benefits, training and promotion, task allocation, shifts, hours, leave arrangements, and workload;
 - (f) on-site, off-site, or after hours work; virtual/ remote working, work-related social functions; conferences – wherever and whenever Company Personnel may be as a result of their official duties
 - (g) employee treatment of other employees, of clients, and of other members of the public encountered in the course of their official duties.
- 4.2. Responsibility lies with every person covered by this Code to conduct themselves in accordance with this Code.

5. STANDARDS

5.1. Integrity, Honesty and Fairness

- 5.1.1. The Directors, Senior Management and every employee of the Company is expected to:
- (a) deal fairly with customers, suppliers and the community;
 - (b) understand and comply with legal requirements and the policies of the Company the requirements placed on the Directors under the Corporations Act 2001 (Cth);
 - (c) avoid actual or potential conflicts of interest and declare any actual or potential conflicts that arise. Those conflicts include but are not limited to financial conflicts of interest;
 - (d) take reasonable steps to avoid or manage any actual conflict or potential conflict that does arise;
 - (e) report any complaint or instance of dissatisfaction with the Company, its Senior Management or employees to the Board;
 - (f) never accept or offer any bribes or rebates or any other form of inducement or enticement, and remain mindful of the Company's **Anti-Bribery and Corruption Policy** requirements in this regard;
 - (g) decline to accept any gift which may affect their motivation to act in the best interest of the Company;
 - (h) trade only in shares of the Company in strict compliance with the Company's **Securities Trading Policy**;

- (i) maintain confidentiality with respect to all dealings of the Company and maintain the confidences of all persons the Company has dealings with; and
- (j) maintain individual's privacy and not use any personal information provided to the Company for any purpose other than for that which it was provided to the Company.

5.2. Good Corporate Citizenship

- 5.2.1. The Company recognizes that it operates in an environment which impacts on various interests in the community. In pursuing corporate responsibility, the Company will:
 - (a) always consider the environmental, sociological and economic impacts of our operations;
 - (b) implement appropriate health and safety and environmental policies (with input from the Company's Audit and Risk Committee where provided) which balance the interests of our stakeholders and the communities in which we operate but always place the health and safety of our employees and others first;
 - (c) observe the letter and spirit of relevant laws and regulations; and
 - (d) adhere to the ASX Corporate Governance Principles and Recommendations.

5.3. Workplace Fairness

- 5.3.1. The Company values its employees. The objective of the Company is to create a diverse and equitable workplace where employees feel encouraged to perform and are free from discrimination based on age, gender, race, religion, sexual orientation or marital status.
- 5.3.2. In pursuit of this objective, the Company will:
 - (a) not tolerate any act of harassment or discrimination;
 - (b) encourage the reporting of any act of harassment and deal swiftly and appropriately with those in breach of the standards to minimize harm, protecting the reporting employee if appropriate; and
 - (c) openly apply policies of performance management, recognize achievement consistent with the policies and communicate to employee's areas in which they could improve.
 - (d) promptly investigate all allegations of harassment, bullying, victimisation or discrimination and will take appropriate corrective action. Retaliation against individuals for raising claims of harassment or discrimination will not be tolerated.

5.4. Sexual Harassment

- 5.4.1. The Company has a zero-tolerance approach to sexual harassment or victimisation and is committed to taking all reasonable steps to prevent any person from engaging in acts of sexual harassment or victimisation in connection with employment or work with the Company.
- 5.4.2. Sexual harassment is a specific and serious form of harassment. It is unwelcome sexual behaviour, which could be expected to make a person feel offended, humiliated or intimidated.
- 5.4.3. Sexual harassment can take many forms, including physical, verbal, or written (including electronic).

- 5.4.4. Sexual harassment is covered in the workplace when it happens at work, at work-related events, between people sharing the same workplace, working remotely, or outside of work.
- 5.4.5. All employees and volunteers have the same rights and responsibilities in relation to sexual harassment.
- 5.4.6. Conduct does not have to be repeated or ongoing to be sexual harassment. A single incident is enough to constitute sexual harassment – it doesn't have to be repeated.
- 5.4.7. The Company will promptly investigate all allegations of sexual harassment (no matter how large or small or who is involved) and will take appropriate corrective action.

5.5. Trading Activities

- 5.5.1. The Company values fair competition and trade practices and will seek to comply with the letter and spirit of all Commonwealth and State or Territory trade practices laws where applicable. In pursuing this objective, the Company expects that:
 - (a) its employees and particularly Senior Management will exercise the highest level of honesty and integrity in all dealings with suppliers, customers and consumers in relation to marketing and selling activities, use of market power, description of goods, our relationships with suppliers and the quality and safety of our products; and
 - (b) its employees and particularly Senior Management, will never say or do anything that is likely to mislead or deceive anyone dealing with the Company.
 - (c) employees should familiarise yourself with the Company's **Securities Trading Policy** and ensure they act in accordance with it when dealing in the Company's securities.

5.6. Public Communication and disclosure

- 5.6.1. Media statements and official announcements may only be made by persons authorised under the Company's **Continuous Disclosure Policy**. If employees receive a request for information and they are not authorised to respond to the enquiry, they must refer the request to their line manager.
- 5.6.2. Unless the CEO/ MD has given prior written consent, employees must not participate in public forum discussions (including internet-based forums) where the subject matter is related to the Company, its competitors or the industry in which we operate.
- 5.6.3. The Company has adopted the **Continuous Disclosure Policy** as a means of ensuring compliance with our disclosure and communication obligations under the Corporations Act and the ASX Listing Rules. This is to ensure that information that may have a material effect on the price or value of the Company's securities, are correct from any material mistake or misinformation.

6. COMPLIANCE

- 6.1. The Company treats breaches of this Code very seriously, and may result in a disciplinary action which could include termination of employment or contractual arrangements.
- 6.2. If employees have any concerns or queries about conduct which may have breached this Code, it should be reported to a member of Senior Management. Employees making a report in good faith will be treated fairly and confidentially if appropriate. The report will be handled appropriately as the circumstances dictate to minimise harm to all parties.

7. WHAT TO DO WHEN THE CODE HAS BEEN BREACHED?

7.1. Reporting Channels

- 7.1.1. Employees are encouraged to report to their line manager any genuine unacceptable behaviour or situation which they believe breaches or potentially breaches this Code, specifically if they believe they have been discriminated against, bullied, sexually harassed or victimised.
- 7.1.2. Alternatively, employees can report unacceptable behaviour through any of the following channels:
- (a) the CEO/MD
 - (b) a director of the Company;
 - (c) the HR Manager [insert HR appropriate HR designation];
 - (d) the Company Secretary;
 - (e) the reporting channel as defined and stated in the Company's Whistleblower Policy; or
 - (f) [insert other reporting channels, if any]

7.2. Investigations

- 7.2.1. Preliminary investigations of reported breaches are administered by a relevant line manager.
- 7.2.2. If a breach of this Code is found to have occurred, a formal investigation process is administered by the CEO (or his delegate) in consultation with the line manager of the offending person.
- 7.2.3. Following the preliminary investigations, if a material breach of this Code is found to have occurred, the CEO (or his delegate) and the line manager of the offending person must report such material breach to the Board.
- 7.2.4. During the investigation process, all employees will be expected and have a duty to cooperate with any investigations initiated by the Company.
- 7.2.5. Please refer to the Company's **Whistleblower Policy** for further information regarding the investigation process for matters reported under that policy.

8. EMPLOYEE ASSISTANCE PROGRAM

- 8.1. Company Personnel are entitled to a certain amount of free, professional counselling from our employee assistance program. To access the employee assistance program, contact **Acacia Employee Assistance Program**.
- Phone: 1300 364 273
Text: 0401 33 77 11
Website/ Live Chat: www.acaciaconnection.com
- 8.2. Employee assistance program counselling is confidential, and nothing discussed with a counsellor will be communicated back to the Company.

9. TRAINING AND AWARENESS

- 9.1. Failure to adhere to this Code will be considered serious misconduct and may result in disciplinary action which could include termination of employment or contractual arrangements.
- 9.2. All Company Personnel will be provided a copy of this Code as part of the employee onboarding exercise and as and when there has been a change to this Code. All employees will need to acknowledge that they have read and understood the Code as required by the Company.
- 9.3. Any questions in the application or the interpretation of this Code, employees may contact a member of the Senior Management or the Company Secretary.

10. CODE REVIEW AND AMENDMENTS

- 10.1. This Code must be reviewed by the Board with the recommendation from the Audit and Risk Committee at least **once every 2 years** or as may be required to ensure it is operating effectively. Any recommended changes must be approved by the Board.

11. DOCUMENT INFORMATION

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Approval Body:	EQ Resources Board	
Maintained by:	Company Secretary	