

OUR COMMITMENTS AND PRINCIPLES

KINCROME conducts its business with integrity, honesty, respect and accountability and complies with all relevant laws, regulations, codes and standards. Our company values define the way in which we approach our work and are fundamental to the development of a positive organisational culture.

CODE OF CONDUCT

The KINCROME Code of Conduct (**KCOC**) (which can be found at www.kincrome.com.au) is a public declaration of the principles of good conduct and standards of behaviour that anyone who acts on behalf of KINCROME are expected to demonstrate in the performance of their roles and functions. The standards within the KCOC apply to all employees, partners, officers, and board of directors, as well as temporary workers, suppliers and independent contractors on KINCROME. We expect that third parties working on our behalf will follow similarly high ethical standards, which is why we have implemented this Supplier Code of Conduct.

By consistently applying these standards of behaviour across all facets of our business operations, we enhance public trust and confidence in each of us.

SUPPLIER CODE OF CONDUCT

This Supplier Code of Conduct (**Code of Conduct**) sets the minimum standards of behaviour required of our Suppliers carrying out their functions.

Where Australian, or other applicable laws, rules, regulations or other conditions impose conditions that are stricter than those in this Code of Conduct, Suppliers (and Supply Chain) must comply with those requirements. We are committed to implementing our Code of Conduct, not only to ensure that the environment and people impacted by our business operations are treated appropriately, but also to ensure that we are engaging with Suppliers that are aligned with our values.

DEFINITIONS

KINCROME means KINCROME Australia Pty Ltd, KINCROME Far East Pty Ltd, KINCROME NZ P/L, including all subsidiaries and related entities.

Second Tier Suppliers means all businesses and individuals engaged to supply goods or services to KINCROME's Suppliers.

Suppliers means all businesses and individuals involved in the supply of goods or services to KINCROME.

Supply Chain means all Suppliers and Second Tier Suppliers involved in the supply of goods or services to KINCROME.

Workers means all employees, whether permanent, part-time, contract, migrant, student, volunteer, temporary or any other type of worker engaged by KINCROME's Suppliers, sub-contractors and Supply Chain.

BUSINESS CONDUCT

Suppliers are expected to conduct business in compliance with local laws, regulations and industry standards in each jurisdiction in which they operate.

KINCROME respects human rights and requires all Workers to treat others with respect, dignity, trust, fairness and equality. KINCROME expects that Suppliers will show the same respect throughout the Supply Chain and implement and maintain compliance with the KCOC. Consistent and supplementary to the KCOC, KINCROME expects Suppliers to act in an ethical manner at all times by conducting themselves consistently with the following principles:

Ethical Behaviour

- > All Suppliers must conduct themselves in a way that is fair and honest and in the best interests of KINCROME.
- > Suppliers endeavour to ensure that their procurement and operation processes are transparent and in line with KINCROME's Ethical Sourcing Policy.
- > Suppliers are not to engage in conduct which may bring discredit upon KINCROME and must refrain from public criticism of KINCROME Workers, KINCROME business decisions or KINCROME policies and practices.
- > Suppliers must behave in an honest and non-fraudulent manner.

Diversity and Equal Opportunity

KINCROME expects Suppliers to:

- > Promote a diverse and inclusive workplace free of discrimination on the basis of: race, gender, age, religion, nationality or ethnic origin, disability, family responsibilities or parental status, marital status, medical record, irrelevant criminal record, political views, gender identity, pregnancy or potential pregnancy, religious beliefs or activity, trade union affiliation, physical appearance, social origin or carers' responsibilities.

Health & Safety

Suppliers must:

- > Comply with all relevant standards, laws and regulations related to workplace health and safety to ensure healthy conditions for their Workers.
- > Manage occupational health and safety hazards and provide their Workers with relevant job-related information and training.
- > Ensure work environments and where applicable, accommodation, are hygienic and safe.
- > Ensure that their Workers are appropriately protected from exposure to hazardous materials and unsafe working conditions.
- > Implement processes, policies and/or standards to prevent and minimise health and safety risks, and to identify and record work related injuries and illnesses.
- > Properly evaluate production and other machinery for safety hazards, and ensure that where applicable, guards and barriers are provided and properly maintained.
- > Inform KINCROME immediately of the death of any of their Workers due to a workplace incident, and provide details as requested by KINCROME.

Labour & Human Rights

Suppliers must:

- > Not engage in conduct or behaviour which is bullying, harassment or discrimination as these behaviours are a breach of legislation.
- > Examples of harassing behaviours include but are not limited to displaying offensive material (including non-electronic format); unwelcome physical contact; offensive or demeaning statements, jokes, comments or innuendo; unwelcome remarks or insinuations about a person's appearance, sexual

activities or private life.

- > Examples of bullying behaviours include but are not limited to abusive, insulting or offensive language, comments or gestures towards others; spreading misinformation or malicious rumours; behaviour that belittles and/or humiliates; unreasonable exclusion from workplace activities.
- > Unlawful discrimination is the less favourable treatment of a person or group of people based on particular attributes. Examples include but are not limited to gender, sexual orientation, marital status, pregnancy, ethnicity or religion, disability or age.
- > Ensure all Workers work freely without the use of modern slavery, including forced or compulsory labour, trafficking of persons, slavery, debt bondage, prison labour and child labour, both within the Supplier's operations and Second Tier Suppliers;
- > Follow all applicable laws, regulations and commonly accepted industry standards with respect to wages and working hours of their Workers.
- > Ensure that Workers receive their wages (including any additional payment required for overtime work), leave entitlements, benefits and superannuation in a timely manner.
- > Not use wage deductions as a disciplinary measure.

Environment & Sustainability

It is important to KINCROME that KINCROME, their Suppliers and the Supply Chain minimise their impact on the environment and humans. In this regard, it is of paramount importance that the Supply Chain commit to responsible sourcing of materials. The use of any conflict or illegal minerals or materials that can be associated with environmental destruction and human rights violation is unacceptable within the Supply Chain.

At a minimum, the Supplier:

- > Must comply with relevant laws, regulations and standards regarding environmental management, prohibition or control of particular chemicals and materials, reporting and required permits.
- > Should establish framework to seek to reduce the environmental impact of their operations.
- > Must exercise due diligence when sourcing minerals and materials and make their due diligence measures available to KINCROME upon KINCROME's request.
- > Should consider the sustainability and long-term impact on the environment in their design, development, manufacture, packaging and delivery of their goods.

APPLICATION AND COMPLIANCE

- > KINCROME expects Suppliers to respect and be accountable for compliance with this Code of Conduct, and to implement/develop the necessary procedures, tools, record-keeping and systems required to support compliance.
- > Suppliers endeavor to ensure that Second Tier Suppliers and Supply Chain engaged for the performance of Suppliers' duties towards KINCROME also comply with the KCOC and this Code of Conduct.
- > Suppliers must provide an avenue for Workers' grievances to be heard, fairly investigated and where required appropriate remedial action should be taken.
- > KINCROME may conduct assessments or require Suppliers to conduct self-assessments from time to time and KINCROME reserves the right to undertake due diligence and/or risk assessments and any other steps required to verify Supplier's

compliance with this Code of Conduct.

- > It is expected that Suppliers cooperate and provide required information and/or supporting evidence as KINCROME may reasonably require to monitor and review the Supplier's compliance.
- > KINCROME understands that it may take time for Suppliers to make necessary adjustments, and the introduction of this Code of Conduct provides an opportunity for KINCROME to strengthen its relationships with Suppliers. KINCROME welcomes Suppliers to contact KINCROME should they require any support or guidance in implementing this Code of Conduct, or generally, including to report actual or suspected violations of this Code. KINCROME will maintain confidentiality to the extent possible regarding any information received.

BREACHES OF THIS POLICY

- > Breaches or continued non-compliance with this Code of Conduct by a Supplier may result in KINCROME terminating its relationship or agreement with such Supplier.
- > Suspected breaches of the Code of Conduct may be investigated by KINCROME.

CODE OF CONDUCT ACKNOWLEDGEMENT

By certifying to the Code of Conduct, Suppliers acknowledge that:

- *They have read the entire KCOC and Code of Conduct and understand their responsibilities related to it.*
- *They have had the opportunity to ask questions to clarify any unclear aspects of the Code of Conduct.*
- *They agree to abide by the Code of Conduct.*
- *They agree to report to KINCROME any violations of the Code of Conduct.*
- *They agree to cooperate in any investigations of violations of the Code of Conduct.*

Signed for and on behalf of the Supplier by its duly authorised officer:

FULL NAME

SUPPLIER NAME

DATE