

CODE OF CONDUCT POLICY

De Grey Mining Limited (“De Grey”) is committed to operating with a high level of ethical business standards and integrity. We expect every employee and representative of De Grey to apply the principles of the Code to relationships with each other, with our employer, with the community we work and operate in and with all those with whom we deal in our work for the Company and how we operate.

These principles guide our expected standards of behaviour and empower our people to make honest and ethical decisions. It outlines the way in which we expect you to conduct business.

Application

The code of conduct applies to all employees, contractors, consultants, business partners and suppliers.

The code of conduct applies to the workplace, work or work-related functions or events, whilst travelling for work or to and from work, whilst representing the company, whilst in company logo uniform, and at company provided or work-related accommodation.

Our Commitment

When representing the Company, we will abide by the following minimum standards:

We are committed to providing a safe workplace

- We maintain a safe and fair work environment and work safely at everything we do.
- We work to achieve our goal of Zero harm.
- We look after the health and wellbeing of ourselves and our team-mates.
- We cooperate with others on Health and Safety directions and instructions.
- We do not perform duties which we are not qualified to do.
- We wear the correct PPE.
- We do not work under the influence of alcohol and / or drugs that could prevent us from performing our work safely.

We treat each other with respect and dignity

- We value our people and their personal commitment to delivering value to shareholders.
- We value a diverse and inclusive workforce free from bullying, harassment, sexual harassment and discrimination.
- We maintain a supportive and professional environment where everyone is encouraged to perform at their best.
- Everyone is entitled to be treated with respect as a person, regardless of their role or individual differences.
- We encourage co-operation, learning and growth in all who work with us.
- We strive to understand and respond to the needs of the Company’s stakeholders.
- We have zero tolerance for violent behaviour at the workplace home or community.

We respect the law and act accordingly:

- We respect the laws, customs and business practices of the communities in which we operate, but do not compromise the principles embodied in this code.
- We require all employees, contractors and visitors to comply with the law and act ethically in all dealings.
- We notify the Managing Director or another Board member immediately of any breach of the law.
- In interpreting the law, we adopt a course which preserves integrity.

We are fair and honest in our dealings:

- We are fair and honest in all our dealings with our employees, contractors, business partners, visitors and suppliers.
- Honesty, for us, means not using coercive or misleading practices or falsifying or wrongfully withholding information.
- We do not place ourselves in situations in which our private interests could conflict directly or indirectly with our obligations to the Company.

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- We prohibit any acts of corruption or bribery.
- We do not improperly influence internal and external decision makers.
- We do not accept benefits such as gifts or entertainment when the situation could be seen as creating an obligation or may appear to influence and outcome.
- We do not act in ways which may cause others to question our loyalty to the Company.
- We avoid any situation that creates a conflict of interest.
- We do not behave in a way that could damage the company reputation or our relationship with our communities.
- We observe applicable laws regarding political contributions, activities and lobbying.
- We compete fairly and ethically.
- We comply with the Company's security and trading obligations and do not use information not readily available in the public domain to our advantage

We use the Company's property responsibly and in the best interest of the Company and its reputation:

- We do not use Company funds to provide unreasonable benefits such as gifts or entertainment for ourselves or others.
- We use the Company's property for the Company's business purposes.
- We use the Company's information systems to complete our duties, with limited personal usage.
- We do not use the company's information systems for activities that are unlawful, illegal, offensive or discriminatory, that we are unauthorised to do or for personal profit.
- We have a zero-tolerance approach to Fraud or Theft.
- We are responsible for our actions and accountable for their consequence.
- We take personal responsibility for all matters over which we have control and the manner in which these are achieved.
- We are accountable for the results and consequences.

We are responsible to the community and to the individual:

- We recognise and respect our responsibilities to the communities in which we operate and foster a culture of positive engagement.
- We recognise the importance of creating a positive environment, social and economic impacts in all aspects of our business.
- We care and respect the diversity and traditions of the indigenous culture in which we operate.
- We are committed to safeguarding our environment and protecting biodiversity.

We understand our obligations in relation to confidentiality and privacy

- We understand and respect the sensitivity and confidentiality of information we are provided with in our roles and do not release this information without appropriate consent.
- We respect the privacy of personnel information for all workers.

We are responsible for upholding Human Rights

- We recognise the importance of Human Rights and assisting with protecting the rights of all people through our activities.

Compliance to the Code

It is an expected condition of working with De Grey that you comply with the Code of Conduct.

Breaches of the Code

If you are aware or experiencing behaviour which is in breach of the code, you should report this to your manager or the HR department. All complaints and disclosures will be treated confidentially. Any employee who makes a complaint or discloses an alleged breach of the Code of Conduct will not be disadvantaged or prejudiced for doing so.

For Employees, breaches of the code of conduct may result in disciplinary action up to and including termination of employment.

Signature:



Date: 01/04/2022