



Code of Conduct

Approved by the MLG Oz Limited Board on 14 May 2024



Contents

1. INTRODUCTION	3
2. WHO DOES THE CODE OF CONDUCT APPLY TO?	3
3. OUR OBJECTIVE	3
4. OUR VALUES	4
5. PROFESSIONAL BEHAVIOUR	4
6. COMPLIANCE WITH THE LAW	5
7. CONFLICTS OF INTEREST	5
8. CORPORATE OPPORTUNITIES	6
9. THE COMPANY'S RESOURCES AND ASSETS	6
10. USE OF ELECTRONIC RESOURCES	6
11. GIFTS, ENTERTAINMENT, SPONSORSHIPS AND DONATIONS	7
12. OUR RESPONSIBILITY.....	7



1. INTRODUCTION

MLG Oz Limited (the **Company**) is an organisation which strives to act with honesty and integrity in its business interactions and to be a respected in the industry and the communities in which it operates.

The Company places the utmost importance on maintaining our reputation as an organisation which operates legally and ethically.

The aim of this Code of Conduct is to:

- (a) provide guidance on the standard of behaviour expected of the Company employees;
- (b) ensure the highest ethical standards are maintained within the Company; and
- (c) ensure the reasonable expectations of the Company's stakeholders are met.

The Code of Conduct has been approved by the Board of the Company.

2. WHO DOES THE CODE OF CONDUCT APPLY TO?

The Company Code of Conduct applies to employees, Directors and other officers of the Company. The Company Code of Conduct also applies to all others who work for, act on behalf of, or represent the Company, including contractors and consultants. The term "employee" is used throughout the Code of Conduct to refer to all those who are expected to follow the Code of Conduct, irrespective of their employment status (that is, whether they are employed on a full time, part time, maximum term, casual or temporary basis).

3. OUR OBJECTIVE

The Company's aim is to deliver outstanding and sustained value to our shareholders, customers, employees and other key stakeholders by focusing on the following objectives:

- (a) act with honesty, integrity and fairness;
- (b) meet the needs of customers on a reliable, competitive and professional basis;
- (c) provide a safe and rewarding workplace for all employees where people make a real and worthwhile contribution to the achievement of our business objectives; and
- (d) reward good performance and provide opportunities for career advancement.



4. OUR VALUES

The Company's core values are:

Integrity

We inspire trust and confidence by being honest, transparent and committed to doing what is right.

Innovation

We encourage each other to challenge the status quo and turn ideas into reality.

Accountability

We hold ourselves accountable for our actions, the safety of each other, protecting the environment, and supporting the communities where we work.

Teamwork

We view ourselves as a community, where each member is valued, respected and supported to succeed.

Courage

We speak up to say what needs to be said, and we do what needs to be done.

5. PROFESSIONAL BEHAVIOUR

Directors, senior executives and employees are expected to maintain the highest level of professional conduct in their interactions with each other and in representing the Company.

Directors, senior executives and employees must ensure they:

- (a) act in accordance with the Company's stated values and in the best interests of the Company;
- (b) comply with all laws and regulations that apply to the Company and its operations;
- (c) act ethically and responsibly;
- (d) treat fellow staff members with respect and not engage in bullying, harassment or discrimination;
- (e) deal with customers and suppliers fairly;
- (f) disclose and deal appropriately with any conflicts between their personal interests and their duties as a director, senior executive or employee;
- (g) not take advantage of their position or the opportunities arising therefrom for personal gain;
- (h) report breaches of this code to the appropriate person or body within the organisation;
- (i) remain alert to hazards to themselves and others, and not accept or ignore an unsafe task or condition;



- (j) maintain confidentiality of sensitive information;
- (k) do not bring the Company into disrepute;
- (l) devote their whole time, attention and ability to the business of the Company while at work;
- (m) do not enter into any arrangement or participate in any activity that would conflict with the Company's best interests or that would be likely to negatively affect the Company's reputation;
- (n) do not take advantage of the property or information of the Company or its customers for personal gain or to cause detriment to the Company or its customers;
- (o) comply with all of the Company's policies, procedures and practices as varied from time to time;
- (p) act with honesty and integrity; and
- (q) treat everyone with respect and dignity.

6. COMPLIANCE WITH THE LAW

Employees of the Company must respect and attempt to observe all laws and regulations that apply to the Company and its operations. This requirement means employees should understand the laws and regulations relevant to them, as an ordinary person, in relation to their specific job and the country in which they are working.

Employees of the Company are expected to comply not only with their legal obligations but also to act ethically and responsibly in their interactions with each other and in representing the Company.

The Company reserves the right to inform the appropriate authorities where it is considered that there has been criminal activity or a breach of the law.

7. CONFLICTS OF INTEREST

The Company supports the involvement of its employees in community activities and professional organisations. However, outside employment or activity must not conflict with an employee's ability to properly perform their work for the Company, nor create a conflict (or the appearance of a conflict) of interest. A conflict of interest arises when there are competing interests which cannot be met at the same time.

Employees owe their first business loyalty to the Company. Any employee who wishes to take up any form of employment outside of their employment with the Company which relates to an organisation that has, or is seeking, a business relationship with the Company or competes with services provided by the Company must seek the approval of the Managing Director (**MD**).

Employees will not be permitted to take up any position as an employee, Director, partner, agent, contractor or consultant which compromises, or is in conflict with, the performance of, and responsibilities of, their employment with the Company.



Professional members should be careful to avoid acting in conflict with the Company when representing their profession.

8. CORPORATE OPPORTUNITIES

Employees must not take advantage of property, information, or other opportunities arising from their position with the Company.

9. THE COMPANY'S RESOURCES AND ASSETS

Employees must use the Company's resources (including computer facilities, information systems and electronic resources such as internet and email) and premises appropriately, responsibly and in the best interests of the Company.

Employees must take all necessary steps to ensure that:

- (a) the Company's resources and assets, including funds, equipment and information, are protected; and
- (b) the Company's resources and assets, including funds, equipment and information, are used only for the purpose for which they were intended to be used and are used in accordance the Company policies and procedures.

10. USE OF ELECTRONIC RESOURCES

All employees must use the Company's computer facilities, information systems and other electronic resources appropriately, responsibly and in the best interests of the Company.

Unauthorised access to confidential information is prohibited.

The Company will act with integrity by:

- (a) Never offering, paying, soliciting or accepting bribes in any form;
- (b) Never offering or accepting an item, money, travel, hospitality, entertainment or other token of appreciate that may be construed or used by others to allege favouritism, discrimination, collusion or similarly unacceptable practices;
- (c) never engaging in any form of corrupt business practice, whether for the benefit of the Company, its employees, or any other party.

A bribe may be monetary or non-monetary, tangible or intangible. It may take the form of, or be facilitated through:

- (a) Payments of money;
- (b) Gifts or entertainment;
- (c) Discounts, loans and/or financing given on non-commercial terms;
- (d) rebates of kickbacks in relation to services provide;
- (e) overpayments to business partners



- (f) use of assets at a discount or free or charge
- (g) sponsorships, charitable contribution and community investments;
- (h) political contributions;
- (i) employment or internships, or
- (j) information or assistance.

Corruption means the misuse of abuse of public or private office or power for personal gain.

11. GIFTS, ENTERTAINMENT, SPONSORSHIPS AND DONATIONS

The Company will provide and accept gifts and entertainment that are in good faith, occasional, reasonable and appropriate and seen as normal business courtesy. The Company will not give or accept gifts and entertainment or contribute to a sponsorship or donation with the intent of influencing decision-making or could be capable of being regarded in any way as a bribe.

The test to be applied is whether in all the circumstances the gift or hospitality is reasonable and justifiable. The intention behind the gift should always be considered.

To ensure proper implementation of this policy, any gift valued over \$500 given or received should be disclosed to the relative Executive (or his or her delegate).

12. OUR RESPONSIBILITY

All Company employees, vendors, contractors, consultants and other business partners are expected to read, understand and adhere to this to this policy.

The Company reserves the right to take disciplinary action, up to and including termination of employment or contracts, against any individual found to have violated this policy.