

Code of Conduct

Chrysos Corporation Limited
ACN 613 131 141
(Company)

“Speed of Light” Summary Guidance

This Code sets out the values, commitments, ethical standards and policies of the Company and outlines the standards of conduct expected of its business and people, taking into account the Company’s legal and other obligations to its stakeholders.

Who does this Code apply to?

This Code applies to everyone acting for or on behalf of the Company, including directors, officers, senior management, employees, contractors, consultants and other persons working in the business (collectively, **representatives**), wherever those people are located.

What are the guiding principles of the Code?

The guiding principles of the Code are the Company’s key values of: S.O.D.A.

- (a) **Safety is non-negotiable:** *We prioritise physical and psychological safety in every decision and action, and we speak up when something is unsafe.*
- (b) **One United Team:** *We work together with trust, respect and accountability to achieve shared success.*
- (c) **Delighted Customers:** *We take ownership of the experience we create and focus on delivering outcomes that build trust and loyalty.*
- (d) **Always Improving:** *We challenge the status quo, embrace feedback, and continuously learn to improve.*

How should this Code be used?

Parties covered under the Code should:

- seek to familiarise themselves with the Company’s standards outlined in the Code and related policies; and
- apply these standards to their day-to-day decisions, behaviours and interactions in their relevant roles and dealings with the Company.

This Code is intended to guide judgement, particularly in complex or pressured situations, and to support a safe, ethical, high-performance culture.

Breaches of the Code

If a breach of this Code is found to have occurred, depending on the nature of the breach, the party responsible may face legal or disciplinary action including termination of their employment or engagement.

Further information

Should you require further information regarding this Code, please contact the Company Secretary.

1 Purpose and application

1.1 Purpose of this Code

The Company is committed to conducting business in an ethical manner, with integrity, and in compliance with laws in all countries in which we operate.

The purpose of this Code is to:

- (a) set the minimum standards of behaviour expected of our people at work;
- (b) support a culture in which our people act lawfully, ethically, respectfully and responsibly;
- (c) support the Company's compliance with applicable workplace and work health and safety, and the standards and expectations of the communities in which we operate;
- (d) define clear pathways to allow our people to speak up and escalate concerns; and
- (e) facilitate Board oversight of the culture of the business and the conduct of our people.

The Board has endorsed this Code

1.2 Application of this Code

This Code sets out the minimum standards of behavior expected of everyone acting for or on behalf of the Company, including directors and, officers, senior management, employees, contractors, consultants and other persons that act on behalf of the Company (collectively, **representatives**), wherever those people are located.

The values, commitments, and standards of behavior set out in this Code are not exhaustive and are intended to guide decision-making and support a culture of integrity. Representatives are expected to exercise sound judgement and act consistently with the spirit and purpose of this Code.

The Company also expects its key customers, suppliers and other business partners to operate in a manner consistent with the standards set out in this Code, including compliance with applicable laws, labour standards and human rights obligations

As a global business, Chrysos has representatives that live and work in multiple jurisdictions across the world. In some of these places, this Code may impose more restrictive standards than those provided for in local law or custom. Even in those circumstances, the values, commitments, and standards of behavior set out in this Code must be observed.

All directors, officers, senior management, employees and key contractors will receive training on their obligations under this Code.

If a breach of this Code is found to have occurred, depending on the nature of the breach, the party responsible may face legal or disciplinary action including termination of their employment or engagement.

1.3 How this Code interacts with other Company policies

This Code should be read in conjunction with all relevant Company policies, which include (but are not limited to):

- Diversity, Equity & Inclusion Policy
- Anti-Bribery & Corruption Policy
- Securities & Trading Policy
- Whistleblower Policy

Copies of these policies are available on the Company's website.

1.4 ASX Corporate Governance Principles

Unless otherwise stated in the annual Corporate Governance Statement, the Company has adopted the recommendations provided in the ASX Corporate Governance Principles and, in particular, the recommendations regarding codes of conduct.

2 Our core values and expectations

2.1 Core values

The Company's core values and commitments are:

- (a) **Safety is non-negotiable:** *We prioritise physical and psychological safety in every decision and action, and we speak up when something is unsafe.*
- (b) **One United Team:** *We work together with trust, respect and accountability to achieve shared success.*
- (c) **Delighted Customers:** *We take ownership of the experience we create and focus on delivering outcomes that build trust and loyalty.*
- (d) **Always Improving:** *We challenge the status quo, embrace feedback, and continuously learn to improve.*

2.2 Expectations

Every representative of the Company must:

- (a) act at all times in accordance with the Company's core values, including by:
 - (i) acting lawfully, ethically and with integrity;
 - (ii) treating fellow Company representatives with empathy and respect and not engaging in any unacceptable behaviors (as defined below) at work; and
 - (iii) dealing with all customers, shareholders, service providers, suppliers and communities affected by our operations fairly and responsibly;
- (b) act at all times in the best interests of the Company and not:
 - (i) take advantage of the property or information of the Company or its customers for personal gain or to cause detriment to the entity or its customers; or
 - (ii) take advantage of their positions or the opportunities arising therefrom for personal gain; and
- (c) avoid or otherwise disclose and deal appropriately with any conflicts between personal interest and duties within the Company;
- (d) comply with their obligations related to confidentiality and privacy as provided for under their contract of employment or engagement;
- (e) not act in any way that could cause harm to the Company's reputation or market position;
- (a) report breaches of this Code or raise concerns regarding any conduct observed in the workplace that may be unlawful, unsafe, unethical or inconsistent with this Code through the appropriate channels, as defined in section 5 of this Code; and
- (b) periodically complete training and confirm their understanding of, and compliance with, this Code.

3 Your obligations

3.1 Acting lawfully, ethically and with integrity

All representatives of the Company must act lawfully, ethically and with integrity in the conduct of Company's business and must not engage in conduct that is misleading, deceptive, dishonest, fraudulent, corrupt or improper. In practical terms, this requires representatives of the Company to make themselves aware of, and comply with:

- (a) the laws and regulations that apply where they work and where the Company conducts business;
- (b) this Code and the values, commitments, and standards of behavior defined by it; and
- (c) each other Policy of the Company designed to ensure compliance with applicable laws including, without limitation, the Company's:
 - (i) Anti-Bribery and Corruption Policy (which prohibits representatives from offering, promising, authorising or providing, any bribe, facilitation payment or improper benefit to influence business decisions); and
 - (ii) Securities Trading Policy (which, among other things, prohibits insider trading and other unlawful dealings in securities).

Chrysos operates across multiple jurisdictions with different legal systems, regulatory frameworks, business practices and cultural norms. While standards of conduct and expectations may vary between countries or locations in which we operate, all representatives must comply with the standards set by this Code at a minimum.

Where local laws, customs or practices differ from the standards set by this Code, representatives must apply the **higher or more stringent standard**, unless doing so would breach local law.

Representatives are expected to interpret the law in a way which reinforces the Company's reputation for integrity. If you are uncertain about the interpretation of any applicable law or regulation or requirement, contact your manager or the Secretary.

3.2 Work Health and Safety

All representatives of the Company have a responsibility to ensure that their conduct does not place themselves or others at risk and that they comply with applicable work health and safety (WHS) laws, policies and procedures.

Respect@Work and Psychosocial Safety

The Company is committed to fostering a workplace that is free from discrimination, bullying, harassment, victimization, vilification, aggression, retaliation and/or other unacceptable or unlawful workplace behaviours (collectively, **unacceptable behaviour**).

The Company recognizes that psychological health and safety is part of work health and safety and that psychosocial hazards may include bullying, harassment and conflict with or by leaders, peers, customers or third parties, and other unacceptable behaviours.

The Company will:

- (a) take reasonable and proportionate measures to prevent unacceptable behaviour in the workplace; and
- (b) identify, assess and implement controls for reasonably foreseeable psychosocial hazards.

Every representative of the Company will work together to maintain a workplace that is respectful and safe by:

- (a) behaving respectfully at work, work-related events and in the context of travel, online interactions and work-related social settings (collectively, **at work**), and not engaging in any unacceptable behaviour at work;

- (b) not engaging in conduct at work that could create an intimidating, humiliating, hostile or offensive environment at work;
- (c) cooperating with Company investigations and interventions to minimize harm associated with unacceptable behaviour in the workplace; and
- (d) complete or participate in training required by the Company.

Use of alcohol and drugs

Representatives must be fit for work and must not be impaired by alcohol, illegal drugs, or the misuse of prescription or over-the-counter medication while performing work for the Company, travelling on behalf of the Company, attending work related functions or activities or conducting business on the Company's behalf. The possession, use, sale or offering or distribution of illegal drugs or other controlled substances on Company premises or while performing work for the Company, conducting Company business, travelling on behalf of the Company or at work related functions or activities is forbidden.

Alcohol may only be consumed in a responsible manner where it is permitted at approved work-related functions or events. Alcohol consumption must not impair a person's ability to perform their duties safely, comply with the law, or uphold the standards expected under this Code.

Representatives must also consider the health, safety and wellbeing of others, including the potential impacts of alcohol or drug use on workplace behaviour, decision-making, and the psychological safety of colleagues.

Representatives who are taking prescribed medication that may affect their ability to perform their duties safely should seek appropriate guidance from their manager or the relevant Company representative.

3.3 Fair dealing

Representatives of the Company must treat each other and all customers, shareholders, service providers, suppliers and communities affected by our operations fairly and responsibly.

Representatives must act honestly, professionally and with respect in all business dealings and must not take unfair advantage of any person through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair dealing practice.

Representatives should seek to build relationships based on trust, transparency and mutual respect, and must ensure that decisions and interactions are conducted in a manner consistent with the Company's values, applicable laws and this Code. Unlawful, unethical or misleading conduct in dealings with others is not permitted.

3.4 ESG and Modern Slavery

The Company is committed to responsible and sustainable business practices and expects its representatives to consider environmental and social impacts in decision-making.

The Company is committed to respecting internationally recognised human rights and expects its representatives, key customers, suppliers and other business partners to act consistently with these principles.

3.5 Company reputation

Representatives of the Company must not act in any way that could cause harm to the Company's reputation or market position during or after their employment or engagement ends.

Every representative of the Company has a duty to act in a manner that merits the continued trust and confidence of the public.

Public statements

Only authorised persons may make official media statements or announcements on behalf of the Company. If you are contacted by the media regarding Company matters and media engagement is not part of your role, you should refer the enquiry to your manager or the CEO via the Secretary.

The Company has adopted a Disclosure and Communication Policy as a means of ensuring compliance with its disclosure and communication obligations under the Corporations Act and the ASX Listing Rules. The aim of the Disclosure and Communication Policy is to keep the market fully informed of information that may have a material effect on the price or value of the Company's securities, and to correct any material mistake or misinformation in the market. Only the Board or authorised executives may approve information for release to the market under the ASX Listing Rules.

Please ensure that you are aware of the requirements of the Disclosure and Communication Policy and, if it applies to you, act in accordance with that policy.

Social Media

The Company encourages responsible use of social media such as blogs, discussion forums, video or photo sharing sites, social networking platforms, messaging services and similar digital channels. Examples include platforms such as X (Twitter), Facebook, Instagram, LinkedIn, TikTok, YouTube, WhatsApp, Wikipedia and similar services (**Social Media**).

Company accounts

Management may authorise certain representatives to communicate on behalf of the Company through Social Media. Where you are authorised to do so, you must:

- (a) clearly identify your name and position when acting in your authorised role;
- (b) ensure that any content published is accurate, professional and consistent with Company policies;
- (c) not disclose confidential or sensitive Company information that is not already in the public domain unless authorised in writing; and
- (d) communicate respectfully with all individuals and communities.

Personal accounts

If you refer to the Company, its people, products, services, competitors or other business-related matters when using Social Media in a personal capacity, you must:

- (a) ensure your comments cannot reasonably be interpreted as representing the Company's official position;
- (b) not state or imply that you are authorised to speak on behalf of the Company;
- (c) consider using a disclaimer that your views are your own; and
- (d) avoid using the identity of another Company representative or a representative of a business partner or competitor.

Representatives should also be mindful that privacy settings on social media platforms may still allow the disclosure of information about themselves or others.

When interacting online, representatives should exercise sound judgement in engaging with customers, suppliers, competitors or other stakeholders. If uncertain about appropriate conduct, guidance should be sought from a manager.

4 Board and management accountabilities

The Board is responsible for overseeing the Company's culture, values framework, conduct risk settings and the effectiveness of this Code.

Without limiting that oversight role, the Board will receive appropriate reporting on:

- (a) material breaches of this Code;
- (b) themes, trends and root causes from speak-up, complaints, WHS and people-risk data;

- (c) sexual harassment, bullying and psychosocial risk indicators;
- (d) disciplinary outcomes and consequence management;
- (e) customer, conduct, regulatory and reputational incidents;
- (f) modern slavery and salient human rights risks; and
- (g) effectiveness of remediation and control uplift actions.

Officers and senior executives are responsible for implementing this Code, setting the tone from the top, ensuring consequences for misconduct, and escalating material issues promptly.

Managers are accountable for local culture, safety, respectful conduct, early intervention and fair decision-making.

5 Speaking up and non-retaliation

Representatives must promptly report instances of suspected or alleged breaches of this Code to:

- (a) their manager; or
- (b) the Chief People Officer or Secretary.

Reporting of violations may also be done anonymously through the Company's confidential third party hotline provider at <https://www.yourcall.com.au/report> or 1300 790 228.

For further details on making a report, please refer to section 9 of the Company's Whistleblower Policy.

The Company expressly disallows retaliation against any person who has reported or escalated a good faith belief or concern that a Company policy or applicable law or regulation has been violated (known as a **Whistleblower**). This Policy strictly prohibits any form of retaliation against any Whistleblower in connection with raising a concern, reported in good faith, or for participating in any investigation of suspected or alleged misconduct.

Protections for Whistleblowers are also set out in section 10 of the Company's Whistleblower Policy.

6 Investigations and consequences of breach

Compliance with this Code will be monitored. Any known or suspected breaches of this Code will be assessed and, where appropriate, investigated promptly, fairly and confidentially to the extent practicable.

If a breach of this Code is determined to have occurred, the Company may take appropriate disciplinary or other action depending on the nature and seriousness of the breach. Such action may include legal or disciplinary measures, up to and including termination of employment or engagement. A breach may also be taken into account in decisions relating to discretionary remuneration. The Company will take any such action in accordance with applicable contractual terms and relevant policies.

Serious breaches of this Code will be notified to the Board.

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

7 Review and publication of this Code

The Board will review this Code annually in accordance with Company consultation and communication processes to check that it is operating effectively and whether any changes are required to this Code. This Code may be amended by resolution of the Board.

If the Board identifies any emerging conduct issues or is of the view that employees of the Company are unwilling or unable to report breaches of this Code, the Board may initiate actions as it considers necessary, including providing training sessions in relation to this Code.

This Code is available on the Company's website. Key features are published in:

- (a) either the annual report or on the Company's website; and
- (b) in the Appendix 4G to be lodged with the ASX at the same time as lodgment of the annual report.

**Adopted by resolution of the Board
On 30 April 2026**