



Code of Conduct

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Purpose

- (a) The purpose of this Code of Conduct (**the Code**) is to set out the standards of behaviour expected of those employed by or working in or for Peak Iron Mines Pty Ltd or its subsidiaries (**Peak Iron**).
- (b) The Code affirms Peak Iron's expectation of social and ethical behaviour from all of its employees and External Personnel.

Scope

- (a) This Code applies to all employees of Peak Iron.
- (b) Peak Iron employees have agreed in their respective employment agreements to comply with all Peak Iron policies, which Peak Iron may change, in its absolute discretion, from time to time.
- (c) Officers, contractors, consultants, agents, vendors, service providers, visitors, guests, clients and other intermediaries (**External Personnel**) are also expected to know and observe Peak Iron's standards and should be made aware of the Code when they are engaged to work with Peak Iron.
- (d) The Code applies whenever you are at work or identified as a representative of Peak Iron. In some circumstances, this will include times when you are outside of your workplace or working hours such as work functions, meetings, conferences or forums.
- (e) Peak Iron will review the Code from time to time, at its discretion.

Responsibilities

- (a) All employees are expected to read, understand and comply with the Code at all times when carrying out their work and should understand that any behaviour that is contrary to the Code may result in disciplinary action up to and including termination of employment.
- (b) Managers and supervisors are to monitor employees compliance with the Code.
- (c) External Personnel are expected to know and observe Peak Iron standards and should be aware of the Code and any of the policies mentioned in the Code.
- (d) If anyone is in doubt about the Code or its application, they should immediately seek advice from their manager.

Principles

- (a) Peak Iron is committed to providing a safe, positive and productive workplace, while complying with all applicable laws and regulations and acting in a manner that is consistent with the Core Organisational Values of Peak Iron.
- (b) Peak Iron can only achieve these objectives by setting clear standards which guide decision making and hold all employees and External Personnel accountable.
- (c) Peak Iron has adopted this Code to provide a set of guiding principles which are to be observed by all employees and External Personnel.



Core Organisational Values

- (a) All employees are expected, at all times, to act consistently with the principles set out in the Code and Peak Iron's Core Organisational Values which are:

Responsibility, Respect and Honesty, Trust, and Innovation and Growth

Responsibility

- (a) Maintain a safe and fair work environment and approach work in a way that maximises safety.
- (b) Act with due care and diligence in fulfilling the functions of their position and exercising the powers attached to that position.
- (c) Protect the environment in the conduct of all activities and in accordance with Peak Iron's Environmental Policy.
- (d) Comply with all applicable local, national and international laws in all jurisdictions in which Peak Iron operates.
- (e) Comply with all applicable policies, procedures and lawful directions of Peak Iron.

Respect and Honesty

- (a) Act honestly, in good faith and in the best interests of Peak Iron at all times.
- (b) Treat others with respect and dignity at all times.
- (c) Show fairness, courtesy, respect, consideration and sensitivity in all dealings within the workplace and with External Personnel and the public.
- (d) Avoid any form of discrimination, bullying, harassment, sexual harassment or other inappropriate workplace behaviour in accordance with Peak Iron's Workplace Harassment, Bullying and Discrimination Policy.
- (e) Take action to prevent or stop inappropriate or unlawful behaviours, if demonstrated by others and report such behaviours in accordance with Peak Iron's Workplace Harassment, Bullying and Discrimination Policy and Grievance and Complaints Resolution Procedure.
- (f) Participate in Peak Iron's complaints procedure, where appropriate.

Trust

- (a) Value, promote and maintain a high level of integrity and ethical conduct.
- (b) Do not commit or be a party to or involved in any bribery or corruption.
- (c) Do not use misleading, fraudulent or coercive practices or conduct.
- (d) Do not falsify or wrongly withhold information from Peak Iron.
- (e) Do not offer or accept cash, gifts or other gratuities for any reason, that could in any way create an obligation or a conflict of interest.



- (f) Do not deliberately or recklessly misuse or damage Peak Iron's property in your possession, care or custody.
- (g) Maintain Peak Iron's confidentiality at all times.
- (h) Do not use or take advantage of Peak Iron's assets, property, intellectual property, or confidential information for personal use or gain, or for the gain of your associates.
- (i) Not taking advantage of your position with Peak Iron for personal gain or for the gain of your associates.
- (j) Refrain from misusing any information, equipment, assets, systems or facilities of Peak Iron, including email and internet facilities, and ensure that these facilities are not used to access or distribute illegal, offensive or otherwise inappropriate material, or for any other purpose which may damage the reputation of Peak Iron.
- (k) Avoid conflicts of interest with Peak Iron, and promptly advise Peak Iron of any conflict or potential conflict of interest.

Innovation and Growth

- (a) Act fairly and professionally at all times.
- (b) Perform duties to the best of your ability and delivering work in a timely manner that meets or exceeds Peak Iron's expectations.
- (c) Clearly communicate expectations and recognise exceptional work.
- (d) Support and encourage training and education opportunities for employees and External Personnel.
- (e) Promote and protect the business, reputation, and interests of Peak Iron.
- (f) Avoid any conduct which may damage the reputation of Peak Iron.

Conflicts of Interest

- (a) All employees are expected to use their judgment to act, at all times and in all ways, in the best interests of Peak Iron while performing their employment duties. As such, employees should attempt to avoid actual or apparent conflicts of interest. A conflict of interest exists when your personal interests interfere with the best interests of Peak Iron.
- (b) For example, a conflict of interest may occur when you or a family member receive a personal benefit as a result of your position with Peak Iron.
- (c) Similarly, you may not use your position at Peak Iron to request personal benefits for yourself or your family members.
- (d) A conflict of interest may also arise from your personal relationship with a customer, supplier, vendor, competitor, business partner, or other Peak Iron employee or External Personnel, if that relationship impairs or may be perceived to impair your objective business judgment.
- (e) The best rule for any situation that appears to present a conflict of interest is to "abstain and disclose". If it is not possible to avoid participating in the event or activity creating the conflict:



- i. promptly disclose the potential conflict to your supervisor; and
- ii. avoid participating in decisions that might raise the appearance of a conflict until you receive appropriate guidance from Peak Iron.

Communications

- (a) You should take care to ensure that all business records and communications, including electronic communications, are clear and accurate. Electronic communications include, but are not limited to email, messaging, social media, online postings and publications, review websites, blogs, articles, including but not limited to any media outlet or journalist or as part of any media release.
- (b) No Peak Iron employee is permitted to comment to the media, or in any social media forum (including but not limited to networking sites, wikis, blogs or microblogs or discussion boards) other than the Managing Director of Peak Iron, about matters pertaining to or on behalf of Peak Iron or its businesses, unless expressly authorised to do so in writing.

Drugs and Alcohol

- (a) This section of the Code should be read in conjunction with the current Peak Iron Fitness for Work Policy.
- (b) On industrial work sites there may be stringent rules and policies. You are expected to familiarise yourself with and follow any specific site policies applicable to you.
- (c) Applicable site rules in relation to drugs and alcohol will take priority over the those set out in paragraphs (d) to (f) below to the extent of any inconsistency.
- (d) Peak Iron employees and other workers must not report to work, or perform work:
 - i. while under the influence of any illegal drug or substance; and/or
 - ii. if judgment, coordination, or performance could reasonably become impaired during work due to the use of any drug or substance.
- (e) Any employee or other Peak Iron worker who consumes or uses drugs or alcohol in breach of this Code may be subject to disciplinary action, up to and including the termination of employment or engagement.
- (f) Where Peak Iron, Peak Iron directors or senior management, or any other person authorised by Peak Iron, has significant doubts about an employee's or other Peak Iron worker's capacity to perform their duties or Peak Iron considers it necessary to ensure compliance with workplace health and safety obligations, Peak Iron reserves the right to:
 - i. direct an employee or other Peak Iron worker to participate in drug and alcohol testing by Peak Iron or a medical practitioner nominated by Peak Iron; and
 - ii. obtain and use the results of the drug and alcohol testing for purposes of the employee's or other worker's employment or engagement.



Confidential Information

- (a) Employees and External Personnel of Peak Iron that are privy to, party to or have knowledge of confidential information concerning Peak Iron, which may include but is not limited to technical, strategic or financial information, commercial arrangements or intellectual property, must not disclose such information or misuse such information to obtain a personal benefit or a benefit for another person. Peak Iron employees and External Personnel must:
 - i. use confidential information solely for purposes of their duties as employees and External Personnel of Peak Iron;
 - ii. preserve the confidentiality of confidential information, and ensure that it is not disclosed, except on a need-to-know and confidential basis, to other employees of Peak Iron or other authorised recipients on a confidential basis; and
 - iii. not use or modify any confidential information for their own or a third party's interest or benefit.
- (b) Confidential Information does not include any information which would be covered by section 333B of the *Fair Work Act 2009* (Cth).
- (c) Compliance with these obligations with respect to confidentiality and privacy, whether it be with respect to personal information, information about clients or confidential information concerning Peak Iron, is required to be maintained by all Peak Iron employees and External Personnel after they have left the employ of Peak Iron.
- (d) Peak Iron is committed to maintaining the confidentiality and security of information our employees and External Personnel become aware of in our dealings with customers, suppliers and other third parties.
- (e) All Peak Iron employees and External Personnel must ensure that information received in the course of their work remains secure. This includes not sharing private or confidential information with other employees, unless they need it to perform their work at Peak Iron. Confidential information should not be shared with those outside Peak Iron, unless authorised or required by law.

Protection and Use of Resources

- (a) Peak Iron provides its employees with a wide range of valuable resources to help you perform your work on behalf of Peak Iron at the highest level.
- (b) Employees are expected to treat Peak Iron's property with care and use them with the interests of the business in mind and in accordance with applicable Peak Iron policies and procedures. Property should be well maintained and not subject to unreasonable use. Peak Iron regards the unauthorised removal of equipment, supplies and other resources belonging to Peak Iron as theft.
- (c) Unless otherwise agreed in writing by Peak Iron, any intellectual property developed by an employee during, or as a result of, employment by Peak Iron is the sole property of Peak Iron. Employees must provide to Peak Iron, and on request assign to Peak Iron any rights in, all work, ideas, concepts, designs, inventions, models, developments and improvements made or developed during the course of their employment or through use of Peak Iron's time, materials, facilities or other resources.



Consequences of Breaching the Code

- (a) If any employee breaches the Code, that employee may face disciplinary action, up to and including termination of employment, depending on the severity or repeated nature of the breach. If the situation involves a breach of law or other regulation, the matter may also be referred to an appropriate law enforcement authority.
- (b) All employees and External Personnel have a responsibility to report any material breaches of the Code promptly and should also report conduct where they are unsure whether a breach of the Code has occurred.

Reporting of Breaches

- (a) In cases in which an individual reports a suspected violation of the Code, Peak Iron will attempt to keep its discussions and actions confidential to the greatest extent possible and in compliance with applicable laws and regulations governing privacy.
- (b) Peak Iron will investigate any report of a violation, if Peak Iron considers the matter warrants an investigation.
- (c) The *Corporations Act 2001* (Cth) also gives special protection to disclosure about Corporations Act breaches, as long as certain conditions are met.

Related Documents

Peak Iron's other policies should be read in conjunction with this Code.

These include:

- (a) Peak Iron Workplace Harassment, Bullying and Discrimination Policy;
- (b) Peak Iron Grievances and Complaint Resolution Procedure;
- (c) Peak Iron Disciplinary Policy;
- (d) Peak Iron Environmental Policy;
- (e) Peak Iron Health and Safety Policy;
- (f) Peak Iron Fitness For Work Policy; and
- (g) Peak Iron Privacy Policy.