JERVOIS COPPER PROJECT



WORKERS CODE OF CONDUCT

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Our **Values** are at the core of everything we do



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1 INTRODUCTION

Welcome to KGL Resources Limited's Jervois Project (the Project). We hope that your time on the Project will be safe, enjoyable and productive.

The contents of this Code of Conduct and of the Project policies, plans and procedures are intended to help all members of the Project Team to create a working environment free from harm.

Understanding of, and adherence to, the Code of Conduct, is an obligation shared by everyone on the Project.

This document provides an overview of the Project requirements that apply to all while engaged on the Project. The Code of Conduct forms part of Site access agreement while engaged on the Project. The 'Project' includes the Project construction site, construction car park and any Project associated transportation, accommodation and behaviour on site and in the local community.

You are also required to note the Jervois village rules.

The Project Code of Conduct requires that all workers treat others with courtesy, dignity and respect both at work, and travelling to and from the Project.

An expectation of behaviours while travelling for work, on site or in other accommodating communities as well as respect for local values is explicit. Workers demonstrating anti-social or behaviours that do not comply with Project's requirements may face disciplinary action. This may result in the withdrawal of access permission to the Project site.

To ensure a common understanding of the Code of Conduct, you are required to carefully read and thoroughly understand this document. If there are any parts of the Code of Conduct that you feel you do not fully understand, please ask your respective employer and/or Supervisor.

The Project Code of Conduct may be amended when and if required by the Project Team and forms part of your on-boarding obligations.

2 RESPONSIBILITIES AND EXPECTATIONS

2.1 ACCOUNTABILITY

Each employee is accountable for compliance with:

- Health and Safety Plans and procedures.
- Travel and Site Access Plans.
- Taking responsibility for their own personal safety and not negatively impacting the safety of other personnel working on the Project.
- Expectations that Project staff, contractors and their employees will engage in respectful and safe interactions with the community.
- Personal fitness for work regulations and policies.
- Environmental compliance.
- ILUA & AAPA Obligation Summary for Contractors.

2.2 INSTRUCTIONS

It is important that each employee follows reasonable instructions given by their supervisors. If an employee is concerned that they cannot perform any task, for any reason, they must inform their supervisor immediately.

Refusal to comply with any lawful instruction may result in disciplinary action, that may include withdrawal of access permission to Site.

2.3 FITNESS FOR WORK

All project personnel are required to always maintain a Blood Alcohol Content (BAC) of Zero (0.00%) during paid working hours (including travel to and from the site) and while at the Project site.

All project personnel are required to undertake a BAC test prior to the commencement of each work shift, prior to entering work areas.

A procedure for '*Fitness for Work*' applies on the Site, this procedure includes both 'random' and 'for cause' personnel testing for alcohol and drugs. Compliance with this procedure is mandatory.

A confirmed positive result to either drugs or alcohol is most likely to result in disciplinary action, including withdrawal of access permission to Site.

It is your responsibility to ensure that you are not impaired by drugs or alcohol whilst at work. Self-testing units are available at the site entrance.

You are required to notify your supervisor if you are taking any prescription medications and provide evidence where requested, of that prescription.

2.4 INDIGENOUS SITES AND HERITAGE:

Please respect Indigenous and Heritage sites.

Under the Aboriginal Sacred Sites and Heritage Conservation Act, it is an offence to wilfully disturb an Aboriginal site. Never touch, damage or remove anything from a suspected site.

2.5 SMOKING

The Project site is designated as a controlled non-smoking environment.

Smoking and vaping are not permitted across the Site generally, except where expressly authorised in designated smoking areas approved by Site Management.

Smoking is permitted only:

- Within clearly signposted designated smoking areas;
- During approved break times; and
- In accordance with site safety, fire prevention and environmental requirements.

The possession and use of smoking materials, including cigarettes, vapes and cigarette lighters, is restricted to designated smoking areas and approved break periods. Smoking materials must not be carried or used outside these areas.

Designated smoking areas will be:

- Located away from hazardous areas, flammable materials, plant and equipment;
- Equipped with appropriate fire controls and disposal facilities; and
- Subject to periodic review and withdrawal if safety or operational risks are identified.

Failure to comply with these requirements may result in disciplinary action and/or removal from site.

2.6 PERSONAL PROTECTIVE EQUIPMENT (PPE)

For personal safety, all project personnel shall be provided with appropriate protective work clothing and footwear by their employer.

Personal protective equipment (PPE) must meet Site requirements and be worn where required, as indicated by site signage and task-specific risk controls.

The basic PPE required to be worn and used is:

- Safety helmet.
- Safety glasses.
- Gloves – To be always carried and worn for all manual tasks.
- Lace up safety boots to be always worn whilst on the construction site.
- High visibility clothing.

It is a Project requirement that PPE must be worn and used at all times in the manner in that the manufacturer intended it to be worn or used.

PPE is not required to be worn when inside crib huts, camp and offices (e.g. safety helmets and glasses may be removed) unless you are performing construction or similar work in those areas.

Hand protection (gloves) must be worn for all manual tasks.

Additional PPE may be required depending on the work task being undertaken.

For safety communication reasons, all PPE (including Hard Hats/ Safety helmet) may only have approved stickers or labels affixed (e.g. first aid, employee name, induction label, company logo).

2.7 PRIVATE VEHICLES ON SITE

The Project has an overriding commitment to minimise the number of vehicles on roads.

Your employer is responsible for your transport between your point of hire and the Project Site.

No private vehicles are allowed within the Project Site unless expressly authorised by the KGL Resources Limited's Project Manager or their authorised representative. Approved vehicles must display a valid site access permit at all times.

It is a condition of your engagement at the Project that you will utilise transport supplied by your employer.

Any person found not to have meet this condition may result in disciplinary action and/or removal from site.

3 EMPLOYEE RELATIONS

3.1 EMPLOYEE AND HEALTH RECORDS

To comply with applicable laws, regulatory obligations and Project requirements, the Project team may require access to certain employee, fitness-for-work and health-related information, subject to applicable privacy and workplace laws.

Such information will be requested only to the extent reasonably necessary for safety, operational, emergency response, security, and compliance purposes, and will be managed in accordance with applicable privacy legislation and Project confidentiality requirements.

Where requested, employers and contractors are responsible for ensuring that information provided is accurate, complete, current and lawfully disclosed, including obtaining any necessary employee consents.

KGL Resources Limited will take reasonable care in handling, storing and using information provided; however, KGL Resources Limited relies on the accuracy and completeness of information supplied and does not accept liability for consequences arising from information that is incomplete, inaccurate, outdated, or not disclosed in full.

Failure to provide required information, or the provision of misleading or incomplete information, may result in restricted site access, removal from site, or other actions necessary to manage safety and compliance risks.

3.2 PROJECT BEHAVIOUR

All Project entities are committed to providing a workplace that is safe, conducive to providing a harmonious and productive work environment, that is free of hazards, unmitigated risk and ill treatment.

Outlined below are the Project definitions of Misconduct and Serious Misconduct.

3.2.1 Expected Standards of Behaviour

All personnel are expected to conduct themselves in a manner that supports the Project's safety, operational and cultural objectives, and contributes to a respectful, secure and productive workplace.

Compliance with Project procedures, Site rules and lawful and reasonable instructions is a condition of site access. Where behaviour does not meet these standards, it may be managed through the Project's fair treatment and disciplinary processes. Repeated or serious breaches may result in restricted or withdrawn site access.

Behaviour that does not meet Project standards includes, but is not limited to:

- Failure to comply with Project safety procedures or regulations that places, or has the potential to place, any person at risk of injury.
- Unauthorised absences.
- Failure to wear required personal protective equipment (PPE).

- Non-compliance with Site security and access control requirements.
- Failure to report injuries, incidents or hazards.
- Engaging in practical jokes, horseplay or other unsafe conduct.
- Gambling or the use of gambling devices on Site.
- Selling goods or services on the Site without authorisation.
- Failure to comply with lawful and reasonable work instructions, including assigned, higher or alternative duties.
- Unauthorised use of company communication systems or personal mobile devices during working hours in field or operational areas.
- Taking photographs or video recordings without approval.

3.2.2 Serious Misconduct

All personnel are expected to uphold the highest standards of safety, conduct and compliance while on the Project site and when representing the Project in the broader community.

Serious misconduct is behaviour that fundamentally undermines safety, security, lawful operations, cultural responsibilities or the reputation of the Project. Any substantiated instance of serious misconduct will be managed in accordance with the applicable fair treatment and disciplinary framework and may result, following investigation, in restricted or withdrawn site access.

Behaviour that does not meet Project standards and may constitute serious misconduct includes, but is not limited to, the following:

- Failure to comply with Project safety procedures or regulations where such failure results in, or has the potential to result in, serious or life-threatening injury.
- Improper, irresponsible or unauthorised use of fire protection or safety equipment.
- Possession or use of weapons, firearms or ammunition, including fixed-blade knives and non-lockable pocket or carton knives, unless expressly authorised.
- Smoking or vaping outside designated smoking areas.
- Possessing, using, or presenting for work while under the influence of alcohol or drugs.
- Unauthorised sale, supply or distribution of alcohol or drugs.
- Inappropriate sanitation practices, including urinating or defecating outside designated facilities.
- Offensive, intimidating, anti-social, threatening or violent behaviour of any kind.
- Vandalism, wilful damage to, or interference with company or personal property.
- Theft of, or unauthorised removal of, company or another person’s property from the Site.
- Unauthorised possession of company or another person’s property.
- Discrimination, bullying or harassment of any form, including conduct related to race, colour, religion, sex, age, national origin, ancestry or disability.
- Accessing restricted or controlled areas without authorisation or permit.

- Failure to comply with cultural heritage, native title or environmental protection requirements.
- Behaviour in the community that adversely affects the reputation of KGL Resources Limited, the Project or its contractors.
- Falsification of company or Project records, including time sheets, wage records, permits or production reports, regardless of when discovered.
- Bringing prohibited items onto the Site.
- Bringing unauthorised persons onto the Site.

4 SITE RULES

4.1 SITE ACCESS

All personnel are required to comply with all aspects of the Site access control program.

Access to the Site for all personnel will only be via the Project designated access gates in approved modes of transportation.

All vehicles and bags hand carried onto site may be subject to security search. Any person not complying with this condition of Site access (refusing to permit their bag or vehicle to be examined) may face disciplinary action, that may include restricted or withdrawn site access.

Under no circumstances will tools or equipment be loaned from site.

Information relevant to Site access and directions to each employee's work area on the Project will be identified at the Project Induction.

Personnel are prohibited from visiting other work areas on the Site unless:

- Instructed to do so by the employee's immediate supervisor and
- They have undertaken the appropriate inductions.

Visitors will only be authorised to access the Project Site when they are approved through the relevant Project procedures, accompanied by a person with appropriate inductions completed, and have attended the Project visitor safety induction.

Visitors must be escorted at all times by a person authorised to do so and who has been Project inducted.

The Project may not be accessed for any purpose other than authorised Project business.

4.2 SITE ROAD RULES

Company/Project vehicles anywhere on the Project site, its roads and parking areas, shall be operated in a safe and careful manner, and drivers shall comply with all traffic regulations and controls established for the Project.

The Site speed limit is 45KPH unless sign posted at a lower speed. Other requirements include:

- Drivers must be authorised to drive on Site by the Project.
- Seat belts will be always worn by all occupants when in an operating vehicle.

- Passing vehicles is prohibited.
- Vehicles must be stationary and parked safely, when the driver uses a mobile phone.
- Vehicles must reverse park in designated parking areas.
- Private vehicles are not permitted on the Project site.
- All vehicles must always comply with all Site regulations.
- Road rules apply on all Site roads unless overridden by specific rules such as speed limits defined on posted signs.

Failure to comply with Site Road rules, signage on the Site and on roads adjacent to the Site may result in revocation of driving privileges, or an offending vehicle removed at the driver's expense.

4.3 CAMERAS, PHOTOGRAPHY AND PERSONAL MOBILE DEVICES

To protect safety, privacy, security and commercial confidentiality, the use of cameras, video recording devices and the taking of photographs or video on the Project site is controlled.

Photography, video recording and audio recording (including via personal mobile phones and smart devices) are not permitted unless authorised by KGL Resources Limited or Site Management and undertaken in approved locations and for approved purposes.

Personal mobile phones are to be used in a manner that does not create safety risks or operational distraction. Unless expressly authorised, personal mobile phone use for non-work-related purposes is restricted during working hours, particularly in operational and fieldwork areas.

The following expectations apply to personal mobile phones:

- Personal mobile phones must be stored in designated areas such as crib rooms, lockers or other approved locations while personnel are performing work.
- Personal mobile phones may be used during authorised break periods and in designated break areas only.
- Personal mobile phones must not be used, carried or operated in active work areas, field locations, mobile equipment or vehicles, unless approved for work-related purposes.
- Personal mobile phones must not be used while operating plant, equipment or vehicles.

With prior approval from Site Management, reasonable use of personal mobile phones may be permitted in designated areas to address family, medical or emergency matters.

Failure to comply with these requirements may be managed in accordance with the Project's Code of Conduct and fair treatment processes and may result in disciplinary action or withdrawal of site access.

4.4 GAMBLING / RAFFLES

To maintain a safe, respectful and professional work environment, gambling is not permitted on the Project site at any time.

Lotteries, raffles, tipping competitions or similar activities are only permitted with prior written approval from KGL Resources Limited. Any approved activity must:

- Comply with applicable laws and regulations;

- Not interfere with work, safety, productivity or wellbeing;
- Not involve coercion or undue pressure on any individual; and
- Be conducted in approved locations and during non-working periods only.

Unauthorised gambling or raffles may be managed in accordance with the Project's Code of Conduct and disciplinary processes.

4.5 SELLING / BILL POSTING

To avoid disruption, conflicts of interest and safety risks, the selling or solicitation of merchandise or services on the Project site is not permitted unless expressly approved by KGL Resources Limited.

The unauthorised distribution, display or posting of notices, advertisements, pamphlets, flyers, posters or similar materials is not permitted on the Site, including in accommodation, crib rooms, workshops or operational areas.

Any approved selling, fundraising or information distribution activities must receive prior written approval from KGL Resources Limited and comply with Site rules regarding timing, location and conduct.

4.6 PROHIBITED ITEMS

To protect safety, security, wellbeing and compliance, certain items are not permitted on the Project site, unless expressly authorised by KGL Resources Limited for legitimate work-related purposes.

Prohibited items include, but are not limited to:

- Explosives, blasting agents or detonators, except where specifically approved and controlled in accordance with Project procedures and statutory requirements.
- Weapons, including fixed-blade knives, non-lockable pocket or carton knives, firearms, ammunition, or any item reasonably considered to be a weapon, unless expressly authorised for work purposes.
- Alcohol, illegal drugs and unauthorised controlled substances, including being in possession of, or under the influence of, such substances while on Site.
- Pornographic, sexually explicit or offensive material in any form, including printed, digital or electronic media.
- Animals, except accredited assistance dogs required for persons with a disability, subject to prior notification and approval.

KGL Resources Limited reserves the right to conduct inspections and take appropriate action where prohibited items are identified. Breaches of this section may result in disciplinary action, removal of items, restricted or withdrawn site access, and referral to relevant authorities where required.