CORPORATE CODE OF CONDUCT

VRX Silica Limited

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Approved By:

Tony Swiericzuk, CEO

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Revision History

Rev	Date	Revised By	Approved By	Description
2.0	September 2026		Tony Swiericzuk	Periodic review

Approvals

Name	Role	Signature	Date
Tony Swiericzuk	CEO		September 2026

Corporate Code of Conduct

1. Purpose

This Code of Conduct (Code) sets out the standards of behaviour expected of all directors, officers, employees and contractors (Personnel) of VRX Silica Limited and its related entities (Company). The Code reflects our values and ethical standards and aims to promote a culture of integrity, accountability and respect.

The Code applies to all Personnel in the conduct of all Company business, including interactions with customers, suppliers, governments, communities and each other.

2. Values

Our values guide our behaviour and define how we work together and with others. We are committed to demonstrating the following values in everything we do:

2.1 Identity

We are proud of who we are and what we do. We conduct ourselves with professionalism and integrity at all times, and act in a manner that reflects well on the Company and ourselves.

2.2 Accountability

We take responsibility for our actions and decisions. We hold ourselves and others accountable to the highest standards of performance and behaviour. We are transparent and honest in all our dealings.

2.3 Respect

We treat everyone with respect and dignity. We value diversity and inclusion and believe that every person has the right to be treated with courtesy and fairness. We do not tolerate harassment, discrimination or bullying of any kind.

2.4 Collaboration

We work together effectively and share knowledge and information openly. We support our colleagues and recognise that we achieve more together than individually. We seek and value the input of others.

2.5 Excellence

We strive to perform at our best and continuously improve. We take pride in the quality of our work and are committed to delivering outstanding results. We pursue innovation and embrace new ideas.

2.6 Courage

We speak up when we see something wrong. We have the courage to raise concerns, challenge inappropriate behaviour and report suspected misconduct. We support those who raise legitimate concerns in good faith.

2.7 Sustainability

We are committed to conducting our business in a sustainable and responsible manner. We consider the environmental, social and economic impacts of our activities and seek to make a positive contribution to the communities in which we operate.

3. Responsibilities

All Personnel are expected to:

- Read, understand and comply with this Code and all related policies and procedures
- Act with integrity and in accordance with the Company's values at all times
- Report any concerns, suspected misconduct or breaches of this Code promptly
- Cooperate fully with any investigation of alleged misconduct
- Complete required training and attend awareness programs

Directors and senior managers are additionally expected to:

- Demonstrate commitment to this Code through their own behaviour and decisions
- Create an environment in which Personnel feel safe and supported in raising concerns
- Take appropriate and timely action when concerns are raised
- Ensure their team members understand and comply with this Code

4. Compliance with Laws and Regulations

All Personnel must comply with all applicable laws and regulations in every jurisdiction in which the Company operates. This includes, but is not limited to, laws relating to:

- Corporations Act 2001 (Cth) and ASX Listing Rules
- Environmental protection and management
- Health, safety and welfare
- Anti-discrimination and equal opportunity
- Privacy and data protection
- Anti-bribery and anti-corruption
- Trade practices and competition

5. Conflicts of Interest

Personnel must avoid situations where personal interests conflict, or could be seen to conflict, with the interests of the Company. A conflict of interest can arise when personal, financial or other interests could influence, or appear to influence, the performance of duties.

Personnel must disclose any actual or potential conflict of interest to their manager or the Company Secretary as soon as they become aware of it. The Company will determine the appropriate course of action to manage or resolve the conflict.

6. Gifts and Hospitality

Personnel must not offer or accept gifts, benefits or hospitality that could influence or be seen to influence business decisions. Any gifts or hospitality received that exceed nominal value must be declared to the Company.

The Company's Anti-Bribery and Anti-Corruption Policy provides further guidance on acceptable gifts and hospitality.

7. Use of Company Resources

Company resources, including property, equipment, information systems, funds and Personnel time, must be used responsibly and only for authorised purposes. Use of Company resources for personal benefit or for any illegal or improper purpose is strictly prohibited.

8. Confidential Information

Personnel must protect confidential information belonging to the Company or third parties such as customers and suppliers. Confidential information must not be disclosed to unauthorised persons or used for personal benefit.

Obligations regarding confidential information continue after employment or engagement with the Company ends.

9. Securities Trading

Personnel who possess material non-public information about the Company must not trade in the Company's securities until that information has been made public. The Company's Securities Trading Policy provides detailed guidance on permitted and prohibited trading.

10. Financial Reporting and Records

All financial records, reports and other documents must be accurate, complete and maintained in accordance with applicable accounting standards and Company policy. Personnel must never falsify records or misrepresent the financial position of the Company.

11. Health, Safety and Environment

The health and safety of Personnel, contractors and the public is paramount. Personnel must comply with all applicable health, safety and environmental laws, regulations and Company policies. Personnel must immediately report any unsafe conditions, incidents or near-misses.

12. Workplace Conduct

The Company is committed to providing a safe, respectful and inclusive workplace. Harassment, discrimination, bullying or any other form of inappropriate behaviour will not be tolerated. Personnel are expected to treat all colleagues, customers, suppliers and other stakeholders with courtesy and respect.

13. Equal Opportunity

The Company is committed to equal opportunity in employment. All employment decisions will be made on merit and in compliance with applicable equal opportunity laws. The Company does not discriminate on the basis of race, gender, age, disability, religion, sexual orientation or any other protected characteristic.

14. Diversity and Inclusion

The Company values diversity and inclusion and recognises that a diverse workforce brings different perspectives, ideas and experiences that benefit the business. The Company is committed to fostering an inclusive environment where all Personnel can contribute and succeed.

15. Community and Stakeholder Relations

The Company is committed to being a good corporate citizen and making a positive contribution to the communities in which it operates. Personnel are expected to engage with community stakeholders in a respectful, transparent and constructive manner.

16. Indigenous Relations

The Company respects and acknowledges the traditional owners of the lands on which it operates. Personnel are expected to engage respectfully with Indigenous communities and to comply with all applicable laws relating to Aboriginal cultural heritage.

17. Media and Public Communications

Only authorised spokespersons may communicate with the media or make public statements on behalf of the Company. Personnel who receive media enquiries must refer them to the Company Secretary or nominated spokesperson.

18. Social Media

Personnel must comply with the Company's Social Media Policy when using social media in connection with the Company or in a way that could identify them as a Company employee or

contractor. Personnel must not post confidential information or material that could damage the Company's reputation.

19. Anti-Bribery and Corruption

The Company has a zero tolerance approach to bribery and corruption. Personnel must not offer, give, receive or solicit bribes or corrupt payments in any form, directly or indirectly. The Company's Anti-Bribery and Anti-Corruption Policy provides detailed guidance.

20. Reporting Misconduct and Seeking Guidance

Personnel who become aware of any actual or suspected breach of this Code, applicable laws or Company policies are encouraged to report their concerns. Reports can be made to:

- Their immediate manager
- The Company Secretary
- The Chair of the Board
- Through the Company's whistleblower reporting mechanisms

The Company will not tolerate retaliation against any person who raises a concern in good faith. All reports will be treated with appropriate confidentiality.

21. Consequences of Breach

Breaches of this Code may result in disciplinary action, up to and including termination of employment or engagement. In serious cases, breaches may also result in civil or criminal liability.

The Company reserves the right to take any action it deems appropriate in response to a breach of this Code, including reporting the matter to relevant regulatory authorities.

Tony Swiericzuk

CEO

VRX Silica Limited

September 2026