

THE AURELIA WAY

CODE OF CONDUCT





Above: Managing Director and Chief Executive Officer, Bryan Quinn



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FROM THE MANAGING DIRECTOR AND CHIEF EXECUTIVE OFFICER

The Aurelia Way is how we do business.

It encompasses our Purpose and Values, our code of conduct, and our standards and policies. When working with us, you are expected to work with integrity and in accordance with *The Aurelia Way* at all times.

The Aurelia Way describes how we should interact with our colleagues and external stakeholders as we manage our business. Fundamental to this are our Values – Care, Curiosity, Nimble and One Team. They are our greatest opportunity to exemplify the respect we have for the work we do and for the stakeholders we serve.

I stand with our Board and our Leadership Team in support of *The Aurelia Way*. Our code of conduct provides a practical and manageable way for how to conduct yourself during your tenure with our Company.

I encourage you to become an Ambassador of *The Aurelia Way*. Familiarise yourself with this document, our code of conduct, and ensure you incorporate it into your behaviour and into your daily work practices.

If you are placed in a situation where you feel you are required to make a decision not in accordance with any part of *The Aurelia Way*, or witness and/or become aware the behaviours and actions of others that contradict *The Aurelia Way*, you are required to raise your concerns through channels outlined on page 18 of this document.

By working in accordance with *The Aurelia Way* you can expect to work in a respectful, professional, constructive and rewarding workplace of like-minded people who demonstrate high levels of integrity, ethical conduct and responsible business practices.

Aurelia's future successes will hinge on our reputation and the application of our governance framework. Through our people, who with **Care** and as **One Team** remain **Nimble** and approach the future with **Curiosity**, our future remains bright.

I look forward to your ongoing support and commitment to working *The Aurelia Way*.

Bryan Quinn

Managing Director and Chief Executive Officer



OUR PURPOSE AND VALUES AND EXPECTED BEHAVIOURS

OUR PURPOSE

To be a developer and operator of choice for base metals that power the future.

OUR VALUES

At Aurelia, our Values - **Care, Curiosity, Nimble** and **One Team** - represent who we are, what we stand for and how we conduct ourselves. They are at the beating heart of our Strategy and Purpose and represent our greatest opportunity to exemplify the respect we have for the work we do and the stakeholders we serve.



CARE**WE VALUE CARE BY:**

- ♦ respecting our people, communities and the environment
- ♦ acting with integrity and wanting to make a difference
- ♦ doing what's right and owning the outcome of our efforts
- ♦ being committed to safety first.

CURIOSITY**WE VALUE CURIOSITY BY:**

- ♦ being interested in the ideas of others and valuing diverse options
- ♦ asking questions, seeking information and challenging the status quo
- ♦ making informed decisions and learning from successes as well as failures
- ♦ actively seeking innovative ideas and new technologies to improve our business.

NIMBLE**WE VALUE NIMBLE BY:**

- ♦ proactively identifying and addressing emerging challenges and opportunities
- ♦ being open and receptive to change and quickly responding to evolving circumstances
- ♦ making timely decisions based on available information to avoid unnecessary delays.

ONE TEAM**WE VALUE ONE TEAM BY:**

- ♦ actively participating and working together towards shared goals
- ♦ acknowledging and celebrating the achievements of teams and individuals
- ♦ trusting each other and being open, supportive and striving for collective success.

THE RULES TO LIVE BY

At Aurelia, we're committed to protecting the health and safety of our employees, contractors and people living in the communities in which we operate.

Our eight 'Rules to Live By' provide clear expectations to address safety issues that could lead to serious injuries or fatalities at our work sites. Compliance to our 'Rules to Live By' is non-negotiable to all employees and contractors. Failure to comply with any of these rules could lead to disciplinary action, including dismissal.

The Rules To Live By are included across these pages, as well as behaviours associated with their compliance to them.



ALCOHOL AND DRUGS

I will never report to work whilst under the influence of alcohol or drugs.

- ✓ I will only report to work if I am fit for work and free from the influence of alcohol and drugs.
- ✓ I will inform my supervisor if I am taking medication that could affect my fitness for work.
- ✓ I will stop work if I believe someone is under the influence of alcohol and/or drugs.



MOBILE EQUIPMENT

I will never operate any mobile equipment unless specifically trained and properly authorised to do so.

- ✓ I will only operate mobile equipment if I am trained, competent and authorised to do so.
- ✓ I will complete a pre-start inspection on mobile equipment before the shift in which it is to be used. Safety critical faults resulting from pre-start inspections will be escalated and equipment tagged out of service.
- ✓ I will operate equipment in accordance with site traffic rules, speed limits and within authorised areas.



ISOLATION

I will never work on plant and equipment before it has been isolated, tagged and tested for dead.

- ✓ I will only undertake an isolation if I am trained, competent and authorised to do so.
- ✓ If joining an isolation, I will confirm with the person who has control that it is safe for me to do so.
- ✓ I will ensure that all isolation points are correctly identified, locked and tagged so those undertaking the task are protected from any potential energy source.
- ✓ Following an isolation and before commencing work, I will test that the parts to work on, and those nearby, are dead.



PERSONAL LOCK AND TAG

I will never remove, modify or bypass a personal tag or lock unless properly authorised to do so.

- ✓ I will only remove a lock or tag that I have put on.
- ✓ I will only place my personal lock or tag on.
- ✓ I will always remove my personal lock or danger tag at the end of a shift or on completion of a job, whichever occurs first.



SAFETY DEVICES

I will never tamper, remove or modify a safety protection device unless properly authorised.

- ✓ I will understand the safety protection devices that are in place to keep me safe.
- ✓ I will never ignore an alarm or warning from a safety protection device.
- ✓ I will never tamper, removing or modify a safety protection device unless properly authorised to do so.



CONFINED SPACE

I will never enter a designated confined space unless I have a permit and am trained, competent and properly authorised to do so.

- ✓ I will only work in a confined space if I am trained, competent and authorised to do so.
- ✓ I will confirm with my supervisor that atmospheric tests have been conducted and it is safe to start work.
- ✓ I will confirm with the standby person that I may enter the confined space.
- ✓ I will follow the requirements of the confined space permit.



UNSUPPORTED GROUND AND SUSPENDED LOADS

I will never be beneath unsupported ground or a suspended load.

FOR LIFTING

- ✓ I will never enter a suspended load exclusion area.
- ✓ I will follow the requirements of supervisors in charge of a lift.

FOR UNDERGROUND

- ✓ I will never enter areas of unsupported ground.
- ✓ I will ensure I am aware of the hazards and controls.



WORKING AT HEIGHTS

I will never work at heights greater than 1.8 metres or within the prescribed distances of underground voids without fall prevention or fall protection.

- ✓ I will only work at heights if I am trained, competent and authorised to do so.
- ✓ I will use fall protection or protection equipment when working at heights greater than 1.8m or where there is a risk of falling.
- ✓ I will conduct a pre-start inspection of all fall protection equipment.



THE GREEN RULES

Our Green Rules to Live By or 'Green Rules' were established in FY21 following a review of the environmental risks and historical incidents across our work sites.

The Green Rules encourage our people and contractors working at our sites to think and discuss how their actions may impact the environment around them and the communities in which we operate.

During your tenure with Aurelia, you are expected to know and follow our Green Rules at all times.



DISTURBANCES

I will never breach the ground, disturb vegetation, or drive off formed roads unless authorised to do so by the Environment Team.

- ✓ I will always complete a permit to dig/disturb any vegetation or breaching the ground on the surface in any form.
- ✓ I will always drive on formed roads to avoid causing disturbance, obey speed limits and drive to conditions to reduce dust, noise and the chance of causing injury to persons or wildlife.
- ✓ I will immediately cease work and report to my supervisor if I uncover a potential aboriginal artefact.

Causing disturbance that has not been approved could lead to prosecution.



WATER MANAGEMENT

I will never intentionally discharge process/ potentially contaminated water to the ground, outside of a bunded area.

- ✓ I will always identify the water source within any pipeline and discharge in accordance with site procedures.
- ✓ I will always maintain separation of process/potentially contaminated water from other water sources.

Discharging contaminated water outside of a bunded area could lead to the pollution of our waterways.



HAZARDOUS MATERIALS

I will never intentionally discharge hydrocarbons or hazardous materials to the ground, outside a bunded area.

- ✓ I will always store hazardous materials and hydrocarbons in suitably bunded areas, sized to safely contain spills in excess of contained material, and to allow for effective spill response.
- ✓ I will always dispose of hazardous materials and hydrocarbons in accordance with site procedures - if unsure, I will seek advice.

Discharging hazardous substances or hydrocarbons outside of a bunded area, could cause harm to the environment.



WILDLIFE

I will never intentionally harm or interfere with wildlife unless authorised by the environment department.

- ✓ I will always report snake sightings to my supervisor and not interfere with or kill the snake.
- ✓ I will always report injured wildlife to the Environment Team.
- ✓ I will always report deceased animal sightings around the process plant or tailings storage facility to the Environment Team.

Intentionally harming wildlife is a criminal offence.



1 PURPOSE OF THE AURELIA WAY



WHY YOU NEED TO READ AND UNDERSTAND THE AURELIA WAY

The Aurelia Way sets out the standards of behaviour we expect of all business partners including, but not limited to, our Board, employees, contractors, consultants, suppliers, and service providers.

It embodies our commitment to good corporate governance and responsible business practices. It also reflects the expectations of our Board, shareholders, customers, regulators and the community.

The Aurelia Way can help you understand:

- ◆ the Company's Values and expectations regarding your behaviour in work-related situations
- ◆ what to do if you become aware of conduct that is inconsistent with *The Aurelia Way*
- ◆ the Company resources available should you need more information about any topic
- ◆ who to speak with if you have concerns.

The Aurelia Way is not a complete guide to all Company policies and standards. It is therefore essential you familiarise yourself with, and understand all, Company policies and standards relevant to your role.

THE AURELIA WAY APPLIES TO YOU

You need to understand and comply with the standards of behaviours set out in *The Aurelia Way* and take reasonable steps to ensure others you interact with also understand and comply. This is particularly important for those in leadership roles. By working to *The Aurelia Way*, you can be assured you are working ethically and in accordance with our Values.

The Aurelia Way does not cover every possible situation you could encounter during your tenure working at or for Aurelia. It does however provide a common knowledge that will help you practice sound judgement and make decisions in accordance with our Values.

YOUR RESPONSIBILITIES

The Aurelia Way is an important part of your employment and/or engagement with Aurelia.

You are expected to:

- ◆ read, understand and comply with it
- ◆ exercise sound judgement and obey all laws and regulations that apply to your work
- ◆ act in a manner that is safe, ethical, respectful and consistent with our Values, policies, standards, procedures and other work requirements
- ◆ act honestly in all business dealings and maintain the utmost standard of professionalism
- ◆ speak up if you have a concern about any work-related behaviour that does not comply with *The Aurelia Way*, Company policies, standards, or the law

ADDITIONAL RESPONSIBILITIES FOR LEADERS

If you are in a leadership role, you must lead by example and exemplify the behaviours outlined in *The Aurelia Way* by:

- ◆ holding yourself to high standards of conduct and make them clear to your team
- ◆ encouraging employees to speak up if they have concerns and listen and respond respectfully to any concerns raised
- ◆ ensuring no one receives retaliation for speaking up
- ◆ take an active role in understanding the risks inherent in the workplace and implementing appropriate risk management controls
- ◆ Creating an environment free from discrimination, harassment (including sexual harassment), bullying and victimisation.



RAISING A BUSINESS CONCERN IS THE AURELIA WAY

You have the right and responsibility to raise a concern if you become aware of any activity you believe is a breach of *The Aurelia Way* and Company policies and standards, is illegal, unethical, or improper. This will help protect the Company, yourself, your colleagues and our stakeholders. Individuals who report a business concern, who act honestly and with genuine belief about the conduct, will be granted the full protection of the Leadership Team and our Board.

Examples of behaviours that are expected to be reported include but are not limited to:

- ◆ a breach of any Company policies and standards, *The Aurelia Way* or the law
- ◆ fraudulent, corrupt, criminal or other dishonest behaviour
- ◆ the misappropriation of funds
- ◆ payments or solicitation of bribes or other corrupt payments
- ◆ financial irregularities
- ◆ undisclosed conflicts of interest or misleading conduct
- ◆ unsafe work practices and serious incidents affecting our communities, public health or the environment
- ◆ harassment, sexual harassment, bullying, racial vilification or intimidation of employees or other people dealing with Aurelia, including threats of reprisal action against anyone who makes a legitimate report or who is suspected to have or be planning to make a disclosure
- ◆ conduct or practice that may damage Aurelia's reputation, or cause financial loss to the Company.

WHO SHOULD YOU SPEAK TO?

In the first instance, raise your concern with your supervisor.

In situations where this is not appropriate or possible, the matter can be elevated to the next level of management, the Human Resources (HR) or Legal Teams, or a Whistleblower Protection Officer. When none of these is possible, concerns can be raised through contacting Aurelia's Whistleblower Service (**Stopline**).

Stopline is a 24-hour, independent and confidential disclosure service available to all Aurelia employees, contractors, consultants and suppliers 365 days a year. The service affords protection from the fear of retribution for those who wish to raise a concern outside their reporting lines. Concerns can be made anonymously, or named, and with restrictions on who knows the reporting individual's identity.

STOPLINE CAN BE CONTACTED BY:

Telephone: 1300 304 550

Email: aureliametals@stopline.com.au

Online form: aureliametals.stoplinereport.com

Mail: Attention: Aurelia Metals, c/o Stopline, PO Box 403,
Diamond Creek, VIC 3089, Australia

If you raise a concern through **Stopline**, the confidentiality of those involved will be respected. Your identity (if you have provided it) and the information you provide will also only be shared on a 'need to know' basis to address the concern as required by law, or otherwise with your consent.

As outlined in Aurelia's Whistleblower Standard, an investigation process will be initiated if it is determined your concern warrants investigation. If you have provided contact details, you will be updated on the progress of the investigation.

Abuse of the **Stopline** channel will not be tolerated; do not raise a concern through **Stopline** for mischievous or malicious intent. You will not be penalised for raising a concern that does not warrant investigation.

Aurelia does not tolerate any reprisals, discrimination, harassment, intimidation or victimisation against either a person who makes a report or to that person's colleagues or relatives. Retaliatory actions are serious acts of misconduct and will be dealt with in accordance with the Performance and Discipline Procedure.

WHAT STOPLINE IS NOT FOR?

Stopleveline should not be used to raise concerns that should be discussed with your supervisor or for matters related to your employment, wage level or the mid-or full-year employee performance assessments. Where these types of concerns cannot be addressed through your normal reporting lines, please direct your concerns to a HR representative.

HOW WILL AURELIA RESPOND TO BREACHES?

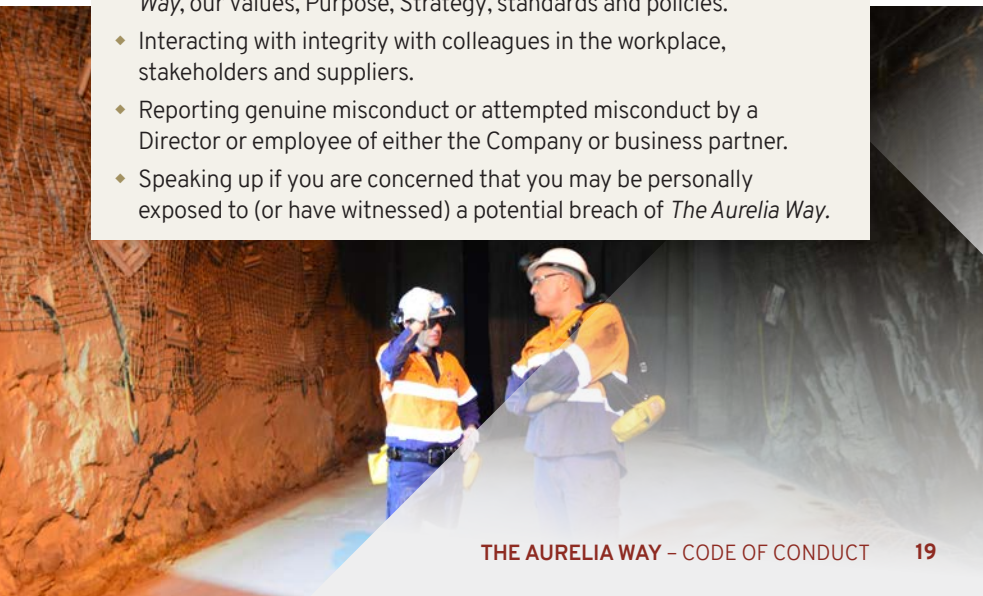
All reported breaches of *The Aurelia Way* are taken seriously and dealt with on a case-by-case basis and in a timely manner. The course of action will depend on the nature and severity of the breach and may include disciplinary action, including dismissal. Relevant authorities will be consulted in relation to breaches of criminal or civil law.

If a supervisor has created an environment that allows breaches of *The Aurelia Way*, or has ignored behaviours that are inconsistent with our Values, they may be held accountable for the actions of their Team.

WORKING THE AURELIA WAY



- ◆ Complying with all legal and regulatory obligations and speaking up if concerned that an obligation is not being met.
- ◆ Consistently modelling positive behaviours aligned with *The Aurelia Way*, our Values, Purpose, Strategy, standards and policies.
- ◆ Interacting with integrity with colleagues in the workplace, stakeholders and suppliers.
- ◆ Reporting genuine misconduct or attempted misconduct by a Director or employee of either the Company or business partner.
- ◆ Speaking up if you are concerned that you may be personally exposed to (or have witnessed) a potential breach of *The Aurelia Way*.



BEHAVIOURS THAT WORK AGAINST *THE AURELIA WAY*



- ◆ Acting dishonestly, in a deceptive, fraudulent or misleading manner, or participating in criminal conduct, including stealing from the Company.
- ◆ Acting violently or in a threatening manner towards colleagues, or causing damage to Company property.
- ◆ Harassing, sexually harassing, discriminating, victimising or bullying, including towards a person who has made or is believed or suspected to have made a legitimate disclosure.
- ◆ Offering or accepting a bribe or facilitation payment
- ◆ Dealing or using illicit drugs in the workplace, or being under the influence of drugs or alcohol while at work.
- ◆ Participating in activities that may cause a serious risk to the health (both mental and physical) and safety of yourself, a work colleague or a member of the public, or cause environmental damage.
- ◆ Turning a blind eye to observed behaviours that you suspect or know to be inconsistent with *The Aurelia Way*.

Q. I overheard a conversation which has me worried that some people at work might be involved in the theft of gold bearing ore. I mentioned it to a supervisor and they seemed angry and told me to mind my own business. I'm reluctant to raise this further because I need my job and I'm also now worried for my safety. What should I do?

A. If you do not feel comfortable raising a concern regarding a potential breach of *The Aurelia Way* with your immediate supervisor, the following options are available:

- ◆ the next level of management
- ◆ HR and/or Legal Team representatives
- ◆ an Aurelia Whistleblower Protection Officer
- ◆ Aurelia's Whistleblower Service, **Stoptline**.

Q. I have been told I need to improve my performance and my boss has started closely checking my work. I don't think they like me because I'm not their drinking buddy. Is this something I should report using the Whistleblower Service?

A. No, **Stoptline** is not intended to be used for employment matters. Speak to a HR Representative as this should be dealt with under Aurelia's **Fair Treatment Standard**.

- Q.** I'm the manager of an onsite service provider to an Aurelia operation. I've been advised during contract renegotiations that a payment needs to be provided to our site procurement officer to guarantee the next contract. I'm concerned with this situation – who should I speak to?
- A.** Discuss your concerns with the procurement officer's supervisor or Manager once Removed if you are comfortable to do so, or otherwise use Aurelia's Whistleblower Service, **Stopline**.

i RAISING BUSINESS CONCERNS

Resources:

Fair Treatment Standard
Whistleblower Standard

Who can I speak to?

Supervisor
Human Resources
Whistleblower Protection Officer
Stopline



2

SUSTAINABILITY



Building and maintaining a trusted, sustainable, and beneficial presence in the areas where we operate is essential to our success. Our approach to sustainability is aligned with our Purpose and Values and aims to deliver shared value across all aspects of the business from exploration to closure, through our people.

Aurelia recognises the need for business management and operating practices that drive towards our sustainability vision.

At Aurelia, Sustainability encompasses our Health and Safety, Environment and Community and Risk Management Teams.

SAFETY

At Aurelia, the health, safety and wellbeing of our employees and contractors is in our DNA. We believe that every injury is preventable and that no task is so important that it cannot be done safely.

We also believe that safety is a shared responsibility. Aurelia provides a safe workplace, sets standards, and implements safe work procedures. You are expected to comply with these standards and procedures.

Your supervisors and leaders will treat your safety and the safety of your fellow workers as their highest priority and you must never compromise your own safety, or the safety of your work colleagues for the sake of production.

We expect that you will contribute to our safety culture proactively and positively through meaningful participation in any current and future safety programs we have in place.

If you are responsible for managing contractors on site, you must also ensure that they are working to the same level as Aurelia's standards and procedures.

Aurelia has identified risks that could lead to a fatality or catastrophic environmental incident at each of our sites through risk assessments. For each of these risks, we have developed **Fatal Hazard Standards** and identified the risk's Critical Controls using the bow-tie methodology. The effectiveness of these Critical Controls is imperative to ensuring these risks are managed and are therefore subject to regular verification.

Aurelia's **Rules to Live By** are applicable to every person at each of our operations. Breaching a rule can have serious consequences including dismissal and, as such, failing to comply with our **Rules to Live By** is treated very seriously in accordance with our **Performance Management and Discipline Procedure**.

Do not start work until you know and are able to comply with Aurelia's **Rules to Live By**. They are designed to keep you safe and provide clear expectations on how to address safety issues which could lead to serious injuries or fatalities in mining environments. If there is any doubt about your ability to follow any of the **Rules to Live By**, stop work immediately and discuss the situation with your supervisor.

Before commencing each work task, we require you to conduct a risk assessment using the **Take 5** process as a minimum for routine tasks in a normal environment. **Job Hazard Analysis' (JHA)** should be completed for all routine tasks in an abnormal environment when no **Standard Operating Procedure (SOP)** exists, and for non-routine tasks in a normal environment.

If you have safety concerns about the task, you should stop, identify and control hazards and if necessary, not proceed with the task until you have discussed with your supervisor how the work can be controlled and completed safely.

Speak to your supervisor if you have any concerns about you or anyone else's ability to start or continue work as outlined in our **Fitness for Work Standard**. The primary way of assessing your fitness-for-work is through face-to-face discussions with your team and leaders. Where appropriate, other assessment methods can be utilised, these include:

- ◆ personal wellness and fatigue self-assessment and reporting
- ◆ risk assessment of high risk and repetitive work
- ◆ alcohol and drug testing
- ◆ pre-employment or periodic medical assessment
- ◆ other recognised assessments as appropriate.

Aurelia has zero-tolerance for people arriving to site under the influence of non-prescribed drugs or alcohol and therefore we provide an opportunity to self-test for alcohol before arriving onsite. If you breach this expectation, it will be a breach of our **Rules to Live By** and therefore our **Performance Management and Discipline Procedure** and you can expect serious consequences up to and including dismissal (for employees) or being barred from Aurelia sites (for contractors).

RISK MANAGEMENT

At Aurelia, the management of risk is essential for the protection of workforce and our assets, and for the creation of business value. Our approach to risk management provides confidence to our employees, contract partners, host communities, shareholders, regulators and other stakeholders that our material and significant risks are identified and effectively managed.

Our Risk Management Framework is described in the **Risk Management Policy**, **Risk Management Standard**, and **Risk Management Procedure**. These documents are supported by the risk management toolkit. Selection and use of a risk assessment and/or management tool will depend on the activity and level of risk. Tools include but are not limited to:

- ◆ Take 5s
- ◆ Job Hazard Analysis (JHA)
- ◆ Workplace Risk Assessment and Controls (WRAC)
- ◆ Risk Assessments
- ◆ Risk Registers
- ◆ Trigger Action Response Plans (TARP), and
- ◆ Bowtie Risk Analysis.

Registers for Group-level risks, and risks at each operating site and project, are reviewed at least every six months. In the event of an incident, the appropriate register will be reviewed and updated if required.

Uncontrolled change poses risks to our business, with possible consequences ranging from minor interruptions and inconvenience to serious injuries to our employees and/or contractors, and damage to the environment, community, and/or our assets. The **Management of Change Standard** and **Management of Change Procedure** protects Aurelia from these risks.

You must assess the risks associated with a planned change using the steps laid out in the Management of Change Procedure if you or your team are about to make a change to:

- ◆ an existing process/es
- ◆ system/s
- ◆ licences or consents
- ◆ supply chain arrangements or agreements,
- ◆ organisational units or teams
- ◆ facilities, plant, equipment and/or infrastructure.

HEALTH AND WELLBEING

We believe it's our duty of care to provide a psychologically safe and healthy workplace that promotes mental health and wellbeing and protects mental health by reducing work-related risk factors and actively addresses and prevents mental illness and injury from occurring.

Our **Employee Assistance Program** provides free and confidential advice and coaching to our workforce and their immediate families. These trained professionals are available 24 hours a day, all year round for face-to-face or telehealth counselling and support.

We have partnered with an external provider to provide mental health training to our workforce. The four-stage program includes awareness, education, training, and resources and aims to improve literacy and resilience and reducing the stigma that surrounds reporting and managing mental health issues.

We recognise that flexible work can improve psychological and physical health and wellbeing by enabling people to manage demands and responsibilities and promotes a healthy work-life balance. Further details on the types of flexible working arrangement available can be found in our **Flexible Working Arrangements Standard**.

AURELIA EMPLOYEE ASSISTANCE PROVIDER

Drake WellbeingHub

Website: drakewellbeinghub.com.au

Phone Number: 1300 135 600

WORKING THE AURELIA WAY



- ◆ Complying with Aurelia's **Rules to Live By**.
- ◆ Conducting a quality **Take 5** (as a minimum), including hazard identification and putting the correct controls in place before commencing every task.
- ◆ Being fit for work, physically and psychologically, to be able to undertake your work safely.
- ◆ Advising your supervisor if you have doubts about your own, a colleague's, or a business partner's, fitness for work.
- ◆ Feeling safe to speak up on issues about psychosocial safety, mental health and supporting your workmates.



- Q.** On my shift last night, I accidentally reversed into a vehicle. No one was injured and you can barely see a mark on either vehicle. Do I need to report it?
- A.** Yes. You are required to report all accidents and near misses, so that they can be fully investigated, and actions put in place to prevent reoccurrence. While no one was injured this time and the consequences were minor, there may be learnings to be shared with your colleagues that could prevent a more serious outcome.
- Q.** It's close to the end of my shift, I haven't finished all my safety isolations, and my supervisor is demanding that we meet our daily production targets. To complete my assigned jobs for the day, I know I will have to break one of Aurelia's **Rules to Live By**. My supervisor says that because we are contractors, we work to our own safety standards. I want to reach our targets and don't want to let my team down. Is it ok to just get on with it?
- A.** No. This is never justified. Your personal safety and the safety of others is our top priority. You are expected to follow the *Rules to Live By*, regardless of your status as a contractor. Furthermore, this type of behaviour could result in someone being injured or you and your supervisor being barred from Aurelia sites. Discuss your concerns with your supervisor directly or, if their behaviour does not match our expectations, through your manager once removed. If you are not comfortable doing either of these, speak with your Aurelia Contract Manager and/or a member of the Aurelia Safety Team. If none of these steps is appropriate, you can report the behaviour through the Aurelia Whistleblower Service, **Stopline**, which allows you to remain anonymous if you choose.
- Q.** One of my work colleagues has not been himself recently. There are times when he doesn't seem alert and I've even had to intervene in a job we were doing when he missed some steps from the procedure. I've seen him take some tablets in the crib room and I'm worried the medication is affecting his performance. I don't want him to lose his job but I'm worried for his safety and the safety of others. What should I do?
- A.** Your colleague's fitness for work may be impaired by his medication. Aurelia requires everyone to declare their medication before they start work, even if it is not an illegal substance. You should make your colleague aware of this requirement, and if not addressed, through observable steps (such as declaring medication to their supervisor and/or site safety representative), report the matter to your supervisor so it can be investigated further, and necessary steps taken to keep your colleague and others safe.

- Q.** One of the guys on my crew is going through a pretty tough divorce. I can tell it's causing him a lot of stress and he's trying to keep a brave face for his kids. The pressure of our shifts and long hours on top of what he's going through is intense. This isn't a work-related issue so what should I do?
- A.** Firstly, it's great that you recognise a change in your crew mate's behaviour or mental health, and you can support your crew mate through this difficult time. Often people need to know they have someone that recognises what they are going through and can be a sounding board if they need. If you feel comfortable you could tell your crewmate in private that you are always around to chat if he needs to. You could provide him with the details of our **EAP**, it doesn't matter that the issues are non-work related, all employees and their immediate families have access to the **EAP** for 24/7 confidential counselling. This means his kids and ex-wife can access the service as well. Our Safety and HR Teams have also been trained in Mental Health First Aid, so if you believe that he could use the additional support, reach out to them to explain the situation.

i SAFETY, RISK MANAGEMENT, AND HEALTH AND WELLBEING

Resources:

Fatal Hazard Standards
 Fitness for Work Standard
 Rules to Live By
 Risk Management Framework
 Take 5
 Performance Management and Discipline Procedure
 Flexible Working Arrangements Standard
 Risk Management Policy
 Risk Management Standard
 Risk Management Procedure
 Management of Change Standard
 Management of Change Procedure

Who can I speak to?

Supervisor
 Human Resources Team
 Safety Team
 Business Improvement Team

ENVIRONMENT

We acknowledge the risks to the environment inherent in our operations. From exploration and development, through to operations and into closure, we steadfastly endeavour to mitigate our impact to biodiversity and preserve the natural environments we share with our communities.

During your tenure with Aurelia, you are expected to use natural resources carefully. This includes being water and energy efficient, minimising land disturbance, preventing pollution and applying sound practices to land use planning, rehabilitation and preserving biodiversity.

You are also expected to know and follow our **Green Rules** and incorporate environmental risk management into your day-to-day activities. If you are responsible for managing contractors on our site, you must also ensure they are working to these expectations.

Breaching a *Green Rule* is taken seriously and could result in disciplinary action up to and including dismissal (in the case of employees) and being permanently barred from Aurelia sites (for contractors).

FIRST NATIONS ENGAGEMENT

We value the relationship we have with the First Nations Peoples on whose land we operate, and acknowledge their rights and interests to protect and manage their cultural heritage. Their engagement through exploration and discovery, to mine development, operations and into closure is invaluable. We respect the responsibilities and obligations First Nations Peoples have for country.

We take our obligations to respect culture and protect sacred sites and artefacts on our mining leases very seriously. For this reason, you are expected to always follow our **Green Rule Disturbance**.

As an employee or contractor at Aurelia, you are expected to participate in cultural heritage training and conduct your work in a respectful manner that complies with these requirements. If you become aware of any potential items or places of cultural heritage significance while conducting your work, you are expected to stop work immediately and report this to the Environment and Community Team so it can be dealt with in accordance with our cultural heritage management plans.



OUR COMMUNITIES

At Aurelia, we're committed to ensuring our presence has a positive impact in the communities where we operate and our long-term relationships create shared and enduring value.

We understand that our business can potentially impact local communities. We work with relevant stakeholders, especially those most affected by our operations, to identify and address their concerns and expectations.

Through understanding and a collaborative approach, we ensure mutually beneficial opportunities and outcomes to improve the overall quality of life within our local communities. By taking community members' views into account, informed decisions are made for support programs and prioritising local employment and procurement of goods and services through local businesses

As an employee or contractor of Aurelia, you are expected to demonstrate respect for our local communities through your words and actions and recognise that your behaviours at work and in our communities have the potential to impact the Company's reputation. This extends to your presence when residing in a camp environment and/or in Company accommodation. Prior engagement and planning are required before conducting any work on land belonging to our neighbours.

Environment and Community Team representatives at site locations ensure consistent, open and transparent communication with communities. Communication and commitments to our community must be coordinated through these representatives.



WORKING THE AURELIA WAY

- ◆ Understanding our standards and the environmental management plans that apply to your role.
- ◆ Following the **Green Rules** and consulting your supervisor if you are unable to meet these requirements.
- ◆ Demonstrating respect and courtesy towards members of the local community and First Nations Peoples.
- ◆ Avoiding behaviours that could harm Aurelia’s reputation or relationship with our local communities.
- ◆ Stopping work and reporting if you find any potential cultural heritage/historic artefact or site.

BEHAVIOURS THAT WORK AGAINST THE AURELIA WAY

- ◆ Ignoring or knowingly disregarding a **Green Rule**.
- ◆ Covering up or hiding an environmental incident.
- ◆ Ignoring, interfering with or concealing a cultural heritage find.
- ◆ Causing damage to community owned or private facilities.
- ◆ Displaying abusive, offensive or aggressive behaviour or using language that may cause offence in a public place during work time or while living in camp or visiting our local communities.

Q. I observed someone cutting down a dead tree on an Aurelia mining lease, appearing to be collecting firewood. I didn’t think anything of it at the time. On reflection, I think it may have contained hollows suitable for wildlife habitat. Should I have reported this behaviour?

A. Yes, Aurelia’s rights differ from those of other local land users including our farming communities. Aurelia is not permitted to cut down standing dead trees or collect wood as it may provide a habitat for protected native fauna. Unless it is for a use that is specified in the site’s biodiversity management plan and/or authorised under Commonwealth and State legislation, we are unable to take timber from our sites. The same principles apply to disturbing land on our mining leases or properties. Speak to your site’s Environmental and Community Team if you are unclear of your environment-related obligations.

- Q.** I was at the local pub last night and I witnessed a fight between two contractors who were working on an Aurelia site. Should I report this behaviour?
- A.** Yes, due to the small communities that we typically work in our employees and contractors are always representing Aurelia, whether they are in uniform or not. Behaviour such as this reflects on the individual as well as Aurelia and has the potential to jeopardise our relationship with the community. Report this to your HR representative or the contract manager.
- Q.** On the job, we uncovered some stones that looked like First Nations hand tools. My boss told me not to worry about it and get on with the job. What should I do?
- A.** You are required to stop the job immediately and report any potential artefacts to your site's Environment and Community Team so that it can be addressed lawfully. First Nations artefacts of any size, shape or number are very precious and protected by Commonwealth and State legislation. You should also be aware that it is a breach of our cultural heritage management plans to pick up or relocate First Nations artefacts unless we have been authorised by a government official and local First Nations representatives.

i ENVIRONMENT AND OUR COMMUNITIES

Resources:

Sustainability Policy and Standards
Green Rules
Environment Management Plans

Who can I speak to?

Environment Team
Community Team
Legal Team

3 WORKPLACE BEHAVIOURS



DIVERSITY, EQUITY AND INCLUSION

At Aurelia, we recognise that a diverse workforce offers a wide range of perspectives and unique skills and experiences that enhance decision making and contribute to better business outcomes.

We are committed to growing a diverse workforce and work environment in which every employee is treated fairly, respected and has the opportunity to contribute to business success, while being given the opportunities to realise their full potential as individuals.

You are expected to embrace our commitment to inclusion at all levels of the Company regardless of the below protected attributes:

- ◆ race
- ◆ ethnicity
- ◆ colour
- ◆ gender
- ◆ age
- ◆ physical or mental disability
- ◆ marital or relationship status
- ◆ family or carer's responsibilities
- ◆ pregnancy
- ◆ religion
- ◆ political opinion
- ◆ national extraction or social origin
- ◆ sexual orientation, gender identity or intersex status.

Discrimination is defined as differential treatment or consideration based on a protected attribute rather than individual merit. Direct discrimination refers to the treatment, or the proposed treatment, of a person less favorably or unequally on the grounds of certain characteristics or attributes.

Generally, indirect discrimination occurs where policies and practices, which appear to be non-discriminatory, operate so as to unreasonably disadvantage one person or a group of people when compared with another. Both direct and indirect forms of discrimination are not tolerated at Aurelia.

You must work in a way that respects and values the differences between individuals, and any form of sexism, racism, discrimination, bullying, harassment (including sexual harassment), vilification and victimisation, cannot and will not be tolerated.

Aurelia is an equal opportunity employer. Our hiring practices, including internal promotions, require recruitment decisions to be based solely on a person's skills, qualification and merit. A person cannot be prevented from participating in this process. We protect a fair and equitable system of recognition, remuneration and promotion based on high performance, where self-improvement is rewarded.

The Company will ensure there are opportunities for employment within the communities where we operate. This is particularly important in our regional communities where opportunities may be limited for locals and/or First Nations peoples.

Training and development for our employees is fundamental to retention, morale, our operational performance and the achievement of our Strategy. We provide employees with essential tools to develop their skills and competencies, including regular performance reviews, recognising and developing potential, undertaking education, training and coaching (as appropriate) and offering appropriate professional development opportunities.

- Q.** I am recruiting for a remote job on site that also involves shift work. One of the candidates is a single parent and I don't believe they will be able to cope with the roster even though their qualifications and skills are right for the job. Can I exclude the candidate from the interview process because I believe this is in the best interest of the Company?
- A.** Excluding this candidate based on your assumption would be a breach of *The Aurelia Way*, the **Diversity, Equity and Inclusion Policy** and is unlawful. The candidate should not be discriminated against based on their personal circumstances, including their family responsibilities. Aurelia is an equal opportunity employer and the candidate selection must be made based on job-related skills, qualification and merit. You must ensure you give all candidates detailed information regarding the roster and nature of the work. Each candidate is then responsible for determining whether these will align with their personal circumstances.
- Q.** We are recruiting for two urgent positions at an Aurelia operation. Another nearby mine I know is closing and I can recruit people from there easily but they are all male. I know Aurelia has a **Diversity, Equity and Inclusion Policy**, but it will take too much time to have an open recruitment process. What should I do?
- A.** You should use an open recruitment process and encourage a diverse range of applicants to also apply for these roles. All people who have the skills and experience to do the work must be considered, regardless of personal characteristics. Holding a closed recruitment process is not aligned with our **Recruitment and Selection Procedure** and will limit our access to a wider, rich talent pool.

INDIVIDUAL PERFORMANCE

At Aurelia, we are accountable for our own actions and deliver on our commitments.

During working hours, you are expected to prioritise work and always act in the Company's best interest. While performing your work, you are expected to behave in a manner consistent with our Values, the standards and behaviours set out in *The Aurelia Way* and other Company policies, standards and procedures that apply to your role.

We are committed to a performance-based culture whereby competitive remuneration and rewards are aligned to Company business plans and shareholder objectives. Your supervisor will provide you with performance expectations as part of the Annual Performance Review Cycle, which is in place to support you in achieving your agreed goals, and provides regular opportunities for formal and informal two-way feedback.

Every employee has an individual Performance and Development Plan (PDP) which outlines individual performance targets, identifies development needs and opportunities and assess an employee's alignment to key behavioural indicators set out in *The Aurelia Way*.

If performance expectations are not met, you will be provided with a forum for discussion and a process to formally identify and address concerns, and reasonable opportunity and support to assist in improving performance.

Ongoing performance and behaviour issues may require the use of Aurelia's **Performance Management and Discipline Procedure** and **Fair Treatment Standard** to ensure the fair and consistent treatment of employees while providing a robust process to investigate and address more serious problems with work performance in a constructive manner.

Coaching and counselling are the preferred methods for improving performance in the first instance. You may be put on a formal Performance Improvement Plan to ensure your supervisor's expectations are clearly defined and to track your improvement against these expectations.

Disciplinary action will be administered in cases of ongoing unsatisfactory performance or serious misconduct. In such circumstances, fair and equitable disciplinary practices will be observed.

- Q.** I recently reported my supervisor for a significant safety breach. Since then, he has issued me with a disciplinary letter for not meeting a deadline. This was the first time I have not met a deadline and my supervisor is aware that I was reliant on inputs from others which were late, and that I put in extra effort to keep the project on track. I am worried he is treating me unfairly because I made the earlier safety report. What should I do?
- A.** Disciplinary matters of any sort are taken seriously by Aurelia, and retribution for a genuine issue that has been raised is unacceptable. Aurelia's **Fair Treatment Standard** provides a right of appeal to ensure that disciplinary matters are reviewed objectively, fully investigated and there are no adverse actions made towards you by anyone in the business for raising a legitimate concern. You should raise this issue with your manager-once-removed and/or through a HR representative.

BULLYING, HARASSMENT (INCLUDING SEXUAL HARASSMENT) AND VICTIMISATION

We expect everyone working with or for Aurelia to model the highest standards of ethical behaviour. We treat each other and those we deal with externally with dignity, fairness and respect at all times. We promote a work environment that is free from hostility, offensiveness and intimidating behaviours. We have no tolerance for any form of harassment (including sexual harassment) in the workplace.

Leaders have a duty of care to provide a workplace free from bullying, harassment (including sexual harassment) and victimisation. It is your right to work in an environment that is safe and free from harassment, bullying, intimidation and other offensive behaviours. In return, we expect that you do not engage in harassment, bullying or other inappropriate behaviour, including those identified in *The Aurelia Way* and the **Workplace Behaviour Standard**.

Workplace harassment comes in many forms and is generally unwelcomed behaviour that causes another person distress, and/or seriously offends, humiliates or intimidates another person/s. It includes unwelcome conduct of a sexual nature.

Workplace bullying occurs when a person or a group of people repeatedly behave unreasonably towards a worker or a group of workers and this behaviour creates a risk to their health (physical and/or mental) and safety.

EXAMPLES OF BEHAVIOURS THAT ARE NOT TOLERATED INCLUDE, BUT ARE NOT LIMITED TO:



- ◆ Behaviour that would bully, intimidate, humiliate or embarrass a reasonable person.
- ◆ Pressuring someone to behave inappropriately.
- ◆ Setting unreasonable work demands.
- ◆ Sexual harassment, including sexual advances or requests, or any unwelcome conduct of a sexual nature.
- ◆ Stalking or making written or verbal threats or insults.
- ◆ Harassment in relation to an employee's disability.
- ◆ Victimisation where an employee/s are subject to unacceptable behaviour because they have assisted, or were in some manner involved or suspected to be involved in a complaint regarding a breach of *The Aurelia Way*.

If you experience or witness such conduct, in the first instance you should address the matter with the individual or group involved. If this is difficult or inappropriate, the matter should be raised immediately through your supervisor or manager-once-removed. We encourage you to be an active bystander which means being aware of when someone's behaviour is inappropriate and choosing to do something about it. You may witness the behaviour directly or be informed about it after the fact when victims or harassers are seeking advice or support. If one of these people are the cause of your concern, raise the concerns via a Whistleblower Protection Officer or Aurelia's Whistleblower Service, **Stoptime**.

Q. At our last team meeting, my supervisor made several sexist remarks towards women but said I was the exception. I found the remarks offensive and inappropriate however I didn't say anything because the rest of the team laughed along, and I am the only woman in the team. I'm not sure what to do as it's hard enough to fit in. Should I say something to my supervisor?

A. The misconception that banter is less serious than other forms of sexual harassment is not true. People who pass offensive and demeaning comments off as 'just joking' are committing sexual harassment which is strictly against Aurelia's Values and is not acceptable in our workplaces. Employees observing this type of behaviour also have a responsibility to

call it out, report it, and not stand by. Consider raising your discomfort about the remarks with your supervisor in private. As an employee of Aurelia with leadership responsibilities, the supervisor will be aware of *The Aurelia Way* and the consequences of such behaviour. They should then take positive and constructive steps to address their own behaviour and the behaviour of others in the team. If you're not comfortable with the response and/or if you hear your supervisor or team members repeating such remarks, speak with your manager-once-removed, a HR representative or the Whistleblower Service, **Stopline**.

- Q.** A new guy commenced in my crew and he introduced himself as Yìchén. Some people tried to pronounce his name while sniggering and told him he would now be known as 'George' because it was easier to pronounce. A few of the guys in the crew have started mocking Yìchén when he doesn't understand Australian slang words and have told him that if he doesn't start swearing, he's 'un-Australian'. I can tell it's making him uncomfortable and he's just laughing along to be accepted into the team. Should I say anything?
- A.** Yes, this behaviour is a form of bullying and discrimination and breaches our **Diversity, Equity and Inclusion Policy** and our Workplace Behaviour Standard. You should first approach Yìchén and offer to assist him in reporting the behaviour to your supervisor. If he is not comfortable with the response and/or your supervisor was involved in the behaviour, he should speak to his manager-once-removed, the HR Team, or the Whistleblower Service, **Stopline**.
- Q.** My supervisor pointed out several areas where I missed the mark during my performance review. They provided a detailed list of examples where my work didn't meet their standards. I feel quite upset and picked on. My supervisor told me they will arrange another meeting in a month and has documented where I need to improve prior to the next meeting. I'm feeling bullied and harassed. Am I right to feel this way?
- A.** The Company expects feedback and coaching from a supervisor to an employee in their role. This is not bullying or harassment, provided it is carried out in a way that is not humiliating or insulting. A supervisor has the right and obligation to counsel employees on their performance provided it is factual feedback that includes examples and it is stated in a way that shows due respect to the other person.
- Q.** I have been seconded to another Aurelia operation and I've been included in an inappropriate email, including explicit sexual images, that is being shared around site. The images are not what I would expect to see in my inbox. What should I do?
- A.** Do not share the email further and report any behaviour that may offend a reasonable person, even if you are not personally offended.

This includes material on Company property such as the images you described. Report it to your supervisor who has an obligation to address it with those concerned or, if you are uncomfortable with this approach, or the matter is of a serious nature, report it to the HR Team.

- Q.** I have just started working for Aurelia and my new supervisor keeps offering to buy me dinner so that we can get to know each other. She texts me after hours and complains that she is 'lonely' because I won't go to dinner with her. I asked my other team members if they were taken out to dinner when they started and they told me they weren't. She makes me feel uncomfortable and I've repeatedly rejected her offers. She's starting to get frustrated by my rejections and I'm worried it's affecting our working relationship. I love my new job and I don't want to jeopardise my position here. What should I do?
- A.** Persistent requests to meet up outside of work hours despite your ongoing refusal is a form of sexual harassment. Aurelia has zero tolerance for this behaviour. You can report this behaviour to your manager-once-removed, the HR Team, or call our Whistleblower Service, **Stopline**.

WORKING THE AURELIA WAY



- ◆ Demonstrating respectful and professional behaviour, and acting with dignity in all business interactions.
- ◆ Taking action to prevent and stop discrimination, harassment, bullying, victimisation or vilification. Supporting those that may be affected by an incident.
- ◆ Treating everyone equally and embracing differences.
- ◆ Basing all work-related and employment decisions on merit, performance and potential.

BEHAVIOURS THAT WORK AGAINST *THE AURELIA WAY*



- ◆ Engaging in discrimination, harassment, bullying, victimisation or vilification.
- ◆ Disrespecting individual perspectives, cultures and beliefs.
- ◆ Making inappropriate jokes, humiliating a colleague, spreading rumours or other coercive and controlling behaviours.
- ◆ Threatening physical or verbal abuse.
- ◆ Disqualifying a job candidate because of their cultural background, gender, age, disability, religion or sexual orientation.



WORKPLACE BEHAVIOURS AND EMPLOYEE PERFORMANCE

Resources:

Diversity, Equity and Inclusion Policy
 Recruitment and Selection Procedure
 Performance Management and Discipline Procedure
 Fair Treatment Standard
 Workplace Behaviour Standard

Who can I speak to?

Supervisor
 Manager-once-removed
 Human Resources
 Stopline/Whistleblower Protection Officers



PRIVACY AND PERSONAL INFORMATION

At Aurelia, we treat employee information with care by respecting the privacy of individuals and by complying with relevant laws on the management of personal information.

We only collect and retain the personal information of our employees, shareholders, customers, business partners and suppliers that's reasonable and necessary to meet business requirements and as permitted by law.

Personal information is information relating to an individual where anyone reviewing that information could identify the individual and, therefore, needs to be treated carefully and sensitively. The type of personal information that Aurelia collects and holds includes:

- ◆ personal and/or business details necessary to conduct our business transactions
- ◆ information required for the purpose of maintaining business relationships
- ◆ information related to recruiting personnel and performance management
- ◆ safety and emergency information, such as certain employee health records and contact details
- ◆ details of any visitor, stakeholder or an individual making an enquiry or complaint.

Any sensitive information we hold will only be disclosed for the purpose for which it was collected, or for directly related matters that are necessary and reasonable. We also only share this data with others when it is necessary, where there is a contract in place, and/or when we are sure those receiving the data understand the importance of keeping it private.

If your role requires the collection of personal information, you are obliged to respect that information and keep it private and protect it from deliberate or accidental disclosure, and/or unauthorised access, at all times. You must not use it in an unauthorised way. Employees must not access personal data unless authorised to do so.

Our **Privacy Policy** details the types of information we collect, why and how we collect it, how it is stored and secured, who it is shared with, and how access to personal data we hold may be requested by an individual.

We respect the rights of every person to review, update and, if necessary, correct the record of information held.

If you require further information on privacy matters relating to Aurelia, or wish to exercise your rights, you should speak to your supervisor, a HR representative, or email Aurelia's Privacy Officer who can be contacted at privacy.officer@aureliametals.com.au.

- Q.** I received a phone call from someone I didn't know, who said they know one of my direct reports. They said they had arranged to collect the employee's family members this afternoon and were running late and wanted me to pass on the employee's contact details to let them know. What should I do?
- A.** Providing contact information for an employee or their family members to an external third party could be a breach of privacy laws. Employee contact information should remain confidential at all times. You should ask the caller to provide their details and tell them you will request ask the employee to call them back.
- Q.** I work in the Finance Team and have access to employees' personal records for the purpose of paying their salary. One of my colleagues, and a close friend I trust, has asked me to provide to them with the contact details of a co-worker they would like to ask out socially. Can I provide a phone number?
- A.** No. You should only provide contact details if it is for a legitimate work purpose or for the purpose you were provided access to the information. In this case, you are provided access to ensure that employees are paid their salaries, and this request falls outside this scope. Advise your colleague you cannot provide this information due to privacy laws and the Company's **Privacy Policy**.
- Q.** I work in payroll and another Team has requested I provide personal details, including salary information, for every Aurelia employee for an external report about gender statistics to the government. I know I'm only supposed to provide information for its intended use, which for my role, is to pay people. Who should I check with to make sure I'm not in breach of my legal obligations?
- A.** Check with your supervisor and/or Aurelia's Privacy Officer. In this case, Aurelia is legally obliged to provide this information to government agencies and will comply with the request. The data should be compiled and de-identified before sent for the reporting purposes. When providing this data to a work colleague, limit its distribution to only those that require access to meet Aurelia's reporting obligation and password protect the information if necessary. You should also advise the recipient of their obligation to maintain the strict confidentiality of the information and to only use the information for its intended purpose.

WORKING THE AURELIA WAY

- ◆ Speaking with Aurelia's Privacy Officer before starting a new project that involves personal data.
- ◆ Protecting personal information and keeping it confidential and secure.
- ◆ Collecting and retaining only necessary personal information for relevant business activities.
- ◆ Destroying or deleting personal information when it is no longer required, or following a period of time that is required by law.

BEHAVIOURS THAT WORK AGAINST THE AURELIA WAY

- ◆ Accessing personal data that you are not authorised to access.
- ◆ Using personal data that you have access to for an unauthorised purpose.
- ◆ Providing personal information to anyone without appropriate authorisation or the express permission of the individual (except where required by law).

i PRIVACY AND PERSONAL INFORMATION**Resources:**

Privacy Policy

Who can I speak to?

Supervisor

Human Resources

Privacy Officer

4 OPERATING WITH INTEGRITY



CONFLICTS OF INTEREST

You must not use your decision making or influential position at Aurelia for personal gain, or to further the interests of a relative, friend or a business in which you have an interest. Such business dealings or personal relationships may create, or be perceived to create a conflict with your obligations to Aurelia and affect your ability to make clear, objective decisions for the Company.

There are many ways that conflicts of interest can arise. For example:

- ◆ Any approval, contract, purchase order, reference or recommendation made by you on behalf of Aurelia with any supplier or organisation with which you have a personal interest, close relationship or family connection.
- ◆ Hold a position as a board member of another organisation outside of work.
- ◆ Have a business interest in a private company, which is related to your work at Aurelia.
- ◆ Hold another job outside Aurelia which prevents you from fully devoting your time to your job.
- ◆ Have a relationship (intimate or immediate family member) with another employee at work that could create a situation or perception that you can influence their salary, performance rating or promotion. Conflict can also arise where the relationship extends to a representative of a business partner or competitor of Aurelia.

Conflicts of interest will inevitably arise from time to time. A conflict of interest is where your personal interests may conflict or be seen to conflict with your work duties, responsibilities or decisions, or where you seek to use your position to gain advantage for yourself or others. **Aurelia's Anti-bribery and Corruption Standard** outlines that conflict of interest situations and external commitments which are not disclosed and approved, or which are not properly managed, can give rise to a perception of corrupt or inappropriate conduct.

It is your responsibility to appropriately declare and avoid any conflicts of interest. If you identify an actual, perceived, or potential conflict of interest, you should declare it and discuss how the conflict might be managed with your Supervisor. For this purpose, please refer to the **Conflict of Interest/ Gifts & Hospitality Declaration Form**.

You should also notify your Supervisor regarding any changes. That is, if you have declared a conflict of interest but your role changes, your Supervisor changes, or other circumstances which make your declaration no longer accurate, then you should notify your Supervisor and provide an updated declaration.

WORKING THE AURELIA WAY 

- ◆ Disclosing when you have an actual, perceived or potential conflict of interest as soon as possible.
- ◆ Withdrawing from decision making that creates, or could be perceived to create, a conflict of interest.

BEHAVIOURS THAT WORK AGAINST THE AURELIA WAY 

- ◆ Engaging in, or having a concern in, any other activity or interest which prevents you from being fully devoted to your duties without the consent of the Company.
- ◆ Hiding or failing to disclose a conflict of interest

Q. My daughter is a partner in a consulting firm that specialises in cultural heritage services that Aurelia needs advice on. Can I recommend the firm?

A. Yes, you can inform Aurelia about the services offered by the Company, however you must be completely transparent about your relationship and not be involved in procurement processes. Make it clear that you have no problem if your daughter and her consulting firm are unsuccessful to avoid any real or perceived expectations or pressures around the potential engagement of the consulting firm.

Q. I work in an administrative role and sometimes I've been asked to perform work for my manager's personal business during work time. I don't want to get anyone into trouble, and I don't want it to affect my performance reviews, but I don't think I should be asked to do work where it doesn't concern the Company. What should I do?

A. You should not be asked to work on personal business matters or use Aurelia property, including IT systems, for these purposes. You should raise this with your supervisor if you feel comfortable to do so, otherwise report this to your manager-once-removed, the HR and/or Legal Teams, or to the Whistleblower Service, **Stoptline**.

- Q.** My Team Manager has entered a relationship with my superintendent. It's clear that they're having closed door meetings, taking rostered breaks together and aligning annual leave. The superintendent is also being given privileges and special project work, despite not performing well in their role. I recently requested to attend a conference related to my work and had it rejected due to budget constraints. I've since found out that my superintendent was approved to attend. What should I do?
- A.** You should report this to your General Manager, the HR or Legal Team or use the Whistleblower Service, **Stopline**. It's important that personal relationships don't influence business decisions and interactions with other staff. A personal relationship in a direct reporting line is not acceptable as it may affect a supervisor's ability to act impartially and in the best interest of Aurelia, including in decision making, recruitment, disciplinary processes, remuneration processes, development opportunities and maintaining confidential information.
- Q.** I currently work for Aurelia in the Maintenance Team but on my off-swing I run a successful landscaping business. My supervisor mentioned that our site needs landscaping and that I should send a quote through to our Commercial Team for consideration. Is there anything wrong with that?
- A.** You can send in a quote for the landscaping work; however, the assessment of that quote must be undertaken by an individual or team that is completely independent of you (ie. you cannot be involved and neither can your supervisor). There is no guarantee that you will be awarded the work because you are an Aurelia employee. In addition, you must not be able to access any information about other quotes or competitors. If your quote is successful, you must ensure any work undertaken privately does not impact your employment with Aurelia.

i CONFLICT OF INTEREST

Resources:

Anti-bribery and Corruption Standard
Sponsorship and Donations policies

Who can I speak to?

Supervisor
Human Resources
Legal Team

GIVING AND RECEIVING GIFTS, HOSPITALITY AND OFFERS OF ENTERTAINMENT

In the context of establishing and/or maintaining good business relationships, employees may occasionally receive or give gifts, entertainment or hospitality, including meals and entertainment, social functions and sporting events.

You must never accept gifts in the form of cash, loans or gift cards/vouchers. You should only give or accept a gift or hospitality if it is reasonable, proportionate and justifiable under the circumstances, and provided in an open and transparent manner. If you are struggling to justify a gift or hospitality, trust your judgement and do not accept it.

The value limits for giving or receiving gifts, hospitality and entertainment are specified in Aurelia's **Anti-bribery and Corruption Standard**. Please check this for the current gift and hospitality limits and ensure you obtain prior clearance from the Chief Financial Officer for any gifts or hospitality valued over the limits specified. The information will be recorded in our **Gifts and Hospitality Register**.

You must never put yourself in a position where you give or receive gifts and hospitality that could improperly influence a decision at work, or during any commercial negotiations such as tendering processes.

If you are in doubt about how to respond to an offer or request for a gift, benefit or entertainment, then you should seek further advice from your supervisor.

WORKING THE AURELIA WAY



- ◆ Complying with Aurelia's limit values for giving and receiving gifts, hospitality and offers of entertainment and seeking approval as required under Aurelia's **Anti-bribery and Corruption Standard**.
- ◆ Never offering gifts, benefits or entertainment which are disproportionate or inappropriate.

BEHAVIOURS THAT WORK AGAINST *THE AURELIA WAY*

- ◆ Accepting gifts, hospitality and offers of entertainment during commercial negotiations, or in circumstances where a sense of obligation will be expected.
- ◆ Accepting gifts, hospitality and offers of entertainment at any time that is valued over the limits specified in the **Anti-bribery and Corruption Standard** without first seeking approval from the Chief Financial Officer.
- ◆ Giving or receiving gifts in the form of cash, loans or cash equivalents (such as gift certificates or vouchers).

Q. A company currently in a tender process with Aurelia has offered me and my two teenage boys tickets to the State of Origin. I will have a role in assessing and signing off on the tender, although I have no role in direct negotiations. Should I accept the tickets?

A. No. You should decline the invitation and explain that it is Company policy not to accept gifts during a tender process.

If the same offer was given outside a tender process, it may still be an issue, as the tickets for you and your children are likely to exceed the Company gift and hospitality limits. You will need to discuss the proposed gift with Chief Financial Officer before accepting the tickets. It would also be disclosed in Aurelia's **Gifts and Hospitality Register** should it be approved.

Q. I have worked hard with a particular contractor on a multi-million-dollar project over the last 18 months which has been successfully completed. The contractor and Aurelia workforce have worked extremely well together. My whole team has been invited to a celebratory dinner at a local restaurant with the contractor's team, at their cost. Should I accept the invitation?

A. The event is appropriate to attend. It celebrates the success of the project and fosters the working relationship between the contractor and Aurelia workforce. The situation could be different if the invitation was extended when the renewal of the contractor's services is being considered.

i GIFTS AND ENTERTAINMENT

Resources:

Anti-bribery and Corruption Standard
Site Sponsorship and Donations policies

Who can I speak to?

Supervisor
Human Resources
Legal Team

BRIBERY AND CORRUPTION

At Aurelia, we are committed to conducting our business ethically and in accordance with *our Values* and *The Aurelia Way*. Aurelia takes a zero-tolerance approach to bribery and corruption which is set out in our **Anti-bribery and Corruption Standard**.

You must not offer, promise, give, request or accept any advantage, whether directly or indirectly, with the intention of influencing, obtaining, retaining or directing of business or a business advantage that is not legitimately due.

Bribery exists where there is an intention to influence a public official or person in the private sector in the performance of their duties, to obtain business or a business advantage that is not legitimately due. This includes the provision of a benefit through an agent or third party (known as an intermediary).

Bribery is the offering, providing, authorising, requesting, accepting or receiving of a financial or other advantage to encourage improper performance or to misuse a person's position. A bribe can be anything of value and does not necessarily involve money.

Bribes can take the form of money, gifts, loans, hospitality, services, discounts, the award of a contract, employing a public official's relative, political or charitable donations and includes any other form of advantage, reward or benefit.

Corruption is the abuse of an entrusted power for private gain. This includes not only financial gain but also non-financial advantages. Examples of corruption are bribes, fraud and facilitation payments.

The Chief Financial Officer must be informed prior to another party being retained to represent Aurelia or conduct work on Aurelia's behalf as an agent or to arrange introductions to potential sponsors or key government decision-makers.

In exchange for payment, a public official may offer to enable or speed up a process that is their duty to perform. Such payments are termed facilitation payments and should not be made. All dealings with public officials must be transparent. If you are asked to make a payment on behalf of Aurelia to a public official, first determine what the payment is for, and whether the amount requested is proportionate to the service being provided. There are occasions where payments are acceptable in situations where there is a publicly available schedule of rates. For example, to attend a meeting the Company has requested to resolve a matter.

If you are offered a bribe or asked to give a bribe, this must be reported to the Chief Financial Officer.

If you are unsure about whether a particular act constitutes bribery, you should report it to your supervisor who will liaise with the Chief Financial Officer to ascertain how to address the issue.

You are also encouraged to inform the Chief Financial Officer of any concerns you have regarding an actual or suspected breach of the Company's **Anti-bribery and Corruption Standard**.

This type of misconduct is treated very seriously could result in the termination of the employment or contract with Aurelia for the offender, and may be reported to the appropriate regulatory and/or law enforcement agencies.

WORKING THE AURELIA WAY

- ◆ Reading and understanding Aurelia's **Anti-bribery and Corruption Standard**
- ◆ Seeking your supervisor's approval before becoming involved in a business activity on Aurelia's behalf

BEHAVIOURS THAT WORK AGAINST THE AURELIA WAY

- ◆ Giving or receiving gifts or hospitality that are excessive, inappropriate or that create a sense of obligation

- Q.** A consultant has been engaged to assist with complex environmental approvals for a new project I'm working on. My supervisor selected the consultant because they have successfully worked together on several other projects. I've received several invoices for the consultant's fees which included expensive line items for miscellaneous fees. I asked the consultant to resubmit the invoices with details about the line items and the same invoices were submitted with 'line-item processing fees'. I raised my concerns with my supervisor but was told that the invoices were acceptable. I also discussed it with my manager-once removed-who told me just to pay the invoice so there were no delays to the consultant's work. This doesn't feel right to me. What should I do?
- A.** Unexplained invoices could be perceived as improper payments being made and could result in a breach of Aurelia's **Anti-bribery and Corruption Standard**. Speak to the Legal Team or raise your concern through the Whistleblower Service, **Stipline**.

i BRIBERY AND CORRUPTION

Resources:

Anti-bribery and Corruption Standard
Sponsorship and Donations policies
Whistleblower Standard

Who can I speak to?

Supervisor
Human Resources
Legal Team
Chief Financial Officer
Stipline

OUR EXPECTATION FOR BUSINESS PARTNERS AND SUPPLIERS

We work with business partners and suppliers who share our commitment to safety, human rights, working ethically and lawfully, and that behave in accordance with *The Aurelia Way*. We also prioritise responsible local procurement of goods and services that contributes to economic and social development in the communities where we operate.

Our business partners and suppliers play an important role in our ability to be successful and therefore choose who we work with carefully. They are treated respectfully, fairly and with honesty.

When entering into partnering relationships with contractors in our business, or in joint ventures where we are not the operator, we seek to influence our partners to adopt policies and standards that are consistent with Aurelia's business expectations.

You are expected to carry out due diligence on potential and existing business partners and suppliers that report to you and confirm they conduct their business lawfully, and verify they operate consistently with *The Aurelia Way* and applicable Company standards. Aurelia's procurement and engagement processes are to be followed to ensure transparent, careful and fair consideration. The terms of contracts must be clear and transparent, so that each party fully understands what is required of them.

It is never acceptable for any third party to act on behalf of Aurelia in a way that breaches the law, *The Aurelia Way* or Company standards. If you know an existing or potential business partner or supplier is conducting business in a manner inconsistent with these expectations, bring this to the attention of your supervisor immediately.

WORKING THE AURELIA WAY



- ◆ Ensuring business partners and suppliers have standards and values similar to Aurelia's and consistently behave accordingly.
- ◆ Working fairly, ethically and respectfully with business partners and suppliers and ensuring accountability and integrity is the foundation for business relationships.
- ◆ Complying with Company procurement and engagement processes.
- ◆ Reporting unethical behaviour of business partners and suppliers and Aurelia employees interacting with them.

BEHAVIOURS THAT WORK AGAINST THE AURELIA WAY



- ◆ Deliberately seeking to bypass Aurelia's procurement and engagement processes.
- ◆ Providing any potential business partner or supplier with an unfair or improper advantage.
- ◆ Accepting anything from a business partner or supplier during commercial negotiations, or that exceeds Company limits without seeking clearance from the Chief Financial Officer.

- Q.** I'm a procurement officer and am aware that a project manager awarded a contract of significant value to an interstate contractor without involving the Procurement Team. When approached, the project manager dismissed my concerns stating he had used the company before and had confidence in them. I'm concerned this is a breach of our procurement processes. What should I do?
- A.** You should raise the issue with your supervisor. The Company requires a competitive tendering process be undertaken, and all procurement decisions be transparent and based on the best value offered, including price, quality, performance history, alignment with Aurelia's values, and whether the works can be undertaken from local suppliers under a competitive bid.

i BUSINESS PARTNERS AND SUPPLIERS

Resources:

Delegated Authorities Manual
 Anti-bribery and Corruption
 Standard
 Procurement Standard

Who can I speak to?

Supervisor
 Commercial Team
 Legal Team
 Chief Financial Officer

USE OF COMPANY RESOURCES

Aurelia property and assets are provided to enable you to fulfil your role. You are responsible for their appropriate use and safeguarding any Company property you use. You are only to use Aurelia property and assets for conducting Aurelia business and not for personal benefit.

Company property includes facilities, vehicles, equipment, including computers and mobile phones, tools and machinery, information technology systems, information, and money. Anything you develop in the course of your tenure with the Company will remain the intellectual property of Aurelia.

We also respect the property and intellectual property of our suppliers, customers and competitors and only use their intellectual property when authorised to do so.

While in your care, Aurelia property and assets should be diligently cared for with appropriate protections in place to prevent misuse, theft, loss, intentional damage or unauthorised access. Stealing and misappropriation of Aurelia property will not be tolerated and will be dealt with under the

Performance Management and Discipline Procedure.

Occasionally, personal use of IT assets, such as computers and mobile phones, is permitted within reason, only if it does not adversely affect job performance and Aurelia's interests, including incurring undue costs and absorbing an unreasonable amount of time while at work. Repeated private use at unacceptable levels will be dealt with in accordance with our

Performance Management and Discipline Procedure.

Your emails at work are not private and Company IT systems are monitored including data, voice, email, telephone logs, internet usage and network traffic to determine proper use. Aurelia's **IT Usage Standard** provides clear guidance on the acceptable use of Company IT systems, including hardware, software and use of Company IT systems. You must always use the IT systems responsibly and in a respectful manner. Knowingly disabling or bypassing any IT system identified as a security or monitoring tool is strictly prohibited.

You must never use Company IT systems under the following circumstances:

- ◆ to harass, bully or vilify another person
- ◆ to send, receive, download or otherwise deal with material that is pornographic, obscene, offensive, illegal (including in the place to which you transmitted), discriminatory, defamatory, threatening or abusive, or which incites or promotes violence or hatred of a group or an individual or is otherwise inappropriate
- ◆ in a manner that infringes the copyright or other intellectual property rights of another person
- ◆ with malicious intent, including viruses
- ◆ attempting to violate any law
- ◆ using unauthorised software that may breach copyright and/or harbour viruses.

The excessive use of social media during work hours that may impact job performance, or on Aurelia IT systems and company or personal phones is strongly discouraged, unless expressly authorised to do so as a component of your role. Examples include:

- ◆ discussion or disclosure of Company information not on the public record
- ◆ uploading photographs taken off Aurelia sites without permission
- ◆ disparaging remarks or privacy violations regarding work colleagues
- ◆ commenting on the details of events or incidents which may have occurred within the Company prior to due process and formal notification being carried out.

In the event of an emergency or serious injury, employees should never circumvent formal notification protocols or communicate to other parties via mobile phone, email or social media.

Cybersecurity is a critical component of Aurelia's operations and we take the security of our organisation very seriously. We partner with a third-party external provider to deliver cybersecurity training and education for all employees and contractors, and provide a 24/7 managed detection and response service.

Recognising the end user is the primary line of defence against cyber threats, mandatory online training ensures everyone who uses our IT infrastructure is well-aware of, and can appropriately respond to, cybersecurity risks. This training imparts knowledge and skills necessary to identify and mitigate potential threats, thereby enhancing our overall cyber security posture.

These comprehensive measures underscore our commitment to maintaining a secure and reliable network environment that leverages state-of-the-art technology and empowers our workforce to safeguard against cyber threats.

WORKING THE AURELIA WAY

- ◆ Treating Aurelia property and assets given to you during your tenure with the Company with the same level of respect you would treat your own property.
- ◆ Being factual, professional and respectful in email and other electronic communications.
- ◆ Treating the use of Company IT systems for personal use as a privilege and not a right.

BEHAVIOURS THAT WORK AGAINST THE AURELIA WAY

- ◆ Using property, assets and Company resources unduly or for personal gain.
- ◆ Ignoring security threats to assets.
- ◆ Sending, receiving, downloading or otherwise dealing with material that is pornographic, obscene, offensive, illegal (including in the place to which you transmitted), discriminatory, defamatory, threatening or abusive, or which incites or promotes violence or hatred of a group or an individual or is otherwise inappropriate.
- ◆ Using or downloading unauthorised software on Company computers.

- Q.** I have an Aurelia-provided laptop and am required to travel to Aurelia's operations regularly as part of my role. I would like to keep some family photos, music and podcasts on my computer. I also use my computer to do my internet banking, pay my bills and to keep in touch with family and friends while I'm away. Is this permitted?
- A.** Yes, incidental personal use of your computer is permitted provided it is reasonable. You should be aware of the guidelines noted above.
- Q.** I emailed a government department using my Aurelia email address and may have been a bit frustrated and used aggressive and offensive language to get my point across. This department has made a complaint and now I'm facing disciplinary action from Aurelia – how is this fair?
- A.** In this case, the Company is pursuing disciplinary action because of abusive and vulgar language that was included in the communication, and which was sent from your work email account to a government department. The correspondence included the Company's logo, contact details and your position title within the Company. At no time does the Company tolerate abusive correspondence s between two parties, or to another external party. In this instance, despite the matter being of a personal nature, the issue became a work-related matter because of the use of the Company's electronic stationery and systems.
- Q.** I'm a new employee to site and yesterday was my first time underground. I'd like to upload some photographs I took underground with several work colleagues to my personal social media account to show my family and friends. Is this ok?
- A.** This is an area that requires sound judgement. Firstly, you are required to get permission from the Mine Manager before considering taking pictures underground. The images will also need to be reviewed before being used on any social media platform. You also need to ensure the people in pictures are comfortable with you posting their photo online. Do not post photos that show people engaging in inappropriate behaviour or that may be viewed offensive to others, photos of people behaving in some way that may be viewed as a breach of safety, photos that intentionally or unintentionally portray the Company in a bad light without the Company having an opportunity to address the matter or put the public record straight. Ask yourself the question "would I be embarrassed, or would I embarrass others or Aurelia if my photos appeared outside my close circle of friends on broader media platforms"?

i PROPERTY AND INFORMATION

Resources:

Employment Contract
IT Usage Standard

Who can I speak to?

Supervisor
General Manager
Human Resources
Corporate Affairs

COMPANY INFORMATION AND CONFIDENTIALITY

Data and information created and used by you during your tenure with Aurelia is the property of the Company and may only be used for business purposes.

Information provided to you by Aurelia or produced by you for Aurelia must be stored properly and remain confidential at all times. It should not be readily visible to, or accessible by, unauthorised persons.

Confidential information includes propriety information or material belonging to or in possession of any of the Aurelia Group companies that is not in the public domain. Confidential information may be visual, oral or in writing. It includes:

- ◆ financial information about the Company or its products
- ◆ business plans, budgets, processes and systems
- ◆ maps, plans, or designs
- ◆ training packages and materials
- ◆ marketing strategies
- ◆ customer, supplier, shareholder or employee information or terms of agreement
- ◆ know how, trade secrets, copyright, patents, innovations or improvements, or other proprietary property.

Regardless of its form, you are obliged to maintain the confidentiality of that information and to not use it for any purpose other than for business-related activities.

Improper disclosure or misuse of confidential information about Aurelia can have a material impact on the Company. Always exercise care when engaging in conversations about the Company with people who do not work for Aurelia, or with people internally who do not need to know the information (ie. not a part of a confidential working group).

Confidential information belonging to customers, suppliers, employees, contractors or other third parties must also be respected in the same way.

Aurelia information should never be used in a manner that may cause or be intended to cause injury or loss to Aurelia or a person associated with Aurelia. You are obliged to respect an individual's rights to privacy and always uphold these rights.

Aurelia information should only be disclosed by you:

- ◆ when it is authorised by the Company in writing
- ◆ when you have confirmed that it is publicly available information
- ◆ to fulfil the function of your role
- ◆ pursuant to an order of a Court or required by law.

You must not remove confidential information from any of Aurelia's work sites without written consent from the Company.

WORKING THE AURELIA WAY

- ◆ Keeping information secure where it is commercially sensitive.
- ◆ Reporting confidential information received in error and returning it to the rightful owner.
- ◆ Obtaining permission prior to externally disclosing commercial or sensitive information that may be considered private or confidential.

BEHAVIOURS THAT WORK AGAINST THE AURELIA WAY

- ◆ Discussing confidential information in a way that it can be overheard in public.
- ◆ Leaving sensitive and confidential information unsecured.
- ◆ Exchanging confidential information without Company authorisation, without entering into a confidentiality agreement, or for personal gain.

Q. When I leave Aurelia can I take my work with me?

A. Generally, any work you create that relates to the business or operations of Aurelia is owned by Aurelia and cannot be used outside the Company without written permission. The work you create when working for Aurelia is also often confidential and so should not be used outside of the Company. You also cannot remove or delete any Company information prior to leaving the Company. You should discuss the matter fully with your supervisor before you leave.

**PROPERTY AND INFORMATION****Resources:**

The Aurelia Way
Employment Contracts

Who can I speak to?

Supervisor
Human Resources
Legal Team

WORKING IN ACCORDANCE WITH THE LAW

Aurelia Directors, employees, contractors and business partners are required to comply with the laws in the state and country they are working. If you are in any doubt about the legality of an activity you are involved in for Aurelia, you should immediately raise your concern with your supervisor or the Legal Team.

If you are concerned a law may conflict with *The Aurelia Way*, or Aurelia's policies and standards, please also consult with the Legal Team.

WORKING THE AURELIA WAY

- ◆ Understanding and complying with the laws of the country or jurisdictions where you are working.
- ◆ Engaging specialist disciplines within the business to ensure all legal requirements, consent and license conditions are incorporated into a project's design, execution and schedule.
- ◆ Reporting all breaches of the law, our consent and licence conditions to your supervisor.

BEHAVIOURS THAT WORK AGAINST THE AURELIA WAY

- ◆ Knowingly breaching a law or consent of license condition.

- Q.** I recently discovered that part of our site has been cleared and is being used as a laydown area and this is not in accordance with historical government approvals. I was told this practice has been in place for many years and there's never been any issues or complaints raised. I don't know if I should say anything. Should I just let it go?
- A.** No. You should immediately notify your supervisor, the General Manager or the Environment Team. If possible, you should also stop using the area and/or stop the activity. The Legal Team should also be notified to assist in preparing necessary notifications to the relevant government department/s.

SHARE TRADING AND INSIDER TRADING

If you wish to buy or sell Aurelia shares, you must consult Aurelia's **Securities Trading Policy** prior to doing so.

The Policy outlines the meaning and legal consequences of 'insider trading'. Insider trading is strictly prohibited by the law and is punishable by a large fine, imprisonment, or both.

You must not buy, sell, or enter into an agreement to buy or sell Aurelia shares if you are in possession of any 'price sensitive' information about the Company that is not available to the market. It may also be considered insider trading if you advise a member of your family, a friend, a business partner or structure such as a family trust, and/or an investment advisor to trade based on insider information. Irrespective of whether this information is used for gain, disclosure to any other person may place you in breach of your confidentiality obligations to the Company.

In addition, you are not permitted to discuss price sensitive information with any other person who may be likely to act on the information by trading Aurelia shares.

Examples of potentially price sensitive information include exploration results, ore reserve and resource information; financial performance or results; a proposed business acquisition or divestment, or the entry or termination of a material contract.

Directors, senior executives and certain employees and contractors who can access confidential and price sensitive information about Aurelia are termed 'Restricted Persons' under the **Securities Trading Policy**. These people have additional protocols governing their dealing in Aurelia shares including needing prior approval to trade and being subject to open and closed trading periods. The Company Secretary maintains the Restricted Persons list and the policy extends to their spouses, dependants and family

companies or trusts. You will be advised by the Company if you fall into this category. Prior to trading, 'Restricted Persons' must complete and lodge a **Securities Trading Clearance Request Form**, obtain written approval prior to trading, and comply with any conditions in the approval.

If you are unsure if you are a Restricted Person, or if you have any questions in relation to the Policy, contact the Company Secretary prior to trading Company shares.

You are not permitted to engage in short term (less than three months) trading or selling of the Company's shares at any time as it creates a perception you are doing this based on insider knowledge and is driving the wrong behaviours.

WORKING THE AURELIA WAY

- ◆ Reading and understanding Aurelia's **Securities Trading Policy** before buying or selling Aurelia shares.
- ◆ Obtaining prior written approval before dealing in Aurelia shares if you are a Restricted Person.
- ◆ Keeping information that is commercially sensitive, secure and confidential at all times.

BEHAVIOURS THAT WORK AGAINST THE AURELIA WAY

- ◆ Communicating or disclosing insider information to anyone.
- ◆ Dealing in Aurelia shares or another Company's shares Aurelia is associated with, or encouraging others to do so, if you have insider information or know something which is market sensitive in relation to Aurelia or its association with any other company.
- ◆ Engaging in short term (less than three month) trading or selling of the Company's shares at any time.

Q. I was previously advised I was on the Company's 'Restricted Persons List' during a special project I was involved in. I'm now in a new role so is it safe to assume I'm no longer a Restricted Person and I can start buying and/or selling Aurelia shares?

A. No. Check with the Company Secretary who will confirm where or not you are on the Restricted Persons List. If you are on the Restricted Persons List, you must seek clearance prior to buying or selling shares.

If you are not on the Restricted Persons List, you will not need clearance to buy and sell shares however general restrictions on insider trading and short-term trading still apply.

- Q.** A senior geologist working on one of our exploration sites said he had just received some great results. I would like to buy some Aurelia shares because I think the share price will rise once the results are released to the market. Can I do this?
- A.** No. While Aurelia encourages its employees to purchase shares in the Company, any purchase must be conducted in accordance with the **Securities Trading Policy**. You should never buy or sell Aurelia shares if you are in possession of potentially price sensitive information which has not been disclosed to the market.
- Q.** I inadvertently overheard part of a telephone conversation which seemed to indicate that my supervisor has been leaking Aurelia information to family members and getting them to buy shares on their behalf. What should I do?
- A.** Report this to the Company Secretary.

i SHARES AND SECURITIES TRADING

Resources:

Securities Trading Policy
Securities Trading Clearance
Request Form

Who can I speak to?

Supervisor
Legal Team
Company Secretary

ACTING ON BEHALF OF THE COMPANY

You are required to conduct your work within Aurelia's **Delegated Authorities Manual (DAM)**.

The **DAM** details the approved authorities and accountabilities to approve expenditures, or enter into financial commitments and legal and/or regulatory undertakings on behalf of Aurelia. These delegations have been approved by the Board and are aimed at empowering employees to work efficiently and effectively within the amount of authority they require to make decisions impacting their roles.

The **DAM** applies to all Aurelia employees who have accountabilities within their role to make financial commitments. If this applies to you, the **DAM**

outlines the levels of authority and any limitations of your role. Guidance is also provided on matters that should be referred to higher authority levels.

Adhering to these delegations is mandatory for all Aurelia employees and a key component of Aurelia's Corporate Governance Framework.

WORKING THE AURELIA WAY

- ◆ Reading and understanding the *Delegated Authorities Manual*.
- ◆ Approving transactions or making commitments in accordance with your authority level.
- ◆ Only approving transactions when you are satisfied all relevant policies and procedures have been complied with.
- ◆ Only approving transactions and/or commitments after they have been properly reviewed and interrogated.
- ◆ Charging costs to a cost code or reporting number for which you have accountability.

BEHAVIOURS THAT WORK AGAINST THE AURELIA WAY

- ◆ Taking actions on behalf of Aurelia that are outside your level of authority.
- ◆ Charging costs to a cost code or reporting number which you do not have accountability for without discussing it with the person/s accountable.
- ◆ Approving a transaction or making a commitment on behalf of the Company knowing there is an error or an issue which has not been addressed or resolved.
- ◆ Making payments progressively where the aggregate is greater than your authority to circumvent the **DAM** requirements.

- Q.** I am responsible for approving the expenses for my team. I have eight direct reports and sometimes I don't have time to check the detail of all receipts, however my team members have always been trustworthy. Do I need to review the detail of every receipt?
- A.** Yes. As a leader within the business, you are expected to comply with all Company procedures relevant to your role and model the behaviours expected of our leaders. Whenever you approve anything in our financial systems, including expense reports and invoices, you must verify the underlying transaction is related to the business and appropriate. This does not undermine the trust you have for your team. It fulfils Aurelia's requirement that receipts are provided for all the Company's transactions and that expenses incurred are work-related.
- Q.** My team and I have been scoping a major improvement program we know will add significant business value. It's also one of our KPIs towards our short-term incentive for this year. Recently, my General Manager did not approve the purchase order related to the program on the basis the proposal exceeded the budget.

I have received notifications through our financial system to approve two smaller purchase orders raised for this program by my superintendent. These amounts fall within my authority limits, and would enable my team to collectively achieve our KPI. Have I done something wrong by approving this work?

- A.** Aurelia's **DAM** states related expenditure is not to be divided or separated into smaller components for the purposes of allowing a lower limit of authority to apply. Authority limits apply to the total value of the project or transaction and individual/partial instalments are not permitted. It is important to note that the inclusion of an item in an approved budget does not of itself authorise the purchase of that item or service. If your General Manager is unable to commit to this expenditure, you should discuss with them how your KPI can be achieved.

i DELEGATED AUTHORITIES

Resources:

Delegated Authorities Manual

Who can I speak to?

Supervisor

Chief Financial Officer

HUMAN RIGHTS

Aurelia supports and respects human rights in its operations and works to ensure we can identify, assess and reduce the risk of modern slavery in our operations and supply chains. In doing this, we recognise that human rights apply to every person across the globe regardless of their background. Human rights are basic political, civil, economic, labour, social and cultural rights and freedoms to which all people are entitled, without discrimination.¹

We will work to ensure that adverse human rights practices are not taking place in our business and that high risk supply chains (including overseas manufacturing and fabrication (clothing, personal protective equipment and electronics), transport and logistics and facilities management (cleaning and catering) comply with our obligations.

Aurelia employees are required to understand and uphold human rights, including:

- ◆ contributing to maintaining a safe and healthy workplace
- ◆ complying with *The Aurelia Way*, relevant HR policies and standards including the promotion of diversity, equity and inclusion in our workplaces
- ◆ only employing individuals above the legal minimum employment age as set by laws in countries of operation and adhere to the National Employment Standards²
- ◆ reporting and taking appropriate action if you identify any potential human rights issues through your supervisor who should then report it to the Legal Team.

If you're an employee who manages a contractor, supply relationships or procurement services on our behalf, you are also expected to:

- ◆ participate in all training related to human rights issues (including modern slavery)
- ◆ ensure business partners and suppliers are made aware of our obligations and requirements, and ensure suppliers provide the Company with information requested with respect to them meeting their human rights obligations
- ◆ ensure new contracts include our human rights requirements (including modern slavery)
- ◆ undertake due diligence on our suppliers to assess their alignment with human rights.

Speak to someone in your site's HR, Commercial or Legal Team if you require support with a human rights issue.

¹ As defined by the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights.

² *Fair Work Act 2009* (Cth).

WORKING THE AURELIA WAY

- ◆ Understanding and upholding human rights.
- ◆ Reporting any concern about our operations or business partner to the HR, Commercial or Legal Team.
- ◆ Request information from high-risk business partners and suppliers with respect to meeting their human rights obligations.

BEHAVIOURS THAT WORK AGAINST THE AURELIA WAY

- ◆ Ignoring human rights abuses in business partners and suppliers.
- ◆ Failing to appropriately report potential human rights issues within your knowledge.

Q. The Company is undertaking a major new project which involves construction of a number of facilities. The Company's project manager notices the majority of the sub-contractor's workforce are foreign and have poor English. Talking to a sub-contractor employee, the manager discovers they are paid less than what would normally be expected in the construction industry and that they are required to pay for everything themselves, including food, accommodation and even PPE. The project manager feels uneasy about this and worries that it may not be legal. What should the project manager do?

A. This is potentially against the law and against Aurelia's Values and commitments to human rights. You should raise this with your manager and/or the Legal Team. They can then address it with the contractor and, if not satisfied, they will be required by the law to raise it with the appropriate government department.

HUMAN RIGHTS

Resources:

Modern Slavery Statements

Who can I speak to?

Human Resources
Commercial Manager
Legal Team

5 COMMUNICATING EXTERNALLY



COMMUNICATIONS AND MARKET DISCLOSURES

The Company's **Shareholder Communications Standard** outlines the Aurelia Board's commitment to providing shareholders and the market with full and timely information that complies with our disclosure obligations contained in the Australian Stock Exchanges (ASX) Listing Rules and *Corporations Act 2001* (Cth).

Price or value-sensitive information must be made available in the first instance through the ASX. This is any information concerning Aurelia or our operations which may have a material effect on the price or value of shares, and is information that would (or would be likely to) influence investors in deciding whether to buy, hold or sell Aurelia shares.

Examples of such information includes exploration results; acquisition and divestment discussions; financial forecasts and results; litigation threats; departure of key members of staff and changes in the Company's operating assets (destruction, failure, natural disaster, etc.).

During your tenure with Aurelia, you must preserve the confidentiality of any price or value-sensitive information concerning the Company. Any price sensitive information requiring disclosure will be undertaken by the Managing Director and Chief Executive Officer, or their delegate, who will ensure it is disclosed in accordance with Aurelia's legal obligations and our **Continuous Disclosure Policy**.

You should make the Company Secretary aware immediately of any potentially material price or value-sensitive information or proposal.

You should also notify the Company Secretary if you become aware that confidential information has ceased to become confidential but not through disclosure by the Company on the ASX (eg. if it was reported or referred to in the media, appears on any legitimate news service, or is discussed on social media platforms) so we can rectify the situation and comply with its continuous disclosure obligations.

If you are producing any communication material, such as a presentation, fact sheet, or paper for any public audience, it must be approved by the Group Manager Commercial and Investor Relations, Chief Financial Officer, or Managing Director and Chief Executive Officer.

If you are unsure if a matter should be disclosed, raise it with the Group Manager Commercial and Investor Relations or the Company Secretary in the first instance.

Breaches of our **Continuous Disclosure Policy** may result in serious consequences for Aurelia. Any employee or adviser who is involved in a breach could also face criminal penalties and civil liability.

COMMUNICATION WITH SHAREHOLDERS, THE MEDIA AND OTHER EXTERNAL AGENCIES

The only persons authorised to make public statements on behalf of the Company are the Chair of the Board, the Managing Director and Chief Executive Officer, or a person expressly authorised to act in this capacity by the Chair and/or Managing Director and Chief Executive Officer.

If you are personally interacting with shareholders (or potential shareholders), investment analysts, stockbrokers or any other member of the investment community, you should always exercise good judgement and ensure you do not disclose any information about Aurelia that has not been made publicly available. This includes social media platforms.

If you receive an unsolicited request for comment from an investor, analyst, the media or another external agency in relation to a matter relating to the Company, advise that you are not authorised to speak on behalf of the Company. Politely ask for their contact details, some basic information about the nature of their enquiry, then promptly provide this information to the Group Manager Commercial and Investor Relations.

Any known or suspected instances of non-compliance should be reported to the Company Secretary or Legal Team for full investigation. Employees should be aware that breaches of this policy may result in summary dismissal and may also attract civil penalties under the *Corporations Act 2001* (Cth).

Company Directors, employees and contractors using their personal social media accounts to comment on activities in connection with Aurelia (ie. on the Company's LinkedIn and/or Facebook pages), must remember that in this capacity, they are an ambassador for the Company. Please exercise respect and protect Aurelia's reputation by communicating in line with our Values.

WORKING THE AURELIA WAY



- ◆ Reading and understanding Aurelia's **Continuous Disclosure Policy**.
- ◆ Keeping non-public Company information confidential.
- ◆ Attending training programs to ensure you are aware of the Company's continuous disclosure obligations.

BEHAVIOURS THAT WORK AGAINST *THE AURELIA WAY*

- ◆ Making public statements about Aurelia business matters when not authorised to do so.
- ◆ Discussing confidential information in a way that it can be overheard in public.
- ◆ Disrespectfully commenting about Aurelia business matters in online platforms (eg. LinkedIn, Facebook and other chat forums).

Q. In an online stock market chat forum, HotCopper, I saw a comment about recent Aurelia drilling results. I know the comments are misleading and not in the Company's best interest and I'd like to respond. Can I use a recent Aurelia ASX Announcement as a guide to respond and correct this information?

A. No. If you are concerned the information is not factual or could be misleading, then report this to the Group Manager Commercial and Investor Relations who will bring it to the attention of the Company Secretary. The Company does not generally respond to market speculation or rumour unless required to do so by law. Whether a comment is to be made in response to any market speculation or a rumour, is a decision for the Aurelia Board in consultation with the Managing Director and Chief Executive Officer.

Q. I have been asked to make a presentation to a group of bankers making a site visit. What should I do?

A. Consult with the Group Manager Commercial and Investor Relations regarding approval to represent the Company. They can also help to draft a presentation that is consistent with publicly available information. You should also enquire if an approved presentation (or part thereof) is already available. All presentations intended for an external audience must be reviewed by the Group Manager Commercial and Investor Relations before it is presented to ensure there are no inconsistencies or undisclosed, price-sensitive information in the presentation.

WORKING WITH GOVERNMENT AGENCIES

Aurelia works closely with government officials in the jurisdictions where we operate, and regularly engages with them on the issues that affect our business. We maintain sound professional relationships with governments, their agencies and employees, and always act in a respectful, honest, transparent and ethical manner. We always co-operate with government enquiries and investigations.

All engagement with government agencies should be handled by each operation's authorised representatives. For sensitive matters or matters that are not business as usual, the Corporate Affairs team should be consulted. The authorised representatives onsite will generally be the General Manager, or their nominated delegate, site statutory official or specialist authorised person, such as site environmental or safety representative.

We are required under the law, government regulations and our licenses, to report certain safety and environmental non-compliances and incidents to the appropriate government department. Notifications are done through formal channels via a statutory or defined role within the Company. If you are in doubt about who to speak with about these incidents, see your General Manager or your safety or environment representatives.



During some reportable incidences, you may be required to preserve the scene as per legislative requirements or so authorised site personnel and/or government agencies can conduct a site inspection. If there are any doubts, discuss this with your supervisor or your safety or environment representative before interfering with the scene. There are other matters that may be of a criminal nature where a government agency needs to be formally notified. If in any doubt, discuss this with the Company Secretary.

In accordance with Company guidelines in its **DAM**, Aurelia cannot make any donations to political parties (cash or in-kind). Employees may participate as individuals in political processes provided it is made clear that in doing so, they are not representing the Company.

WORKING THE AURELIA WAY

- ◆ Being truthful, accurate, co-operative and courteous when dealing with government representatives.
- ◆ Reporting incidents to a General Manager without delay to enable timely notification to the respective government agencies.
- ◆ Preserving the scene of reportable incidents so a full inspection can be conducted by relevant site representatives and/or government agencies.
- ◆ Always notifying your supervisor or a potentially reportable incident even if it was not caused by you so it can be escalated to the appropriate people, including the General Manager, safety or representatives.

BEHAVIOURS THAT WORK AGAINST THE AURELIA WAY

- ◆ Attempting to obstruct the lawful collection of information, data, records or testimony by authorised government representatives.
- ◆ Not reporting potential incidents because you think someone else will.
- ◆ Using Aurelia's or your personal funds and resources on Aurelia's behalf to make donations to political parties or support any political activity, candidate or party.
- ◆ Disturbing a scene that has been frozen awaiting authorised representatives and/or government official inspection.

- Q.** There's been a reportable environmental incident on site and a team of government officials on site investigating. During the investigation, I've been approached by the officials and asked to answer questions regarding what happened and provide some Company procedures and inspection records. How should I respond?
- A.** If asked direct questions by government officials, you should always cooperate and answer the questions honestly and factually. If you do not possess the information requested, politely direct the official to your General Manager to find the appropriate person to speak to. It is better to be frank if you don't know the answer, rather than possibly providing incorrect or misleading information. You should also never speculate in your response - only provide factual information. Keep a record of any information you give you a government official and inform the manager/supervisor dealing with the matter. If you are unsure about the request to provide Company information, inform your General Manager and/or the Legal Team.

i COMMUNICATING EXTERNALLY

Resources:

Shareholder Communications Standard
Continuous Disclosure Policy

Who can I speak to?

Supervisor
General Manager
Chief Financial Officer
Company Secretary
Group Manager Commercial and Investor Relations
Legal Team
Corporate Affairs Team





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