

Code of Conduct

KRAFTIGS Australia Pty Ltd · ACN 650 985 121 · ABN 21 650 985 121

Version 1.0 · Adopted June 2026

Policy owner	Chief Executive Officer (Ali Hammoud)
Approved by	Board of Directors
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1. Purpose

KRAFTIGS Australia Pty Ltd (ACN 650 985 121, ABN 21 650 985 121) (KRAFTIGS, we, us) is a private company registered in New South Wales. We explore for and develop gold projects in Australia and overseas, working with experienced local operators and technical partners engaged for each project.

This Code sets out the standards of behaviour we expect from everyone who works for or with us. It is the umbrella document for our other policies, in particular our Anti-Bribery and Corruption Policy, Environmental Policy, Health and Safety Policy and Whistleblower Policy. It does not try to cover every situation. When in doubt, ask before you act.

2. Scope

This Code applies to directors, officers, employees, contractors and consultants of KRAFTIGS, wherever they work (together, **our people**).

We expect the operators, technical partners, suppliers and agents we engage for a project to meet standards equivalent to this Code. We will include this expectation in our contracts with them.

The Code applies in Australia and in the countries where our projects are located. Where local law and this Code differ, we follow whichever sets the higher standard, unless doing so would break the law.

3. Our standards

Act lawfully and honestly. We comply with the laws that apply to us in Australia and overseas. We do not mislead anyone, and we do not help anyone else break the law.

Treat people with respect. We do not tolerate discrimination, bullying, harassment (including sexual harassment) or victimisation. We respond to these behaviours when they occur, and take reasonable steps to prevent them in the first place.

Put safety first. No task is so urgent that it cannot be done safely. Anyone may stop work they believe is unsafe. See our Health and Safety Policy.

Care for the environment and the communities around our projects. We plan our work to limit harm, we respect the rights, culture and heritage of local and Indigenous communities, and we look to hire and train local people first. See our Environmental Policy.

No bribery or corruption. We never offer, pay, request or accept a bribe, directly or through anyone else. See our Anti-Bribery and Corruption Policy.

Avoid conflicts of interest. Our people must tell the Chief Executive Officer about any personal, family or financial interest that could conflict, or appear to conflict, with their duties to KRAFTIGS, and must not take part in decisions affected by that interest unless cleared to do so. Directors must also meet their disclosure duties under the Corporations Act 2001 (Cth). Declared conflicts are recorded in a Conflicts of Interest Register kept by the Chief Executive Officer.

Be accurate with investors and partners. We deal honestly with the investors we work with in Australia, Singapore and the UAE and with our project partners. We do not promise or forecast returns, and we only make statements about a project that are fair and have a reasonable basis. Exploration results and mineral resources are reported under the JORC Code where it applies. Any offer of shares or project interests is made only as permitted by the laws of Australia and of the investor's country.

Know who we deal with. We check investors, buyers, suppliers and partners before we deal with them, so that we do not deal with sanctioned persons or become involved in money laundering or the financing of conflict. We will manage our gold supply chain in line with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas and the LBMA Responsible Gold Guidance.

Respect human rights and fair work. We do not use, and will not knowingly benefit from, forced labour, child labour, debt bondage or human trafficking. We pay people fairly and on time. We are not currently required to report under the Modern Slavery Act 2018 (Cth), but we voluntarily apply its principles when we choose and monitor suppliers and partners.

Protect information. We keep confidential information confidential, including data shared with us by project owners and partners. We handle personal information in line with the Australian Privacy Principles and our Privacy Policy.

Keep accurate records and look after company property. Our accounts, invoices, expense claims and reports must be complete and true. Company funds, equipment, data and samples are used only for company business.

Speak for the company only when authorised. Only the Chief Executive Officer may speak to the media or make public statements on behalf of KRAFTIGS.

4. Responsibilities

- **Directors** approve this Code, set the example from the top, and make sure the company has the resources to apply it.
- **The Chief Executive Officer** owns this Code, answers questions about it, arranges training and keeps records of acknowledgements and declared conflicts.
- **Managers and project leads** explain the Code to their teams and to contractors and partners on each project, and act on concerns raised with them.
- **All our people** read the Code, confirm in writing that they have done so (on joining and every year), follow it, and speak up.

5. Raising concerns

If you see or suspect conduct that breaks this Code, the law or our policies, raise it with your manager or with the Chief Executive Officer. You may also use the channels in our Whistleblower Policy, including anonymously. We will not tolerate anyone being punished or disadvantaged for raising a concern honestly.

6. Breaches

Breaching this Code may lead to disciplinary action, up to and including termination of employment or of a contract. Where a breach may also be a crime, we may report it to the relevant authorities.

7. Review

This policy will be reviewed at least every two years, and earlier if the law changes, if our activities change materially (for example, a project moves from exploration into development), or if a review of an incident shows it needs updating.

Changes must be approved by the Board of Directors. The current version will be made available to everyone it applies to and may be published on our website.

General enquiries about this policy: the Chief Executive Officer, KRAFTIGS Australia Pty Ltd, 24 Iraking Ave, Moorebank NSW 2170, or info@kraftigs.com.au.