

## Code of Conduct

Hastings Technology Metals Ltd (**Hastings** or the **Company**) has implemented this Code of Conduct (**Code**) to ensure our culture and values are clearly defined and to provide clear expectations on how we are expected to behave in the workplace and how we treat others.

### 1. Scope

Our Code of Conduct applies to directors, employees, contractors, or any other person working for or on behalf of the Company (collectively referred to as **Staff**).

### Values

Hastings values are:

**Passion:** We are **loyal** to the project and work passionately to deliver our vision.

**Teamwork:** we are honest, **we care for each other**, and work as one team to achieve our common goal

**Tenacity:** We pursue new opportunities and solutions with **integrity** and persistence.

**Owner's Mindset:** We strive towards **excellence** and take care and responsibility in everything we do.

Hastings is committed to providing and maintaining a work environment that aligns with our values in which:

- Every Staff member is treated with dignity, courtesy, fairly and respectfully
- Equal opportunity is provided to all employees
- All workplaces are inclusive and free from unlawful discrimination and workplace harassment.

In line with Company values, this Code prescribes standards of conduct and behaviour that are:

- Lawful
- Ethical
- Honest
- Accord with good faith

### 2. Standards of Behaviour

Staff are required to maintain the highest levels of professional conduct at all times:

- In their interactions with each other

- With Stakeholders, and
- In representing the Company,

and ensure a standard of behaviour consistent with this Code.

To maintain these levels of professional conduct, the Company expects all Staff to:

- Exercise personal responsibility for their own health and safety and look out for each other
- Act ethically and responsibly in accordance with Hastings values and in the best interests of the Company.
- Act honestly and with high standards of personal integrity.
- Focus on delivering our vision.
- Work collaboratively with each other.
- Demonstrate responsibility for their actions and deal fairly with all parties with whom they interact.
- Comply with all laws and regulations that apply to the Company and its activities.
- Be respectful and show care and responsibility in dealings with all parties.
- Be empowered to perform at their best and be proactive in identifying and managing risks. The Company encourages people to speak up on any concerns and challenge the status quo.

## **2.1 Obligations**

All Staff are expected to be responsible for their actions and act in the best interests of the Company, including:

### **2.2 Act honestly, with integrity, and ethically**

All Staff are expected to act honestly, with integrity, and ethically by:

- Conducting themselves with the highest standard of honesty and integrity, treating people respectfully, and without harassment, bullying or discrimination
- Acting fairly and impartially in all dealings and in a manner that is not fraudulent, dishonest, or corrupt and not encourage or promote such behaviour in others
- Not knowingly participate in any illegal or unethical activity.

### **2.3 Act in the Company's best interests**

All Staff are expected to act in the best interests of Hastings by:

- Protecting Hastings assets and not steal, misappropriate, or misuse them
- Not improperly using their position within the Company, including:
  - taking improper advantage of their position or opportunities arising from their position for potential gain
  - using property or information of the Company or its stakeholders for personal gain or to cause detriment to the Company or its stakeholders or
  - the soliciting or receiving of benefits from third parties for personal advantage or

material gain.

## **2.4 Conflicts of interest**

All staff are expected to avoid situations where personal interests are conflicting with those of Hastings. Staff are also expected to disclose and deal appropriately with any conflicts between their personal interests and their duties as a member of Staff.

Where a member of Staff becomes aware of an actual or potential conflict between the Company and another member of Staff, the Staff member shall immediately notify the Protected Disclosure Officers in accordance with the Whistleblower Policy.

## **2.5 Gifts, entertainment, and benefits**

Each member of Staff must ensure an awareness and understanding of this Company Code of Conduct. This includes, but is not limited to, acting so as not to seek, accept, provide, offer or cause to be provided any bribes, kickbacks, gifts, entertainment, payments, gratuities, or any other benefit (collectively referred to as 'Benefits') where the Benefit is being provided to obtain or retain business, to influence decision making or to otherwise obtain or retain a business advantage that is not legitimately due.

## **3. Non-Compliance**

All Staff are encouraged to speak up if they have concerns if they sense something is 'not right' or if they become aware of other matters which may be inconsistent with the Code. Staff must immediately notify their manager, a more senior manager, or Human Resources if they become aware of any actual or suspected behaviour in breach of this Code. If staff wish to make a report anonymously, Hastings Whistleblower Policy sets out a confidential process for doing so.

Hastings is committed to ensuring a work environment exists in which no-one is subject to adverse treatment or is victimized for reporting genuine concerns or suspected misconduct. Any person who in good faith notifies of an actual or perceived breach of this Code shall not be subject to adverse consequences as a result of taking such action and that all such concerns are properly investigated.

The Hastings Board shall be notified of any material breaches of this Code.

This Code shall be periodically reviewed by the Board to assess whether it is being implemented, maintained, and operating effectively, and make any changes to continually improve its effectiveness.

The Company and its directors are committed to developing, promoting, and maintaining this Code. It is the responsibility of each Staff member to understand and comply with this Code.

This Charter will be reviewed annually by the Committee with any proposed changes to be approved by the Board.

A handwritten signature in black ink, appearing to read 'Charles Lew', with a horizontal line extending to the right.

Charles Lew  
Executive Chairman  
Approved by the Board (11 July 2024)