ASTRON

# CODE OF CONDUCT

**Astron Limited**

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## 1.1 Document control

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# Code of Conduct

## Purpose

Astron Limited (the **Company**) and its wholly owned subsidiaries and controlled entities (together, the **Group**) value people who behave professionally, with integrity and objectivity. This Code of Conduct (**Code**) aims to encourage the appropriate standards of conduct and behaviour of the Group's directors, officers, employees, and contractors (collectively referred to as **Personnel**).

Personnel are expected to act in accordance with this Code and the Company's statement of values set out in Annexure A and to always strive to enhance the reputation and performance of the Group.

The Company has adopted a number of policies which support this Code. These policies, available in the Governance section of the Company's website, provide further guidance and information and should be read in conjunction with the Code.

## General Principles

### Ethics, integrity and reputation

The Company expects that Personnel will:

- Act honestly, in good faith and in the best interests of the Group.
- Use due care and diligence in fulfilling the functions of and exercising the powers attached to their position.
- Manage and use the assets of the Group responsibly and appropriately manage the confidentiality of Group information.
- Not take advantage of their position for personal gain, or the gain of their associates.
- Act with high standards of personal and professional integrity when representing the Group and engaging with stakeholders.
- Support the Company to operate in a responsible and sustainable manner.
- Respect the Company's personnel's rights to privacy and keep personal information in confidence.
- Refrain from acting in any way that would unfairly harm the reputation and career prospects of Company's Personnel.
- Comply with all laws and regulations that apply to the Group and its operations.
- Familiarise themselves with these policies as appropriate to their engagement with the Group and as may be appropriate in particular circumstances.

### Conflict of Interest

Personnel are expected to be independent in their judgements and actions and avoid or fully disclose conflicts of interest.

At all times, Personnel must be able to act in the interests of the Company. Where the interests of associates, the personal interest of a Personnel or a Personnel's close relation may conflict with those of the Company, then the Personnel must immediately disclose such conflict and either eliminate the conflict or abstain from participation in any discussion or decision-making process in relation to the subject matter of the conflict.

### Professional Conduct and Workplace Expectations

#### *Diversity, equal opportunity and anti-discrimination*

The Company is committed to recognising, valuing and rewarding the contribution of Personnel and aims to ensure that Personnel are treated with respect, dignity and fairness with the intention of creating an inclusive environment which promotes positive working relationships.

Personnel are expected to foster an inclusive and collaborative workplace free from bullying, harassment and discrimination.

Further information is available in the Company's Diversity Policy and Equal Employment Opportunity, Discrimination, Bullying, Harassment and Sexual Harassment Policy and Procedures.

### *Workplace Health and Safety*

The Company is committed to maintaining a healthy and safe working environment for Personnel.

Personnel have a responsibility to assist in ensuring health and safety laws and internal policies, procedures, instructions and obligations are complied with.

Misusing alcohol or controlled substances, or possessing or being under the influence of, illegal drugs in the Company's office, at work sites or at work-related events will not be tolerated.

Refer to Astron's Workplace Health and Safety Policy and Alcohol and Other Drug Testing Policy for further information

### *Anti-Bribery and Corruption*

Personnel must not seek, accept, provide, offer or cause to be provided any bribe, entertainment or other benefit where the benefit is being provided to obtain or retain business; influence decision making; or otherwise obtain or retain a business advantage that is not legitimately due. All Personnel are expected to act in accordance with the Company's Anti-Bribery & Corruption Policy.

### *Use of Information and Resources*

Information concerning the activities or proposed activities of the Group, which is not public, and which could materially affect the Company's share price must not be used for any purpose other than valid Company requirements. The Company's Securities Trading Policy contains further details in this regard.

Personnel are responsible for protecting Group property under their control and safeguarding property from loss, theft and unauthorised use.

Personnel are expected to keep and retain accurate records and to value the importance of protecting the Group's confidential information as well as the confidential information of other companies and individuals.

### Stakeholders

The Board recognises that the primary stakeholders in the Company are its shareholders. Other stakeholders in the Company include Personnel, customers, suppliers, communities that are or may be impacted by the Company's activities, and the general community.

The primary objective of the Company is to create shareholder value through capital growth and continued successful development of Group projects.

The Company is committed to conducting its operations in a manner which:

- achieves a balance between economic development, maintenance of the environment and social responsibility;
- maintains good relationships with suppliers and other stakeholders; and
- is honest, lawful, and ethical.

The Company is committed to communicating with shareholders and stakeholders in a timely, accurate and accessible manner.

## Monitoring

With the assistance of the Audit and Risk Committee, senior management is responsible for ensuring that Personnel are aware of, understand and observe the requirements of this Code. The Board will monitor compliance and the effectiveness of training programs through the Audit and Risk Committee periodically seeking feedback from senior management and other Personnel from time to time.

Suggestions for improvements to or amendments of the Code can be made at any time in writing to the Company Secretary.

## Breaches

The Company views breaches of this Code as serious misconduct. Personnel who breach the policies outlined in this Code may be subject to disciplinary action, including in the case of serious breaches, dismissal.

Personnel have a responsibility to report actual or suspected breaches of this Code to direct managers or the Company Secretary, or in their absence, the Chair. Any Personnel who, in good faith, reports a breach or a suspected breach will not be subject to any retaliation or recrimination for making that report.

[Personnel may make anonymous reports, further details of which are set out in the Company's Whistleblower Protection Policy.

The Company Secretary has the responsibility to report the breach to the appropriate member of senior management and to advise the relevant Personnel of the outcome and actions implemented.

The Company Secretary must inform the Audit and Risk Committee of any material breach of this Code.

## Further information

Personnel requiring further information about this Code should contact the Company Secretary.

## Review

The Audit and Risk Committee will review this Code periodically to ensure that it is operating effectively. The Board may amend this Code from time to time by resolution.

# Annexure A: Statement of Values

## We look after our people

Safety comes first, because physical and mental wellbeing are fundamental to a successful workplace. We are committed to building a diverse workforce and an inclusive workplace culture.

## We observe the law, our obligations, voluntary commitments and internal standards

We comply with all laws, regulations and obligations that are applicable, including internal Astron policies and voluntary commitments. We ensure our personal and business interests never interfere with our ability to make sound, objective decisions.

## We value and maintain professionalism in all of our dealings

We behave in a professional manner that fosters trust, confidence and goodwill. We are always respectful and ensure that we do the right thing. We always strive to deliver on our commitments.

## We recognise our responsibilities to our stakeholders

We are committed to engaging in constructive dialogue with our stakeholders to understand and respond to issues that are important to our people, customers, investors, suppliers, government, landowners and the wider community.

ASTRON

**Astron Limited**
ABN: 54 685 756 209
Level 10, 224 Queen Street, Melbourne VIC 3000 Australia