CODE OF CONDUCT

Purpose

We want every person's time at Endura to be a highlight of their career. This requires us all to commit to a high performing, respectful culture. Simply put, it requires us all to live our values of **safety, integrity** and **accountability** and to treat each other as we ourselves would expect to be treated.

Deviations from this will not be tolerated and we expect everyone working for or representing Endura to commit to this Code of Conduct (**Code**).

Definitions

In this Policy:

"**Personnel**" shall mean:

- all directors, senior executives, employees, and officers of the Company;
- contractors (including sub-contractors) occupying permanent or part time fixed term contracts;
- consultants or suppliers of goods or services and their employees; and
- third parties including intermediaries and associates.

Work Ethic

When conducting business and dealing with suppliers, colleagues and other stakeholders, Personnel must:

- act with integrity, professionalism and act like an owner in the use of Company information, funds, equipment and facilities;
- exercise fairness, equity, and respect in dealing with personnel and other stakeholders;
- avoid real or apparent conflict of interests;
- not take advantage of their position, or the property or information of the Company or its customers for personal gain or to cause detriment to the Company or its customers;
- promote the best interests of the Company;
- perform their duties with skill, honesty, care and diligence, using authority in a fair and equitable manner;
- demonstrate behaviours that align to the Company's values of safety, integrity and accountability;
- abide by the policies, standards, procedures, instructions and lawful directions, that relate to their employment and duties;
- comply with applicable laws and regulations; and
- be aware of, and comply with, all Company policies.

Harassment, bullying and discrimination

The Company is committed to providing an environment where our people are treated with respect. Harassment, including sexual harassment, bullying and discrimination of any kind is not acceptable in our workplace and will not be tolerated.

For the purposes of this Policy:

- harassment refers to an unwelcome or inappropriate action, conduct or behaviour that a reasonable person would find unwelcome, humiliating, intimidating or offensive;
- sexual harassment refers to an unwelcome or inappropriate sexual advance or request for sexual favours to the person who is harassed and other unwelcome conduct for a sexual nature in relation to the person who is being harassed;
- bullying refers to a repeated behaviour directed towards an individual or group of individuals that is unreasonable and creates a risk to health, safety and well-being; and
- discrimination refers to making unlawful distinctions between individuals and groups on the basis of any protected attributes.

*Health, Safety, Environment and Community (**HSEC**)*

Safety is a core value for the Company and is a core focus in our daily operation and the way we work. Our priority is the protection of our people and their wellbeing, the environment, our reputation and the local communities in which we operate.

All Personnel must comply with all Company and local HSEC processes, rules and procedures.

The Company operates in close proximity to, and with the co-operation and consent of, its local communities. When interacting with local communities, Personnel must:

- be respectful and courteous towards members of the local community;
- not be abusive, offensive or hostile;
- not cause damage to community-owned or private facilities;
- abide by all laws, rules and regulations of the community and the local jurisdiction; and
- avoid behaviour that could harm the Company's reputation or relationship with its local communities.

Inclusion and diversity

The Company is dedicated to growing an inclusive and diverse workforce, aligned with our values of safety, integrity and accountability. The Company will treat all Personnel fairly and with respect, and provide opportunities for Personnel to contribute to business success and realise their full potential.

Conflict of Interest

Personnel must avoid personal, financial, or other interests which may conflict with their duties and responsibilities to the Company.

Any interest which may constitute a conflict of interest must be promptly disclosed to a direct manager or the Company Secretary.

Accepting any external appointment, such as a board appointment (other than to the board of a non-trading family company), working for another organisation or conducting a business is not permitted without the written permission of the Executive Chair.

Bribery, Corruption & Fraud

Personnel must not offer, promise, give, demand or accept any undue advantage, whether directly or indirectly, to or from, a public official, a political candidate, party or party official, a community leader or other person in a position of public trust or any private sector employee in order to obtain, retain or direct business or to secure any other improper advantage in the conduct of business. Personnel are referred to, and must comply with, the Company's Anti Bribery & Corruption Policy.

Personnel must use company funds, allocate resources, hire personnel and/or award contracts in accordance with the Company's approved delegations of authority matrix and for business related purposes and not for personal gain or interest.

Property & IT Use

The Company's property, funds, equipment, vehicles, facilities and services must be used for authorised purposes only. All Company electronic devices and internet use must be appropriate and within acceptable use guidelines.

Communicating Externally

The Company's relationship with the media and the community are to be conducted by the Executive Chair, or as delegated by the Executive Chair to the Executive or other senior manager. Personnel are not authorised or permitted to speak to the media, or post or comment on social media, for or on behalf of the Company without express approval of the Executive Chair.

Personnel must not disclose any Company confidential information to any third party, either verbally or in written form, without the prior consent of the Executive Chair.

Gifts and Hospitality

The Company prohibits the giving or receiving of gifts, or invitations involving travel, accommodation and entertainment in circumstances which could be considered improper, give rise to undue influence, or would otherwise breach the Company's Anti-Bribery & Corruption Policy.

Code Breaches and Whistleblower Arrangements

Personnel have a duty to comply with this Code, and to report known or suspected breaches of this Code, or other unethical, unlawful, or undesirable conduct or practices to their manager, or by using the mechanism provided under the Company's Whistleblower Policy.

Any Personnel, who in good faith, makes a complaint or disclosure in accordance with the Company's Whistleblower Policy will not be disadvantaged or prejudiced in the making of such a complaint or disclosure. All reports will be treated as confidential.

Personnel found to be in breach of applicable laws, this Code or other Company policies may be subject to disciplinary action, and where warranted, dismissal.

Review

This policy will be subject to regular periodic review which as a minimum will be conducted annually.