



Code of Conduct

1 Purpose of the Code of Conduct

The Company is committed to a high-level of integrity and ethical standards in all business practices. All directors, employees and contractors of the Company must conduct themselves in a manner consistent with current community and Company standards and in compliance with all relevant legislation.

The Code of Conduct outlines how the Company expects its representatives to behave and conduct business in the workplace on a range of issues. It includes legal compliance and guidelines on appropriate ethical standards.

The objective of the Code of Conduct is to:

- provide a benchmark for professional behaviour throughout the Company;
- support the Company's business reputation and corporate image within the community; and
- make Directors and employees aware of the consequences if they breach the policy.

We regularly monitor and test our policies under this Code of Conduct to ensure our commitments remain relevant, effective and consistent with our stakeholders' expectations.

While the Code of Conduct is designed to ensure the Company delivers on its commitment to corporate responsibility and sustainable business practice, it does not create any rights in any employee, client, customer, supplier, competitor, shareholder or any other person or entity.

2 Who the Code of Conduct applies to

All executive and Non-executive directors, employees and contractors of the Company must comply with the Code of Conduct.

A reference to 'employees' in this Code of Conduct includes temporary employees, contractors and Non-executive Directors who must not only comply with applicable laws, rules and regulations; but must also engage in and promote honest and ethical conduct and abide by the policies and procedures that govern the conduct of the Company's business, including this Code.

Responsibility lies with every person covered by the Code of Conduct to conduct themselves in accordance with the Code of Conduct. Your responsibilities include helping to create and maintain a culture of high ethical standards and commitment to compliance, and, in the case of directors and



officers, maintaining a work environment that encourages employees to raise concerns to the attention of management and promptly addressing employee compliance concerns relating to any potential breach of the Code of Conduct, the Anti-Bribery and Corruption Policy or any other Company policy.

For more information regarding raising concerns, please refer to the Company's Whistleblower Policy.

The Code of Conduct should be read in conjunction with the Company's other policies, including the Continuous Disclosure Policy, Securities Dealing Policy, Diversity Policy, Whistleblower Policy and Anti-Bribery & Corruption Policy. Copies of all Company policies are available on the Company's website.

The Company continually assesses and upgrades its policies and procedures to ensure compliance with corporate governance requirements. You will be notified of any material changes to the policies and procedures.

3 Compliance with laws and regulations

You should be aware of, and comply with, your duties and obligations under all laws and regulations relating to your work.

We encourage you to:

- actively understand the laws which affect or relate to the Company's operations;
- attend seminars presented by the Company Secretary or other external service providers to maintain your knowledge of the laws and regulations, as well as to increase your awareness of relevant legal and industry developments; and
- interpret the law in a way which reinforces the Company's reputation for integrity.

If you have a question as to whether particular laws apply or how they may be interpreted, please contact the Company Secretary.

4 Fair trading and dealing

The Company aims to maintain a high standard of ethical behaviour in conducting business and to behave with integrity in all dealings with customers, shareholders, government, employees, suppliers and the community.

When dealing with others, you must:

- act in accordance with the Company's stated values;
- perform your duties in a professional manner;
- act with the utmost integrity and objectivity; and

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- strive at all times to enhance the Company's reputation and performance.

You are encouraged to familiarise yourself with the legal requirements applying to fair trading and dealing, and to undertake training or attend seminars to develop and maintain your knowledge so that you can act in accordance with those requirements.

If you have a question or wish to report a breach of fair dealing requirements, please contact the Company Secretary.

5 Conflicts of interest

You are responsible for notifying the Company of any conflicts of interest (actual or potential). If you are concerned that you may have a conflict of interest you should disclose that interest and discuss the matter with the Company Secretary.

(a) What is a conflict of interest?

A conflict of interest exists where loyalties are divided.

You may have a conflict of interest if, in the course of your employment or engagement with the Company:

- any of your decisions lead to an improper gain or benefit to you or your associate; or
- your personal interests, the interests of an associate, or relative, or obligation to some other person or entity, conflict with your obligation to the Company.

The following are some common examples that illustrate actual or apparent conflicts of interest that you must avoid. The examples are intended to be a guide only.

(b) Improper personal benefits

Conflicts of interest can arise when you or a member of your family receive improper personal benefits as a result of your position. You and your relatives should not give unreasonable gifts to, or receive unreasonable gifts from, the Company's customers or suppliers or others with whom the Company interacts.

An unreasonable gift is one in excess of US\$100 dollars in value.

We encourage you not to accept a gift (of any kind) in circumstances where your business judgment might appear to have been compromised.

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If you have dealings with companies based in countries where gift giving has important cultural significance and plays an important role in business relationships, you should be aware and respectful of such cultural practices but remain mindful of the Company's overriding policy in this regard.

All gifts must be declared to the Company Secretary to be recorded in a gifts register to be maintained by the Company Secretary.

If you are in doubt as to the appropriateness of a gift (including whether that gift may be considered "unreasonable") please check with the Company Secretary. You should also refer to:

- the Anti-Bribery & Corruption Policy; and
- the Donations and Community Investments Policy.

(c) Financial interests in other businesses

You should avoid having a significant ownership interest or personal financial interest in any other enterprise if that interest compromises or appears to compromise your judgement in discharging your duties for the Company.

You must disclose all personal financial interests that you or members of your family have in organisations which have established, or are attempting to establish, a business relationship with the Company or which compete with the Company.

Personal financial interests include, among other things, interests resulting from the following relationships:

- officer, director, employee or independent contractor;
- ownership of shares or other equity interest;
- debtor or creditor (other than in respect of personal financing arrangements with a recognised financial institution, such as mortgages); or
- lessee or lessor.

Ownership of less than five percent of the common or ordinary shares in an entity is not normally considered a conflict.

If you have any doubt about personal financial interests, consult with the Company Secretary.

(d) Corporate opportunities

You must not take advantage of property, information, or other opportunities arising from your position in the Company.



For example, if you learn of a business or investment opportunity through the use of corporate property or information or your position within the Company, you should only participate in the business or make the investment with approval from the Managing Director and CEO. As a general principle, you should only participate in a joint venture, partnership or other business arrangement with the Company with approval from the Managing Director and CEO.

(e) Conflict of interest arising from a personal relationship

Employees who have the responsibility for or authority to affect the careers or employment of other employees should perform their functions free from any conflict of interest arising from a personal relationship.

For example, a conflict of interest will arise from a personal relationship if you have a family, business or personal relationship (including a personal financial interest, sharing living quarters or a romantic relationship) with any other employee within the Company and that relationship causes, or might reasonably be anticipated to cause, an inability on your part or their part to perform responsibilities objectively and impartially as far as the other party to the relationship is concerned.

You must disclose any conflict of interest arising from a personal relationship to either your manager or the Company Secretary. Such disclosures will be treated confidentially.

(f) Outside memberships, directorships, employment and public office

The Company supports involvement of its employees in community activities and professional organisations. However, outside employment or activity must not conflict with an employee's ability to properly perform their work for the Company, nor create a conflict (or the appearance of a conflict) of interest.

Before accepting outside employment or a position on the board of directors of another company or non-profit organisation, you must carefully evaluate whether the position could cause, or appear to cause, a conflict of interest. If there is any question, consult either a member of the executive team or the Company Secretary.

You must obtain prior written consent from the Managing Director and CEO where the proposed employment or position relates to an outside organisation that has or seeks to have a business relationship with the Company.

You may accept public office or serve on a public body in your individual private capacity, but not as a representative of the



Company. If such public office would require time away from work, you must comply with Company policies regarding leave of absence and absenteeism.

(g) Use of Company name

You may not use the Company's name or purchasing power to obtain personal discounts or rebates unless the discounts or rebates are made available to all employees.

6 Improper use or theft of Company property, assets and email

You are responsible for protecting any Group property and assets that are under your control and you should safeguard them from loss, theft and unauthorised use.

Group property and assets includes cash, securities, business plans, third party information, intellectual property (including computer programs, software, models and other items), confidential information, office equipment and supplies.

You must not:

- use Group assets for any unlawful purpose or unauthorised personal benefit;
- remove Group property and documents from official premises without a good and proper reason. If required to be removed, they should be stored in a secure manner and covered by appropriate insurances; and
- make improper disclosure, including inadvertent or careless disclosure, of competitive business strategies and plans.

You are encouraged to use common sense and observe standards of good taste regarding content and language when creating documents that may be retained by the Group or a third party. The Group's electronic communications systems should not be used to access or post material that violates Group policies or any laws or regulations. Personal non-business use of the Group's electronic communications systems must also be consistent with any policy adopted by the Group from time to time.

7 Privacy

The Company respects your privacy and the privacy of others.

You should familiarise yourself with, and comply with:

- the privacy laws of Australia; and
- the Company's privacy policies which detail the appropriate use of personal information.



If you have any questions in relation to privacy, please contact the Managing Director and CEO or the Company Secretary.

8 Public communications and disclosures

You are responsible for the integrity of the information, reports and records under your control and you are expected to exercise the highest standard of care in preparing draft materials for public communications.

Those documents and materials should:

- comply with any applicable legal requirements;
- be fact checked, proof read, concise and balanced in its disclosure;
- fairly and accurately reflect the transactions or occurrences to which they relate; and
- not contain any false or intentionally misleading information, nor intentionally misclassify information.

Media statements and official announcements may only be made by persons authorised under the Continuous Disclosure Policy. If you receive a request for information and you are not authorised to respond to the enquiry, refer the request to the appropriate person. Unless the Managing Director and CEO has given prior written consent, Company employees and associated parties must not participate in public forum discussions (including internet-based forums) and social media platforms where the subject matter is related to the Company, its competitors or the industry in which the Company operates.

The Company has adopted the Continuous Disclosure Policy as a means of ensuring compliance with its disclosure and communication obligations under the *Corporations Act 2001* (Cth) and the ASX Listing Rules. The aim of the Continuous Disclosure Policy is to keep the market fully informed of information that may have a material effect on the price or value of the Company's securities, and to correct any material mistake or misinformation in the market.

Ensure that you are aware of the requirements of the Continuous Disclosure Policy and, if it applies to you, you must act in accordance with the policy.

9 Employment practices

(a) Equal opportunity and anti-discrimination

The Company is committed to:

- equal employment opportunity;
- compliance with the letter and spirit of a full range of fair employment practices and anti-discrimination laws; and
- a workplace free from any kind of harassment, bullying, victimisation or discrimination of employees.

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The Company's Diversity Policy can be found on the Company's website. All employees are expected to be familiar with this policy.

The Company will promptly investigate all allegations of harassment, bullying, victimisation or discrimination and will take appropriate corrective action. Retaliation against individuals for raising claims of harassment or discrimination will not be tolerated.

(b) Occupational health and safety

The Company is committed to maintaining a healthy and safe working environment for its employees. All appropriate laws and internal regulations (including occupational health and safety laws) should be fully complied with. All people have obligations to assist in ensuring that this situation is maintained at all times.

The Company is also committed to a drug and alcohol free workplace. It has a strict prohibition on conduct such as the use, sale, transfer or possession of illegal drugs or the use of alcohol whilst on Company premises, or premises under the control of the Company, or in a Company vehicle or reporting to work or being on Company property impaired by alcohol & drugs.

You should familiarise yourself with the Company's occupational health and safety policies and all relevant procedures to ensure the workplace is safe and without risk to the health of others and yourself. You should follow any lawful and reasonable instructions consistent with that policy and those procedures.

(c) Company reputation

Employees must not act in any way that could cause harm to the Company's reputation or market position. Employees have a duty to act in a manner that merits the continued trust and confidence of the public.

(d) Securities trading

The Company is committed to upholding fair and ethical securities trading practices complying with all laws and avoid any conflicts of interest.

Employees must not:

- use any price-sensitive information (which is not generally available to others) in deciding whether or not to buy or sell the Company's securities;
- deal with the Company's securities when in possession of price-sensitive information about the Company which has not been publicly disclosed; and



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- act contrary to the Company's Securities Dealing Policy (which provides guidance on when employees are likely to possess price-sensitive information).

You should familiarise yourself with the Company's Securities Dealing Policy and ensure you act in accordance with it in conducting any dealing in the Company's securities.

Under the Securities Dealing Policy, employees are subject to certain dealing restrictions, including that they are required to seek approval prior to dealing, and to take steps in relation to dealings by their spouses and other "connected persons". See the Securities Dealing Policy for further details.

(e) Bribes, inducements and commissions

You must not pay or receive any bribes, facilitation payments, inducements or commissions (this includes any item intended to improperly obtain favourable treatment or avoid unfavourable circumstances).

You must not give or receive any unreasonable gifts or otherwise act in an unethical way. Remember that agreeing not to act may have the same ramifications as acting in an unethical way.

Please see the Anti-Bribery & Corruption Policy and the Donations and Community Investments Policy for more details.

10 Community

(a) Contribution to the community

The Company is a responsible corporate citizen and actively supports the communities in which we live and work. Each employee is expected to uphold the Company's commitment to pursue good corporate citizenship while engaging in its corporate activity.

You must abide by all local laws and regulations, and are expected to respect and care for the environments in which the Company operates.

The Company supports and encourages you to actively contribute to the needs of the community. If you wish to make such a contribution (such as donations or sponsorship) on behalf of the Company, consult the Managing Director and CEO for approval.

Please see the Donations and Community Investments Policy for more details.

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(b) Environment

The Company is committed to doing business in an environmentally responsible manner and identifying environmental risks that may arise out of its operations.

If you are aware of, or suspect, an action that is not environmentally responsible or in breach of the applicable laws and regulations, report the matter in accordance with section 11 below – ‘What to do if you suspect the Code of Conduct has been breached’.

(c) Politics

You may voluntarily participate in the political process as an individual. We ask that you do not engage in actions that could cause someone to believe that your actions reflect the views or position of the Company, if that is not the case.

It is against Company policy to use corporate funds for political purposes unless approval is obtained in accordance with the Anti-Bribery & Corruption Policy and the Donations and Community Investments Policy. This policy does not prohibit:

- communications by the Company to its shareholders on any lawful subject;
- payments of salaries and expenses of employees whose duties may include communication with government officials; or
- political activity by any employee in his or her individual, private capacity. However, to eliminate any appearance of coercion in such political activities, it is against Company policy for any supervisor to solicit funds from a subordinate for political purposes.

11 What to do if you suspect the Code of Conduct has been breached

If you have reasonable grounds to suspect the Code of Conduct has been breached, you are responsible for reporting that information in accordance with the Company’s Whistleblower Policy.

The Board wants all personnel to feel safe and supported in raising concerns under the Whistleblower Policy. The Policy contains information on who you can speak to and how to contact them, as well as protections that you are entitled to under the Policy and under the law.

You can contact the Company Secretary if you have any questions or want more information.



12 Consequences of breaching the Code of Conduct

The Company recognises that breaches of the Code of Conduct may occur from time to time.

Depending on the nature of the breach, penalties may be imposed ranging from counselling to dismissal or termination of the contract or engagement. The Company will act objectively and in accordance with any applicable provisions or requirements in an employment contract.

The Company reserves the right to inform the appropriate authorities where it is considered that there has been criminal activity or an apparent breach of the law.

13 Who to speak to if you have questions

The Code of Conduct does not include:

- every ethical issue that an employee might face; nor
- every law and policy that applies to the Company.

In representing the Company you are expected to act in a manner consistent with the key values underpinning the Code of Conduct, namely:

- our actions must be governed by high standards of integrity and fairness;
- our decisions must be made in accordance with the spirit and letter of the applicable law; and
- our business must be conducted honestly and ethically, with our best skills and judgment, and for the benefit of customers, employees, shareholders and the Company alike.

If you have any questions regarding the Code of Conduct or any of the Company's policies at any time, you should contact the Company Secretary.

Adopted by the Board on 27 January 2021.