

**COMMITMENT**

Version 1 | February 2021

Allup Silica values the core principles of respectful relationships, personal integrity and accountability. They will underpin the way in which we do business and interact with our customers and the communities in which we operate.

Contractors, Consultants and Supplier Partners engaged by the Company (including their subsidiaries and subcontractors) must also abide by these principles, and agree to conduct their operations in accordance with this Policy.

Across all operations, Allup Silica holds itself accountable, not only to the highest industry standards but to its own strict requirements for ethical conduct. This is not only the right thing to do, it is critical if trust in our operations is to be maintained and our social license to operate continually strengthened.

The three key principles:

**1. Respectful Relationships**

That all people that we work and engage with are treated with respect and courtesy, and that we recognise that their involvement, human rights, and onsite safety and welfare are important to the business of the Company.

**2. Personal Integrity**

That the decisions we make will at all times be honest and delivered in a timely manner, and that in considering all the information to hand relevant to the task, it will be fair and impartial.

**3. Accountability**

That in undertaking our work we will operate in a responsible and accountable manner that ensures the efficient, effective and appropriate use of resources and/or information, be they human, natural, financial or physical.

At Allup Silica we seek to find, mine and process a precious mineral from the earth's resources. We approach these goals with a mindset of continuing improvement through modern, technological and innovative thinking and delivery processes, that exercise great care and caution for the environment within which it sits.

As a Contractor, Consultant or Supplier Partner, we acknowledge that the role you play is vital in helping us achieve our goals and deliver our product. This requires trust of each other, of the communities in which we operate, of the government departments and regulators with whom we work, of our customers, Shareholders and others. We will only succeed if we work collaboratively and establish trust in each other.

This Code of Conduct for Contractors, Consultants and Supplier Partners (CC&S Partners) seeks to set the expectations we have of you and the people you employ or partner with. We may elect not to work with, or call a halt to the work offered to you, if our expectations are not met or our policies not adhered to. Only by working together, with all of us conducting business in the way in which we define, can we hope to succeed without conflict.

If you have questions regarding the Contractors, Consultants and Supplier Partners Code of Conduct, or about our expectations, please contact the Company at [team@allupsilica.com](mailto:team@allupsilica.com).

**1. Health & Safety**

We are committed to the goal of every worker providing services to the Company returning to their homes at the end of each work day safely and healthily. Our CC&S Partners will:

- Provide a safe and healthy working environment for their employees and subcontractors including the provision of all appropriate personal protective equipment.
- Take all practical and reasonable measures to eliminate workplace fatalities, injuries and disease, including the reporting and removal of hazards if identified.
- Ensure all their people are trained and accredited in accordance with all relevant HS&E legislation, standards, codes of practice and related Allup Silica policies, and are appropriately trained for the work that they do.
- Ensure that any accommodation provided for their employees and subcontractors (if required) meets all health and safety requirements and respects both worker dignity and their right to privacy.



## 2. Personal & Professional Behaviour

Respectful relationships and personal integrity underpin our beliefs and operations. Our CC&S Partners will:

- Be honest, reasonable, fair and sensitive to all points of view when dealing with members of the public and other workers.
- Give accurate and impartial advice in a professional way to the Company or government and/or other regulators involved with operations.
- Follow all relevant legislative, industrial and administrative requirements.
- Adhere to all equal opportunity and diversity principles adopted by either the Company or government.

## 3. Alcohol & Drugs

Allup Silica has an obligation to provide a safe working environment. As such, it has zero tolerance for alcohol and drugs within the workplace. Our CC&S Partners will:

- Ensure that no business is conducted by employees, subcontractors or associated stakeholders under the influence of any drug or substance that is likely to adversely affect the ability to work safely, or that may pose a risk to themselves, other staff or workers on site, or members of the public within the communities in which we work.
- Establish appropriate reporting/recording mechanisms for employees, subcontractors or associated stakeholders who are taking prescription medication that may have an adverse effect when driving or operating machinery, or that may be detected during a random drug and alcohol test.
- Be aware that Allup Silica reserves the right to introduce drug and alcohol testing for employees and other workers at site on either a random, or 'with cause' basis.

## 4. Governance, Legal Compliance & Conflicts of Interest

We operate within a competitive industry in an ethical and lawful way, and we comply with all applicable laws and regulations and are guided by all relevant HS&E legislation, standards and codes of practice. We expect our CC&S Partners to:

- Ensure that their personal activities and/or interests, as well as those of their employees, subcontractors and other associated stakeholders do not conflict with their responsibilities to Allup Silica.
- Conduct their businesses in accordance with all legal obligations (under both State and Commonwealth laws) and to maintain accurate financial and operational records in accordance with all applicable taxation, legal and regulatory requirements and accepted accounting practices, including the retention of records, and to make these available upon request when there is an obligation to do so.
- Report on the economic, social and environmental performance measures required to meet both regulatory and contractual requirements and to make these available to the Company if relevant and required.
- That any financial interests that you or relatives may have, that could impact your honest and impartial advice to the Company is declared prior to the work being done.
- That if you hold personal, philosophical, religious, moral or political beliefs or attitudes that could influence your ability to provide the honest and impartial services required by the Company, that these are declared prior to the work being done.
- That acts of bribery or corruption in any form, including the practice of facilitation payments is strictly forbidden.
- Comply with the Company's Health and Safety Policy.
- Maintain policies and practices that allow violations, misconduct or grievances to be reported by workers and addressed without fear of retaliation.

## 5. Intellectual Property & Confidential Information

We build trust by communicating openly and honestly and leading by example insofar as business reporting and relevant information sharing requires. We respect the intellectual property rights of companies with which we work. At times we may need to share information with our CC&S Partners that is commercial and confidential.



Our CC&S Partners are expected to:

- Ensure that the intellectual property (IP) rights of other parties at operations (whether it be patents, industrial designs, trademarks, copyright, inventions, and confidential information) is respected and not disclosed or used without proper process.
- Exercise caution and sound judgement in discussing sensitive operational or business information with employees or other parties.
- Ensure that information gained in your professional capacity is not used for personal gain or used to cause harm or detriment to other parties.

## **6. Environment & Land Management**

We are committed to protecting the environmental values of the region in which we operate, and in maintaining a responsible stewardship role for the long term. Our CC&S Partners are expected to:

- Promote a culture that values the environment and actively acts to protect it.
- Continuously improve the understanding and practices of environmental and resource management, including the adoption of concepts such as minimal impact, reuse and recycle.
- Comply with the Company's Environmental and Sustainable Land Management Policy.
- Ensure that the measurement, management and reporting of all environmental data is in accordance with applicable laws and regulations, and that the records are made available to the Company when required.

## **7. Emergency Preparedness**

We operate within the natural environment and are prepared to face sudden and immediate natural hazards and other dangers.

Our CC&S Partners are expected to:

- Ensure they have adequate emergency preparedness and response plans to safeguard their employees, subcontractors and other associated stakeholders in times of sudden natural events such as bushfires, other catastrophe, pandemic management or other unforeseen events.
- Maintain a worker at the site who is qualified to a Senior First Aid Certificate level to manage minor unexpected incidents from the natural environment until help arrives (such as snake bite).

## **8. Community Liaison & Engagement**

We have a strong commitment towards meaningful and respectful relationships with our local and regional communities based on the shared goal of mutual benefit and opportunity. We have a desire to learn from these communities, and in building upon and strengthening our social license to operate within them. Our CC&S Partners are expected to:

- Work with the Company to build trust with the communities in our area of operations.
- Provide the level of advice and information, as and when needed, to help the communities understand the extent of operations, any impacts and how they will be mitigated.
- Comply with the Company's Communities and Social License to Operate Policy.
- Support the Company's community engagement initiatives and offer employment or other procurement opportunities if at all possible.

## **9. Breaches of Code**

Contractors, Consultants and Supplier Partners who work with Allup Silica will work in accordance with the principles and requirements of this Code of Conduct. Allup Silica may take action for breaches of this Code that may include termination of the contract. In serious cases, the matter may be referred to appropriate authorities.