



INTRODUCTION

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, the communities in which we operate and each other. Employees of the Company must abide by these core principles, and agree to carry out their duties, and conduct their activities 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. Employees have a crucial role in this.

The three key principles are:

- **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.
- **Personal Integrity**
That the decisions we make will at all times be honest and delivered in a timely manner.
- **Accountability**
That in undertaking our work we will operate in a responsible and accountable manner that ensures the efficient, effective and appropriate use of Company 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 functions with a mindset of continuing improvement through modern, technological and innovative thinking and delivery processes, that exercises great care and caution for the environment within which it sits.

This Code of Conduct for Employees seeks to set the expectations we have of you. We all must operate and behave in accordance with these values. Only by working together, with all of us conducting business in the way in which we define, can we hope to succeed without conflict.

The following statements are all equally applied in this Code of Conduct:

1. Compliance

Employees must be aware of, and adhere to, all Company policies, especially those relating to Health and Safety, Diversity and Equal Opportunity, Environmental and Land Management, Communities and Social License and Cultural Heritage. In the course of duties all relevant legislation must be complied with.

2. Personal & Professional Behaviour

Employees are expected to demonstrate the same respectful relationships and personal integrity that underpins the Company's beliefs and expectations. You are to:

- Be honest, reasonable, fair and sensitive to all points of view when dealing with other workers or members of the public.
- 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.
- Avoid real or perceived conflicts of interest, with prompt disclosure made to the Company if either of these situations arise.
- Refuse gifts involving travel, accommodation and entertainment as this may give rise to the perception of an expectation for preferential influence.
- Ensure all transactions in Company Shares fully comply with the law and related Company policies.
- Perform all duties with skill, honesty, care and diligence, using authority in a fair and equitable manner.
- Promote the interests of, and be an ambassador for the Company wherever it is that you are working.



3. Harassment and Bullying Behaviours

Employees must never engage in actions or behaviours that entail harassment or bullying. These are defined as any undesirable action or behaviour that a reasonable person would find unwelcome, humiliating, intimidating or offensive. Repeated behaviours of this nature, directed towards an individual or group of people creates a serious risk to workplace health, safety and well-being. It is not tolerated.

4. Alcohol and Drugs

Employees are expected to uphold the Company's policy of ensuring a safe working environment. As such, no employee should attend for work duties if they have alcohol and/or drugs (including any prescription drugs that may impact their ability to drive vehicles or work with equipment) in their systems. In addition, you are to:

- Ensure that no operations are undertaken by fellow employees, subcontractors or associated stakeholders who you either suspect, or believe to be under the influence of any drug or substance that is likely to adversely affect their 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.
- Make certain that the appropriate reporting/recording mechanisms are followed in the event that an employee, subcontractors or associated stakeholders is removed from duty because of this fact.
- Be aware that drug and alcohol testing for workers at site may occur on either a random, or 'with cause' basis.

5. Intellectual Property & Confidential Information

Information obtained in the course of employment must not be used or disclosed to obtain financial reward or benefit, or to take advantage of another person. Trust must be built by communicating openly and honestly and leading by example. You are to:

- Ensure that the intellectual property (IP) rights of other parties working at our operations (whether it be patents, industrial designs, trademarks, copyright, inventions, and confidential information) are respected and not disclosed or used without proper permissions and 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.
- Unless governed by law or otherwise agreed to in writing, any IP developed by an Employee as a direct result of employment with Allup Silica is the sole property of the Company.

6. 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. You are to:

- Work cooperatively 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 they may have, 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.
- Ensure that no damage is caused to community-owned or private facilities in the course of undertaking work-related duties.
- Work to enhance the Company's reputation at every opportunity whilst working with our local communities.



7. Corrupt Practice

Employees are not to offer inducements, make promises, or give/demand/accept any undue advances whether they be directly, or indirectly from a public or political official or candidate, a community leader or any other person in a position of public trust or influence in order to obtain, retain or secure improper advantage in the conduct of Company operations.

8. Use of Company Property & Assets

Allup Silica property, funds, tools, equipment, vehicles, facilities and services must only be used for the purposes of Company business and operations unless express consent has been given.

9. Public Communications

The Company's external relationships, especially those with the media and the investment community, are to be conducted by the Managing Director, or as delegated by either the Managing Director or Chairman.

10. Breaches of Code

Employees have a duty to observe this Code of Conduct, and to ensure that no breaches occur. There is also a duty to report any known or suspected breaches of the Code, using the provisions of the Company's Whistleblower Policy. Any Employee, who in good faith makes any such disclosures will not be disadvantaged or prejudiced in any way. All reporting will remain confidential, and Employees found to be in breach following the completion of all due processes, will face disciplinary action and/or dismissal.

Allup Silica acknowledges the traditional custodians of country throughout Australia and their connections to the land, sea and community. We pay respect to their Elders past, present and emerging, and extend that respect to all Aboriginal and Torres Strait Islander peoples today.
