



Code of Ethics

February 2025

Context & Purpose

Xenith Holdings Pty Ltd (Xenith) and its controlled entities, comprises professionally qualified individuals offering a wide range of services within the Mining and Resources Industry. The 'Code of Ethics' represents the core values of Xenith, all Staff and contractors engaged by Xenith (Staff) are required to comply with this policy.

The purpose of the 'Code of Ethics' is to ensure the highest standards of professionalism are applied by Xenith Staff, that their personal integrity is enhanced, and that the corporate integrity of Xenith is upheld.

Xenith Values



- › As a guiding principle Xenith considers the safety, welfare and health of Xenith Staff, Clients and the Community to come before other professional responsibilities.
- › Xenith has the highest professional and ethical standards and always requires its Staff to maintain those highest standards.
- › Xenith delivers services fairly, effectively, impartially and respectfully to Clients.
- › Xenith and its Staff maintain the confidentiality of Client information at all times and ensure such information is only used for proper purposes.
- › Xenith will only accept instructions from Clients that are not in conflict with current roles for Xenith with other Clients and will only act for Clients in a manner that will not cause a reasonably foreseeable conflict for Xenith or current Xenith Clients.

Code of Ethics: Application



The 'Code of Ethics' is set out in broad terms. It contains guiding principles to help Staff through various ethical situations that may arise in their day-to-day professional work. The notes set out below are intended to guide Staff in making their own ethical decisions, with a view to uphold their professional standards and the reputation and integrity of Xenith.

If a Staff member has doubts concerning an ethical situation they are encouraged to discuss it with their Manager or the Managing Director. The key 'Code of Ethics' values are addressed below.

Not compromise on Safety, Welfare and Health

Xenith Staff shall ensure that they do not compromise the safety, welfare or health of others and should always work in conformity with acceptable technical standards.

Maintain the highest Ethical and Professional Standards

Xenith Staff shall endeavour by its behaviour to uphold the highest ethical and professional standards. Xenith Staff shall:

- › Maintain professional skills, knowledge and standards through membership of professional bodies and industry networking
- › Foster an environment of professional development through training and mentoring of Xenith Staff
- › Not involve themselves with any business relationship or professional practice which they know to be unethical, fraudulent or dishonest
- › Not use association with other persons, corporations or partnerships to conceal unethical acts.

Deliver Professional Services

Xenith Staff shall always deliver services fairly, effectively, impartially and respectfully to Clients. Xenith Staff shall:

- › Make all statements in a professional capacity objectively, truthfully and free of any influence which may compromise their professional judgement
- › Perform work in their areas of expertise - Staff shall inform their Clients and make appropriate recommendations on obtaining further advice, if an assignment requires qualifications and experience outside of their field of competence
- › Give proper credit for professional work to those to whom credit is due and to acknowledge the contribution of subordinates and others.

Maintain the proper use and protection of Confidential Information

Xenith Staff shall always protect the privacy of confidential, sensitive or private information (Confidential Information). Xenith Staff shall:

- › Treat all client information with the utmost confidentiality at all times
- › Not divulge Confidential Information outside of Xenith unless otherwise authorised by the owners of that Confidential Information
- › Only use Confidential Information for proper purposes.

If you are ever asked to divulge confidential information about a client by a person who has no authority to request this, or you ever hear a Xenith Staff member discussing information of a confidential and/or private nature in an inappropriate way, you must report the matter to your Manager immediately.

To maintain proper use and protection of Confidential Information Xenith has:

- › A process for recruitment and selection of Staff, incorporating reference checks
- › Induction training of new Staff on confidentiality and record keeping policy and procedures
- › Staff training, reinforcing Xenith policies and informing Staff of any changes to policies
- › Security systems in place to monitor and record computer access to information
- › Security systems in place to regulate level of access to information for different Staff.

If Xenith policy and procedure regarding confidentiality of client information is not followed, breach of this Policy may result in immediate termination of employment/engagement without further reason or compensation in excess of that required by law.

All Staff at Xenith are required to sign a confidentiality agreement when they commence employment. This is a legally binding document that clearly states your obligation to treat all client information in a confidential manner.

Controlled access to Records

- › All Xenith records including those that hold client, Staff and Xenith owned Confidential Information (Records) may only be stored on paper or Xenith supplied information storage systems. Staff are not permitted to store Records on their storage systems such as cloud storage systems. Staff are not permitted to link cloud storage systems to Xenith issued computers, smart pads, smart phones or other systems.
- › Staff do not all require the same level of access to information. The level of access required is determined by the person's job or project role.
- › Access may be granted whilst a Staff member is working on a particular job and then withdrawn if the level of access required changes.
- › Computer access is monitored and restricted to ensure that client confidentiality is maintained.

Only accept assignments not in Conflict with current Roles

Xenith staff must disclose, and take reasonable steps to avoid, any conflict of interest (real or apparent).

- › Staff must not make improper use of: (a) inside information or (b) the employee's duties, status, power or authority, in order to gain, or seek to gain, a benefit or advantage for the employee or for any other person.
- › Before accepting any instructions from Clients, Xenith must ensure that the acceptance and carrying out of those instructions:
 - will not cause any conflict in relation to any other existing assignments being carried out for any other clients; or
 - if the acceptance or carrying out of those assignments will cause any conflict in relation to any other existing instructions being carried out for any other clients, the informed consent of all interested parties will be obtained.
- › External confidence in the integrity of the Xenith is vital. Confidence may be jeopardised if the business community perceives a conflict of interest. To manage potential conflicts of interest Xenith:
- › Requests applicants to declare any real or apparent conflicts of interest during the employment selection process.
- › Employees have a responsibility to:
 - Avoid situations in which his/her private interest, whether pecuniary or otherwise, conflicts or might reasonably be thought to conflict with his/her work duties
 - Not use information obtained in the course of official duties to gain directly or indirectly a pecuniary advantage for himself or for any other person
 - Notify their Manager about any real or apparent conflicts of interest.
- › Managers have a responsibility to decide whether:
 - There is or could be a conflict of interest
 - To ask the person to divest any interest that may be deemed in conflict
 - To change the persons duties such that there is no conflict
 - To allow the person to continue their duties.

Disclaimer

The Company reserves the right to amend or rescind this procedure at any time without notice.

Xenith acknowledges the AusIMM and MICA in preparing this Code of Ethics policy.

Document Control

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