



TRINITY
METALS

GROUP POLICY

CODE OF CONDUCT

CONTENTS

INTRODUCTION	3
1. Purpose.....	3
2. Application.....	3
3. Commencement	3
4. Authority and Management.....	3
POLICY	4
1. Responsibility to Shareholders	4
2. Integrity and Honesty.....	4
3. Respect for the Law and Internal Rules and Regulations	4
4. Conflicts of Interest	4
5. Use of Company Assets.....	5
6. Confidential Information.....	5
7. Employment Practices.....	5
8. Responsibility to the Community and the Environment.....	6
9. Responsibility to the Employee.....	6
10. Fair Trading and Dealing Obligations.....	6
11. Responsible Supply Chain of Minerals	6
12. Compliance with Code of Conduct	6
13. Periodic Review of Code.....	7

INTRODUCTION

1. Purpose

The Code of Conduct policy sets out the required principles and standards with which the Board, Management and Employees of the Company must comply when conducting company business and dealing with each other, our shareholders, stakeholders and the broader community.

2. Application

This policy applies to Trinity Metals and all affiliated companies (Trinity Metals Group). It applies to all personnel of the Trinity Metals Group, whether Directors, Employees, Consultants or Contractors, and whether working part-time or full-time on Trinity Metals business ("Trinity Metals personnel").

3. Commencement

This policy applies from September 2022.

4. Authority and Management

The Board of Directors approved this policy and will review it periodically, not less than every two years or any other time deemed necessary.

POLICY

1. Responsibility to Shareholders

The Company aims:

- to increase shareholder value within an appropriate framework which safeguards the rights and interests of the Company's shareholders and other relevant stakeholders; and
- to comply with systems of control and accountability that the Company has in place as part of its corporate governance with openness and integrity.

2. Integrity and Honesty

Directors, Management and Staff, shall deal with the Company's customers, suppliers, competitors and each other with the highest level of honesty, fairness and integrity and comply with the legal and regulatory environment in which the Company operates.

3. Respect for the Law and Internal Rules and Regulations

The Company will comply with all legislative and common law requirements applicable to its business, including those regarding Labour, occupational health and safety, the environment, land, tax, cultural heritage and all other relevant policies, procedures & instructions. Any transgression from the applicable regulations must be reported through the manager and escalated to the CEO. The CEO will report severe breaches to the Chairman of the Board.

4. Conflicts of Interest

Directors, Management and Staff, must not get involved in situations with an actual or apparent conflict of interest. Where a real or apparent conflict of interest arises, the matter should be brought to the attention of:

- the Chairperson in the case of a Board Member;

- the CEO in the case of a member of Management; and
- the General Manager in the case of an Employee below management level,

so that the matter may be considered and dealt with appropriately.

5. Use of Company Assets

Directors, Management and Staff must only use company assets for authorised Company Business. Company assets such as property, equipment, company information and any other company assets may not be used for personal gain, the benefit of a third party, or in any way that places the Company at a disadvantage. Any uncertainty regarding a specific situation should be elevated for approval by management before proceeding.

6. Confidential Information

Directors, management and staff must respect the confidentiality of all information acquired during the Company's business and not disclose or make improper use of such confidential information to any person/body/group unless specific disclosure authorisation has been obtained.

7. Employment Practices

The Company will employ the best available staff with the skills, knowledge and experience required to carry out the duties of the specific role. We strive to provide equal opportunities in all aspects of employment and create a workplace free of discrimination.

The Company will ensure a healthy and safe workplace and maintain proper occupational health and safety practices.

The Company commits to ensuring that human rights as they relate to our workplace and labour are observed.

8. Responsibility to the Community and the Environment

The Company will recognise, consider and respect environmental issues which arise due to the Company's activities by embedding environmental standards that comply with all applicable legal requirements. The Company will constructively engage with our host communities and positively contribute to Corporate Social Responsibility (CSR) activities.

9. Responsibility to the Employee

The Company recognises and respects the rights of our staff members and will comply with the applicable regulations regarding information privacy, data protection, and the right to privileges related to confidential information.

10. Fair Trading and Dealing Obligations

The Company will deal with all stakeholders with respect, consistency and fairness. The Company does not tolerate deceptive, unethical or corrupt practices. The Company's Antibribery Policy provides further detail in this respect.

11. Responsible Supply Chain of Minerals

The Company abides by the principles set out in the 2016 OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from conflict-affected and high-risk Areas.

12. Compliance with Code of Conduct

Any compliance breach with this Code of Conduct must be reported directly to the CEO or Chairman. Any violation of this code will be managed in accordance with the Company's Disciplinary Policy and could result in termination and further criminal charges being pursued in line with the applicable legislation. Failure to report such a breach by a Colleague or a Line Manager will equally result in disciplinary proceedings.

13. Periodic Review of Code

The Group Legal Counsel and Company Secretary will monitor Compliance with this Code of Conduct periodically by liaising with the Board, Management and Staff, especially in relation to any areas of difficulty arising from this Code of Conduct and any other ideas or suggestions to improve it. Suggestions for improvements or amendments to this Code of Conduct can be made at any time by providing a written note to the Legal Counsel and Company Secretary.