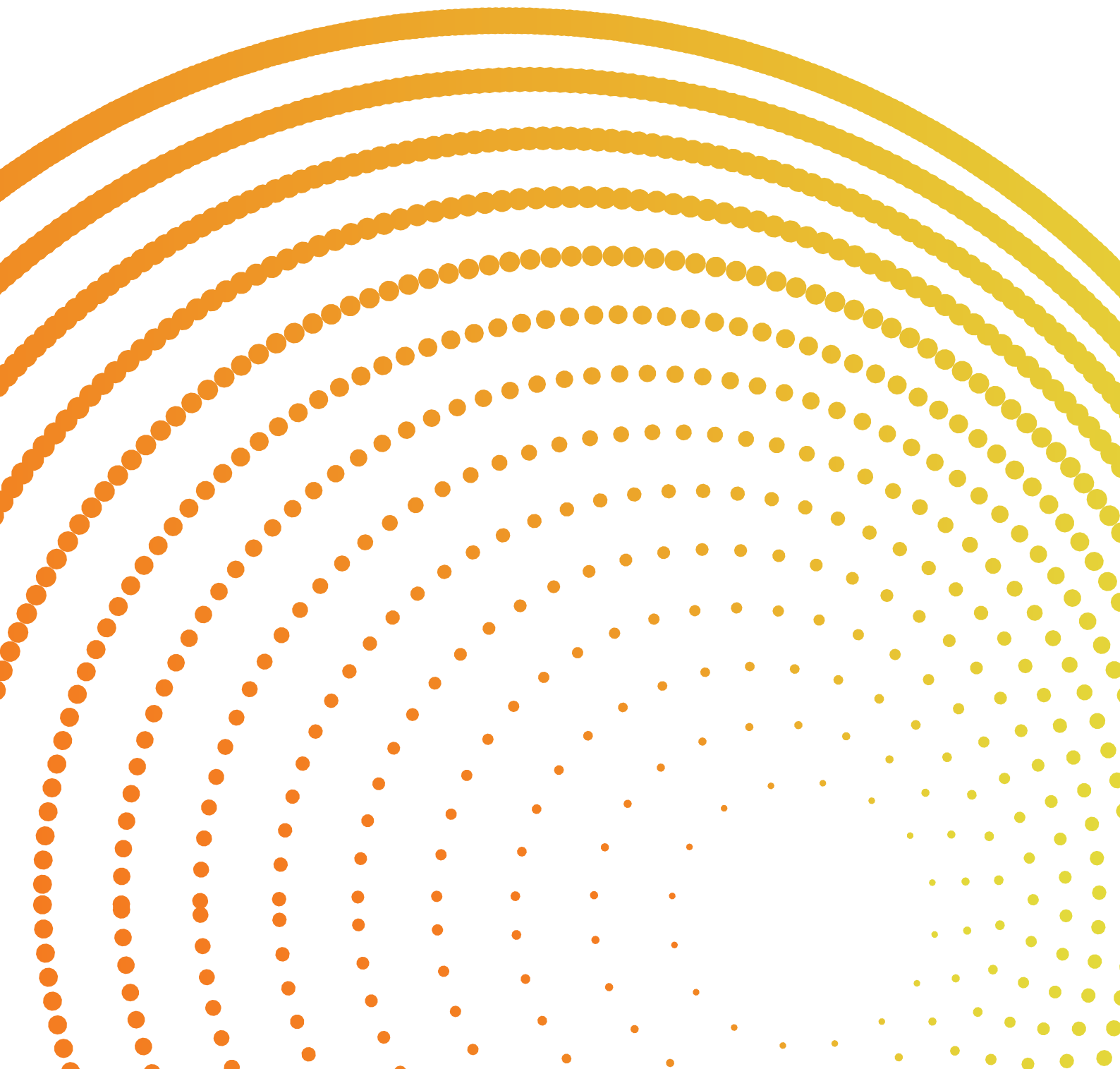

Code of Conduct Policy 2022

MOLYCOP

Molycop Legal



Code of Conduct Policy

Definitions

In this document, the following definitions apply:

- **Code** means this Code of Conduct
- **Molycop** means any company or business within the Molycop group of companies and businesses, including any other companies and businesses that may be acquired by or form part of the Molycop group from time to time
- **Employees** means any of Molycop's employees, contractors, consultants, suppliers and agents.
- **CEO** means the Molycop Chief Executive Officer
- **CEO Direct Reports** means those executives who report directly to the CEO
- **Senior Management** means the CEO, the CEO Direct Reports and the employees who report directly to them.

Introduction

Molycop is committed to its companies, employees, contractors, consultants, agents and directors adhering to high standards of business conduct whilst complying with the law, delivering outcomes and being accountable. It is recognised that high ethical standards are valuable to companies, customers and the business community at large and offer benefits by:

- Enhancing Molycop's reputation for fair and responsible trading;
- Helping to maintain high standards of behaviour throughout Molycop;
- Giving all employees a clear idea of what Molycop is setting out to do and how it will do it; and
- Helping to develop pride among employees and giving a focus to the organisation as a whole.

Accordingly, this Code, together with a number of other policies, have been developed setting out expectations and guidelines for business conduct and establishing procedures for reporting and remedying any transgression from the standards contained in this Code and Molycop's other policies.

Scope

This Code applies globally to all companies and businesses within the Molycop group and to their directors (including non-executive directors) and employees.

Molycop requires all contractors, consultants, suppliers and agents engaged to perform work for or on behalf of Molycop to comply with this Code and with other applicable Molycop policies.

Accountabilities

Responsibilities of directors and employees

All directors and employees are expected to be familiar with the contents of this Code. Employees must also have a detailed understanding of Molycop's business practices and policies that directly relate to their role and place of employment. It is every employee's responsibility to comply with this Code. Employees should seek assistance from a manager or supervisor, legal adviser or other source of advice identified in this Code if they do not fully understand how it should be applied.

Responsibilities of managers and supervisors

Managers and supervisors must take all reasonable steps to ensure that Molycop's employees and, where appropriate, consultants, contractors and business partners, are aware of and comply with this Code. They must consult with the next level of management if problems occur. Managers and supervisors must also:

- ensure that all employees have access to relevant Molycop policies and procedures;
- respond promptly and seriously to employees' concerns and questions about business conduct issues and seek further assistance if required; and
- demonstrate exemplary behaviour that other employees can follow.

Responsibilities of senior management

Management is responsible for Molycop's performance under this Code.

Senior Management have operational responsibility for ensuring compliance with this Code. In meeting this responsibility, Senior Management must ensure that each region and corporate function:

- fosters a workplace environment that promotes and encourages honest and open communication about business conduct issues, emphasizes the importance of operating in accordance with this Code and avoids placing pressure on employees to deviate from the standards contained in this Code;
- establishes internal reporting and approval processes that address identified high risk areas in relation to business conduct;
- prepares supplementary guidance and support for employees about how to conduct business in particular markets consistent with this Code;
- undertakes training consistent with this Code and tailored to the operational needs of the business;
- follows relevant procedures for reviewing the credentials of others such as consultants, contractors and partners before entering agreements with them; and
- incorporates the key elements outlined in this Code in performance management processes, employment contracts, induction procedures, industrial agreements and similar systems.

Breaches Of The Code

Any individual who breaches this Code, any of the guidelines under it or any Molycop policies, or who authorises, is aware of or permits any breaches will, subject to a review of the circumstances, be subject to disciplinary action including possible dismissal.

The highest standards of corporate conduct are critical to Molycop's reputation and success and therefore employees are encouraged to report any actual or suspected breach of the Code.

If you become aware of conduct which causes you concern or a decision or action which appears to be inconsistent with the intent of this Code, you should immediately report it to your manager or supervisor, who has a responsibility to report the matter to Senior Management.

If you feel unable to do this, there are a number of other avenues for raising a question or concern, as outlined below.

Alternatives for raising a question or concern

You can contact:

- any member of Senior Management and, if you choose, can ask to remain anonymous;
- Molycop's Human Resources, Legal or Finance functions;
- your relevant General Manager or Regional President (or equivalent such as country President); or report any observed or suspected breach of this Code or any Molycop Policy¹ anonymously through Molycop's independent and anonymous toll free hotlines as listed in the Molycop Whistleblower Policy.

Senior Management is responsible for promptly responding to employees' questions and concerns regarding business or Molycop's conduct. They must ensure that the information they provide is accurate and that their advice is consistent with this Code. All concerns and questions must be treated seriously.

The course of action taken to answer a question or respond to a concern will depend on the nature of the issue and its severity. It may be possible to resolve a matter by involving only one person. However, some situations, such as those involving significant legal or financial matters may require advice and input from additional sources such as external legal advisers or auditors. In all cases, confidentiality will be maintained to the highest degree practicable.

Any employee who reports a breach or suspected breach of legal or ethical standards in good faith will not be subject to retaliation, retribution or other recriminations for making that report.

At times, compliance with this Code may affect Molycop's chances of winning or retaining business. Situations that involve a conflict between upholding this Code and protecting Molycop's short-term commercial interests should be openly and honestly discussed. These situations must be resolved in a manner that does not compromise Molycop's reputation or standards.

¹ including, but not limited to, instances of fraud, corruption, theft, insider trading, breach of copyright, breach of privacy/confidentiality, misuse of Company systems, bullying, harassment and/or discrimination.

SECTION 1: Legal and ethical issues

Compliance with the law

Some laws affect everyone, such as those concerning equal employment opportunity, occupational health and safety, sanctions, and bribery, fraud or corruption. Other laws primarily affect employees in particular roles, such as those concerning product liability, credit management, tax and fair competition. It is every employee's responsibility to ensure that they fully understand all laws and regulations relevant to their role.

The laws that govern Molycop's business activities may be complex, but ignorance of the law does not excuse Molycop or its employees from their obligation to comply. Employees should seek advice from the Chief Legal Officer if they are unclear about laws or regulations relating to their work. Matters relating specifically to taxation should be referred to the Vice President - Tax for guidance.

Using and accounting for company resources

Employees must not use company funds, property, equipment, or other resources for personal benefit. In addition, employees are responsible for safeguarding Molycop's resources under their control, including information, and for maintaining accurate records regarding the use of these resources. In particular:

- employees should use company funds sensibly and effectively. Expenditures must be reported accurately and in a timely manner. Submission of a fraudulent or misleading expense report is regarded as serious misconduct;
- an accurate and auditable record of all financial transactions relating to Molycop must be maintained in accordance with relevant accounting standards. No entry should be made in Molycop's financial records that distorts or disguises the true nature of any transaction. Non-financial records such as personnel files, environmental documentation, statutory records and safety statistics (**Records**) must also be accurately and rigorously maintained;
- unauthorised removal or use of Molycop equipment, supplies or other resources is regarded as theft;
- Molycop resources must not be sold, loaned or donated without management approval;
- employees should take appropriate precautions to prevent theft, damage or misuse of Molycop resources. For example, unattended buildings, storage areas and company vehicles should be locked when they are not in use;
- employees should not destroy or dispose of Molycop resources without management approval. Employees are prohibited from intentionally damaging Molycop resources; and
- disposal of Molycop's Records, and other documentation should be in accordance with the law and applicable Molycop standards and guidelines.

Confidentiality and proprietary information

Information is a valuable corporate asset. Open and effective dissemination of information is critical to Molycop's success. However, much information about Molycop's business activities is confidential and/or proprietary. Confidential information is information that Molycop considers private and that is not common knowledge outside Molycop.

Proprietary information is information Molycop owns, develops, pays to have developed, or to which it has an exclusive right. Both confidential and proprietary information can be written as well as unwritten.

Confidential information and proprietary information may include but are not limited to:

- cost and pricing, including unpublished information about past, current and future prices;
- methods by which Molycop determines its bids;
- documents, Records, or other information concerning Molycop's sales or marketing plans or activities;
- documents, Records, or other information concerning Molycop's business strategies, business results, unannounced products or services, financial results and data;
- customer, supplier, contractor and employee records;
- data entrusted to an employee by a customer, supplier, or consultant;
- software or computer systems developed by Molycop;
- Molycop's trademarks and plans for new trademarks, which include symbols, words and phrases used to identify and distinguish Molycop's products and services;
- the products of Molycop's research and development, such as inventions, patents and engineering information;
- Molycop's processes, procedures and know-how;
- organisational information;
- operational information; and
- any other information that could be of use to a competitor, customer or supplier to place Molycop at a competitive or commercial disadvantage.

Because the disclosure of such information could seriously damage Molycop's interests, safeguarding this information is the responsibility of all Molycop employees. If you learn about Molycop proprietary or confidential information during the course of your employment, you must not share it with others, including fellow employees, unless they need to know for a legitimate business reason.

You should also guard against unintentionally disclosing proprietary or confidential information. Situations that could result in inadvertent disclosure of such information that you should be sensitive to may include but are not limited to:

- discussing confidential or proprietary information in public places such as restaurants, public transport, elevators, pavements or aeroplanes;
- posting content/comments to social networking sites, blogs, forums or in private emails or text messages;
- talking about it in public;
- working with sensitive material in public, such as working on mobile devices whilst in public places such as restaurants, public transports and aeroplanes; and
- transmitting such information by unsecured means.

Your obligation to protect Molycop's confidential and proprietary information continues even after you leave Molycop.

Just as Molycop values and protects its own confidential and proprietary information, it is our policy and practice to respect the confidential and proprietary information of third parties with whom Molycop has agreed to treat such information in confidence. Molycop also values and protects the personal information of current and former employees.

Fraud, bribery, corruption, sanctions, modern slavery and human trafficking

See also the Molycop Fraud and Corruption Policy, the Molycop Whistleblower Policy and the Molycop Third Party Due Diligence Policy and Procedure.

Fraud, bribery and corruption

Molycop does not tolerate fraud and corruption. All actual or suspected fraud should be referred to the Finance team or your manager for investigation. Where genuine fraud or other criminal activity is genuinely suspected, Molycop will alert and work with police and seek to press charges. Perpetrators will be subject to suspension, dismissal and civil action to recover any financial loss caused to Molycop.

Dishonest activity involving deception which results in actual or potential financial loss, whether to Molycop or other parties, amounts to fraud. Dishonest activity involving a misuse of a position within Molycop, including to achieve personal gain for you or another person or entity (including a Molycop entity) amounts to corruption.

Involvement in fraud, bribery and/or corruption is a criminal offence and threatens the reputation of Molycop and represents a fundamental risk to our brand and business. If the only way to win business requires paying a bribe or otherwise breaching this Code, Molycop does not want the business.

Molycop employees and contractors must not offer, promise, authorise or provide anything of value to any public official in order to influence the official for the purpose of obtaining or retaining any contract, licence, permit or other business advantage for Molycop. Likewise, employees or contractors must not offer any benefit to a third person (such as a relative or business partner of the public official) with the intention of influencing the official. Public officials may include, but are not limited to:

- employees or contractors of companies wholly or majority owned by a government;
- a person in the service of a governmental body including a member of the military or the police force;
- a politician, judge or member of the legislature of a country;
- an employee, contractor or person otherwise in the service of a public international organisation; or
- an individual who is or who holds himself or herself out to be an authorised intermediary of a public official.

Molycop employees and contractors must not offer, promise, authorise or pay anything of value to any person who works for or represents any of Molycop's current or potential customers or suppliers to influence that person to perform their function improperly or reward them for doing so.

Molycop employees and contractors also must not offer or provide a benefit or "secret commission" to any agent or representative of another person or company in order to obtain a business advantage for Moly-Cop where the agent or representative intends to conceal their receipt of that benefit.

Molycop employees and contractors must not request or accept for themselves or their relatives anything of value from any person who works for, or represents a supplier, competitor or any other entity to influence Molycop to give business to that party, or to any other party. Refer also to the **gifts and entertainment** section below.

Molycop or its employees could also commit other criminal offences if they are involved in receiving or concealing the receipt of profits earned by paying bribes or other things of value, or in concealing the nature or recipient of a bribe or other benefit in Company financials and records.

Modern slavery and human trafficking

Molycop does not tolerate and will not knowingly participate in any activity involving modern slavery or human trafficking.

Molycop is committed to conducting business ethically and with integrity and ensuring that there is no slavery or human trafficking in any part of its business.

Sanctions

Molycop and/or its employees can be held liable if Molycop engages directly or indirectly in certain transactions with nominated third parties which are subject to sanctions and other measures issued by governmental authorities.

Molycop is committed to conducting business in compliance with all applicable sanctions laws.

Molycop can be liable under anti-corruption laws, sanctions laws and modern slavery and human trafficking laws for the actions of third parties acting on its behalf, including but not limited to agents, distributors, consultants, suppliers and other contractors, particularly where they are affiliated to or otherwise provide a benefit to a foreign public official or where they otherwise breach anti-bribery laws or modern slavery or human trafficking laws.

Third party due diligence

Employees must therefore conduct appropriate background and reputation checks in accordance with the Third Party Due Diligence Policy and Procedure before selecting or commencing negotiations with any agent, distributor, consultant, supplier, customer or other contractor outside their country's jurisdiction.

Any breach or suspected breach of this section of the Code, or any concerns regarding a proposed agent or contractor should be immediately reported to your manager and to the Chief Legal Officer.

Speak Up contacts

Molycop expects employees who become aware of improper conduct to raise those concerns. Molycop's Fraud and Corruption Policy and Whistleblower Policy contain the contact details of Molycop's independent and anonymous toll free hotlines and email address.

Conflicts of interest

The accepted standard in business and under this Code, is that all business decisions are at "arm's length" and impartial. A conflict of interest is a situation where an individual stands to benefit, directly or indirectly, as a result of a decision they make on behalf of Molycop.

That is, a conflict of interest exists where it can be argued that a person's capacity to make a proper and impartial decision is compromised.

For managers and employees at all levels, the potential for conflict of interest is a business reality. For example: whether to employ a friend or family member even though you believe they are the best candidate; whether to purchase a product or service where, it can be argued, there is some personal benefit; or whether to enter into a business arrangement with a person or entity with which you are not fully at arm's length.

Whilst avoidance is always preferable, often the issue is less about whether a conflict of interest exists, but how individuals deal with such situations. Molycop's expectation is that employees recognise and immediately disclose to their manager any situation or decision that involves, or could be perceived by others to involve, a conflict of interest. This will protect the employee as well as Molycop.

If in doubt, contact Senior Management or the Chief Legal Officer.

In the case of Molycop's directors and Senior Management, it should be noted that specific disclosure or approval requirements might arise with regard to conflict of interest situations under country legislation in which Molycop operates, and other policy or governance documents and related party disclosures in Molycop's financials and records.

Copyrighted materials and trademarks

Many materials used in the course of work are protected by copyright laws such as computer software, audio and video tapes, trade journals, books and magazines. Presentation slides, training materials, management models, or other materials prepared by outside consultants or organisations may also be copyrighted. You should not reproduce, distribute, or alter copyrighted materials owned by others without valid permission of the copyright owner or its authorised agent. As it is not always easy to determine if such permission exists, you must obtain such permission before using these materials.

Molycop's trademarks, service marks, logos and marketing slogans are also valuable assets, which must be protected. Employees should ensure these proprietary marks are used properly and only for legitimate business purposes of Molycop.

If in doubt about how Molycop's proprietary marks can be used, contact the Chief Legal Officer.

Fair Trading Policy

See also the Molycop Fair Trading Policy.

Molycop is committed to a pro-competitive culture and compliance with the competition, anti-trust and trade practices laws of all countries in which it operates or conducts business. Compliance with these laws also promotes ethical standards and a commitment to free and fair competition. Specifically:

- conduct that is prohibited by competition, anti-trust or trade practices laws must be avoided. Where the impact of the law is uncertain, employees must seek appropriate legal advice from the Chief Legal Officer and act on an informed judgment;
- no employee has authority to contravene this policy or to authorise or condone contravention by others. Contravention cannot be justified by claims of ignorance, good intentions or failure to seek legal advice and will be regarded as a serious breach of your responsibilities and duties as an employee;
- Molycop will continue to conduct employee education and compliance programs on a regular basis to help ensure the success of this policy;
- any employee becoming aware of a breach or potential breach of competition, anti-trust or trade practices laws should report their concerns to the Chief Legal Officer; and
- Molycop intends to promote a co-operative relationship with other relevant regulatory agencies in countries where it operates.

Privacy

See also the Molycop Privacy Policy.

Molycop is committed to protecting the privacy of individuals' personal information by complying with relevant legislation in countries where it operates.

All customer or supplier information must be managed in a professional and ethical manner with regard to use and distribution of internal records. If customer or supplier records contain information of a personal nature, that information must not be used for any other purpose or disclosed outside the organisation without the permission of the customer or supplier or the individual concerned unless required to be provided by law.

The following guidelines should be adhered to:

- only collect personal information if it is necessary for your business activities and only by lawful and fair means;
- use personal information only for business purposes relevant to Molycop's relationship with the individual;
- only disclose personal information as advised in Molycop's Privacy Policy;
- protect personal information received;
- de-identify personal information where necessary or appropriate;
- allow individuals to access and correct their personal information where appropriate;
- be aware of the Molycop Privacy Policy; and
- do not collect sensitive information without appropriate consent.

Personal information is information or an opinion about an individual whose identity is apparent or can reasonably be ascertained from the information or opinion. Generally, an individual's name will have to be on the relevant record before it might be categorised as personal. However, in some circumstances other details may be sufficient to ascertain an individual's identity, e.g. email address, job title in some circumstances.

Any breach or suspected breach of this section of the Code, or any concerns or doubts about compliance with this section of the Code should be immediately reported to the Chief Legal Officer.

Gifts and entertainment

See also the Molycop Corporate Credit Card, Travel and Entertainment Policy.

Employees must exercise care with respect to giving or receiving business related gifts. This applies to direct payments and to payments in kind, including the provision of goods or services, personal favours and entertainment such as meals, travel and tickets to events.

Accepting or offering gifts of moderate²² value is acceptable in situations where it is legal and in accordance with normal business practice such as where the exchange of gifts is customary and the gifts are appropriate for the occasion.

However, employees must not give or accept gifts of any kind in circumstances that could be reasonably regarded as unduly or improperly influencing the recipient or creating a business obligation on the part of the recipient. In particular, gifts should not be given in circumstances that could in any way be seen as an attempt to gain influence in respect of any particular matter to the advantage of Molycop or to speed up an approval, consent or other administrative process. If there is any doubt, the situation should be referred to your manager, your local human resources contact or the Chief Legal Officer. Refer also to the **fraud, bribery, corruption, modern slavery and human trafficking** section above.

At a practical level, individuals should not give or receive gifts such that they would feel embarrassment or guilt if such giving or receiving was to become known to others, or that they would feel is not appropriate for their direct report or their peer to receive.

The requirement or golden rule is disclosure. Ensuring your manager or supervisor is aware of all gifts that may be considered inappropriate or significant ensures transparency and seeks to avoid any suggestion of a conflict of interest.

Your manager or supervisor must approve gifts that would reasonably be considered to be ostentatious or expensive. Similarly, if an employee receives a gift (regardless of value), they should consult their manager or supervisor for a decision on whether it should be kept, handed to Molycop or returned.

The monetary value of the gift and legal requirements should be considered when determining whether a gift should be retained by an employee, handed to Molycop or returned. If it is determined that a gift should be handed to Molycop, the gift should be donated to a nominated charity or made available to all employees in the business unit or Region. The course of action will depend on the type of gift received.

The following items must not be given or accepted under any circumstances, regardless of their value: cash or personal cheques; drugs or other controlled substances; product or service discounts that are not available to all employees; personal use of accommodation or transportation; and payments or loans to be used toward the purchase of personal property.

Under no circumstances should an employee request a gift of any kind from a supplier, customer, or other party with whom Molycop conducts or is likely to conduct business. In addition, employees must not exchange gifts with representatives of Molycop's competitors, since the provision or receipt of such gifts may create an actual or perceived conflict of interest. This policy also applies to employees' immediate family members and to any agents or third parties that are employed to represent Molycop.

²² As a guideline, moderate is circa USD\$100 or equivalent value or less. Adjust giving respect to different economic and currency considerations in each country.

Outside appointments

Employees must seek approval from Senior Management before accepting a directorship in another business corporation, statutory authority or similar body. Each case will be considered on its merits.

Approval is required for positions in government advisory bodies; political parties; professional institutions; trade associations; charitable, public, social, or sporting organisations; and similar groups if the position:

- has senior or high status;
- will involve a significant amount of the employee's time to the extent that it could affect their ability to fulfil their responsibilities to Molycop;
- is likely to involve public controversy; or
- will involve activities or features that are or could be incompatible with Molycop's policies or standards.

Employees should obtain approval before accepting any significant payment for their involvement with an advisory board or similar group, including reimbursement for travel and related expenses. Whenever an employee participates in an outside activity, it is their responsibility to ensure that any opinions they express are clearly their personal views and cannot be interpreted as the views of Molycop.

Full-time employees should not take additional employment with outside organisations or operate their own business and they must seek approval before doing so.

Any employee whose situation may require approval should inform their manager or supervisor. Where necessary, requests for approval should be referred to the CEO or the relevant CEO Direct Report. The Chief Legal Officer should be advised of the appointment along with the approval provided.

SECTION 2: Health, safety and environment

Occupational health, safety, welfare and wellbeing

See also the Molycop Safety Principles, the Molycop Work Health and Safety Policy and the Molycop Fitness for Work Policy.

Molycop is committed to achieving the highest performance in occupational health, safety, welfare and wellbeing with the aim of creating and maintaining a safe and healthy working environment throughout its businesses. Consistent with this, Molycop will:

- seek continuous improvement in its occupational health and safety performance taking into account evolving community expectations, management practices, scientific knowledge and technology;
- comply with all applicable laws, regulations and standards and where adequate laws do not exist, adopt and apply standards that reflect Molycop's commitment to occupational health and safety;
- involve employees and contractors in the improvement of occupational health and safety performance;
- train and hold individual employees accountable for their area of responsibility;
- avoid, manage and mitigate risk by implementing management systems to identify, assess, monitor and control hazards and by reviewing performance;
- ensure that Molycop employees, contractors and visitors are informed of and understand their obligations;
- communicate openly with employees, government and the community on occupational health and safety issues;
- contribute to the development of relevant occupational health and safety policy, legislation and regulations; and
- support relevant occupational health and safety research.

Alcohol, drugs and tobacco

See also the Molycop Safety Principles, the Molycop Work Health and Safety Policy and the Molycop Fitness for Work Policy.

Molycop recognises that circumstances vary among different cultures and countries regarding the use of alcohol, drugs, and tobacco. However, despite these differences, every employee is responsible for taking appropriate steps to prevent workplace injuries and illnesses and for contributing to a safe and healthy work environment. This obligation includes responsible behaviour with respect to the use of alcohol, drugs, and tobacco at work, when conducting company business and at Molycop sponsored activities.

Employees must not be impaired by illegal or legal drugs, including alcohol, while at work or when conducting company business. Under Molycop's various fit for work programs, compliance with these requirements may be assessed at a range of times or situations.

Poor work performance caused by alcohol or drug use, or significant impairment that creates a safety risk, is regarded as a serious misconduct. In addition, Molycop prohibits the possession, transfer or use of illegal substances on Molycop premises or sites, in conjunction with company business, at company functions or company sponsored activities.

To prevent passive cigarette smoke exposure, all Molycop buildings and sites will ideally have designated smoking and non-smoking areas. Smoking is prohibited in all shared work areas and in other communal areas such as conference rooms, dining facilities, reception areas, and first aid rooms. Smoking is prohibited in buildings or offices that use a recycling air conditioning system, Molycop vehicles carrying non-smoking passengers and places in which smoking creates a significant fire risk.

If smoking areas are provided, they should be separate from adjacent work areas, clearly marked, adequately ventilated and reasonably convenient. Smoke should be prevented from entering a recycled air conditioning system and non-smokers should not be exposed to passive cigarette smoke.

Environment

See also the Molycop Environment Policy, Climate Change Policy and Community Policy.

It is Molycop's approach to achieve a high standard of environmental care by complying with relevant legislation and seeking continuous improvement in performance by taking account of evolving scientific knowledge and community expectations.

Specifically, Molycop's approach is to:

- comply with all applicable laws, regulations and standards;
- communicate with government and the community on environmental issues, and contribute to the development of policies, legislation and regulations that may affect Molycop;
- ensure that its employees and suppliers of goods and services are informed of Molycop's approach and are aware of their environmental responsibilities in relation to Molycop's business; and
- ensure that management systems identify, control, mitigate and monitor environmental risks arising from operations.

SECTION 3: Human resources

Molycop is committed to maintaining an efficient, skilled, diverse, flexible and committed workforce through contemporary employment practices and arrangements.

While most employees will be engaged on a full-time permanent basis, a range of suitable alternatives are available, to meet specific business requirements.

Recruitment and Selection

See also the Molycop Diversity Policy.

Molycop recognises that people are a distinguishing feature of a successful business and is committed to maintaining and building an appropriately skilled, motivated and diverse workforce.

Molycop will select the most appropriate person for the position and will not compromise its selection criteria or processes. Molycop's selection processes will:

- be thorough, consistent and efficient;
- be (and appear to be) fair, valid, impartial and non-discriminatory;
- assess merit against specific and multi-dimensional criteria (relevant and demonstrable knowledge, skills, qualifications, experience and operating style);
- ensure applicants are provided with sufficient information to understand the business, the requirements of the position, and the selection criteria to be applied; and
- respect privacy and confidentiality.

Managing diversity, harassment and bullying in the workplace

See also the Molycop Diversity Policy and the Molycop Whistleblower Policy.

Molycop is committed to maintaining a diverse workplace free of unlawful discrimination, harassment and bullying. Molycop is committed to ensuring that:

- all employment decisions are fair, reasonable, and based on merit;
- no individual or group is treated less favourably than another for reasons not immediately relevant to the circumstances;
- employees, visitors and others in the workplace are treated with respect in an environment free of unlawful discrimination, harassment, bullying and offensive behaviour;
- the display, storage or transmission of material likely to cause offence will not be permitted on Molycop premises or equipment;
- employees at every level understand their rights and responsibilities with respect to discrimination, harassment and bullying;
- complaints of unlawful discrimination, harassment and/or bullying are taken seriously and are appropriately and promptly investigated;
- legislative standards are met with respect to equal employment opportunity (EEO) and the management of diversity, harassment and bullying in the workplace; and
- individuals are not prevented from working safely and effectively on the basis of their level of literacy.

Molycop is committed to training and educating employees, managers and supervisors to be able to recognise and deal with instances of discrimination, harassment and bullying in the workplace, as well as to promote harmony and equality in the workplace.

It is the responsibility of managers and supervisors to ensure that all workplace decisions and activities are free of unlawful discrimination, harassment and bullying and to appropriately investigate all complaints or suspected instances of unlawful discrimination, harassment or bullying.

Molycop considers any breach to be misconduct. If, after investigation, allegations of harassment are substantiated, Molycop will implement appropriate disciplinary action against those responsible, up to and including dismissal.

SECTION 4: Molycop information and external relationships

Information systems and technology

See also the Molycop Acceptable Use of Information Systems Policy.

Molycop employees use a wide range of information systems and technology to conduct business including smart and mobile phones, voicemail, facsimile, the internet, electronic mail and other devices.

Access to, and use of, these systems is subject to the Molycop Acceptable Use of Information Systems Policy and related policies, as amended from time to time.

The principles underpinning these policies include:

- Molycop provides email services and access to the internet for legitimate business purposes. In some cases, third parties (other companies) may also provide Molycop employees with access to their systems and equipment for specific business purposes. The use of these and other systems for non-Molycop business represents a threat to system efficiency and security
- all company information is the property of Molycop and as such must be treated as any other asset of Molycop. Every employee has a responsibility to protect such information communicated or stored on all electronic devices from accidental and unauthorised access, disclosure, modification or deletion
- except in the course of an employee's duties or with the express permission of their manager or supervisor, employees must not use company computer, email, intranet and internet systems and networks or other devices:
 - using another person's user name and password;
 - for personal commercial purposes;
 - for regular (daily) share trading and monitoring;
 - to send unsolicited bulk email, to transmit chain letters or for mass mailing (spamming) to run non-Molycop instant messaging software;
 - to harass, abuse, or defame any person;
 - to receive and/or transmit pornography, profanity or other offensive material;
 - for gambling purposes;
 - to play on-line or network games;
 - to obtain, possess or transmit illegal or pirated material;
 - to obtain, possess or transmit confidential or proprietary information without authorisation;
 - for disseminating personal contact information of officers or employees of Molycop without their consent;
 - for any other illegal purpose;
 - in a way that knowingly causes interference with or disruption to any network, information service, equipment or any user thereof;
 - to knowingly download software or media files or data streams that will create a security risk or use a greater amount of network bandwidth than is appropriate; or
 - to do anything else which will or may bring Molycop into disrepute; cause Molycop or any of its customers, suppliers or other associates to bear unreasonable risks or costs; cause disruption to any of Molycop's business or services or be in breach of any privacy obligations;
- Molycop takes cyber security very seriously and you play a vital component of its success. Therefore, employees must continuously practice good cyber-aware behavior including:
 - completing all requested cybersecurity training in a timely manner
 - reporting suspicious behavior and suspected cyber security breach or compromise to any Molycop IT employee immediately
 - if working remotely, ensuring compliance with all facets of the Molycop Remote Work Policy.
- Molycop reserves the right to monitor use of its information systems and technology. This includes monitoring the nature and content and restricting the transfer of certain material to or from employees.

Relationships with government

See also the Molycop Fraud and Corruption Policy.

Wherever Molycop conducts business, it respects the authority of government. Molycop will maintain honest relationships with governments, their agencies, officials, and personnel.

Molycop regularly shares information and opinions with government on issues that affect Molycop. The exchange of information and opinions is essential to informed decision making by both government officials and Molycop.

Employees who provide information to governments on behalf of Molycop must ensure that all information is accurate and complete. Errors or omissions may be construed as a violation of a law or regulation and might damage Molycop's credibility and reputation. Employees who lobby on behalf of Molycop or represent Molycop in government matters must comply with all applicable laws and regulations relating to corporate participation in public affairs.

Political contributions and activities

Molycop maintains a position of impartiality with respect to party politics. Accordingly, Molycop does not contribute funds to any political party, politician or candidate for elected public office in any country.

Molycop may contribute to the public debate of policy issues that affect it. For example, Molycop might discuss relevant issues with government officials or provide written advice about the likely impact of proposed policies on Molycop. At times, attendance at events hosted by a political party may be required for briefing purposes. Your manager must be consulted if there is any doubt about whether attendance at a function would compromise Molycop's impartiality.



Jim Anderson

Chief Executive Officer
August 2023



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