



WESTGOLD RESOURCES LIMITED

(ABN 60 009 260 306)

CODE OF CONDUCT

ADOPTED BY THE BOARD ON 23 NOVEMBER 2023



WESTGOLD RESOURCES LIMITED - CODE OF CONDUCT

Our Code of Conduct (**the Code**) articulates Westgold Resources Limited's and its subsidiaries' (collectively, **Westgold** or the **Company**) values and sets expectations around behaviours to ensure we conduct our business with integrity, behave in a way that is aligned with our values, and positively impacts our broader community and environment.

The purpose of this Code is to guide the behaviour of everyone at Westgold including all employees, contractors, consultants, managers, company agents and the Board, as well as temporary employees, individual contractors and directors of Westgold (collectively, **Employees**) by clearly stating Westgold's firm corporate commitments and expectations.

This Code reinforces and works in conjunction with other relevant policies of Westgold including, but not limited to, the Anti-Bribery and Anti-Corruption Policy, Diversity Policy, Equal Employment Opportunity Policy and Health and Safety Policy (see the full list of policies [here](#)).

All employees are required to understand and comply with their obligations under this Code and associated Westgold Policies. A breach of this Code may result in disciplinary action including termination of employment or engagement.

This Code, with full endorsement of Westgold's Board of Directors (**Board**), demonstrates Westgold's commitment to upholding an environment where we live our values, are clear around expectations, and conduct business honestly, ethically and fairly, in strict compliance with all laws and regulations.

If you have a question about this Code or its application, please speak to your manager, a People representative, Group General Counsel or Company Secretary.

This Code is available in the Corporate Governance section of Westgold's website (www.westgold.com.au).

Wayne Bramwell
Managing Director



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1.0 HOW WE WORK

OUR CORE VALUES AND BEHAVIOURS

Our values and behaviours guide how we work with each other, our communities, and stakeholders. They influence our actions and decisions, hold us accountable and ultimately determine our success.

Westgold’s Core Values are:



CHOOSE SAFETY



SHOW RESPECT



DELIVER VALUE

All employees are required to uphold the Westgold Core Values, and role model associated behaviours at all times. This helps ensure we have a consistent standard of behaviour across worksites, and a shared understanding around what is important to our business.

Some example behaviours related to our Core Values are provided below.

CORE VALUE	CHOOSE SAFETY	SHOW RESPECT	DELIVER VALUE
VALUE STATEMENTS	<p>Think safety and act safely.</p> <p>Look out for each other.</p> <p>Protect our environment.</p>	<p>Appreciate everyone for who they are.</p> <p>Enable everyone to do a great job.</p> <p>Grow strong teams and communities.</p>	<p>Plan to succeed as a team.</p> <p>Execute with excellence.</p> <p>Rise to the challenge and keep on improving.</p>
Keep it Green Behaviours	<p>We put safety first, every day.</p> <p>We stop the job if it isn't safe.</p> <p>We report, investigate, and learn together.</p> <p>We minimize impact on our natural resources.</p>	<p>We treat people how they expect to be treated.</p> <p>We actively seek input from others.</p> <p>We regularly give and receive feedback.</p> <p>We ensure stakeholders have a voice.</p>	<p>We share, learn and replicate from others.</p> <p>We keep things simple and deliver results.</p> <p>We are constructive and offer solutions.</p> <p>We are positive, curious and find better ways.</p>
Eliminate the Red Behaviours	<p>Putting production before safety.</p> <p>Continuing to work despite unsafe conditions.</p> <p>Covering up issues and not learning from incidents.</p> <p>We utilize more natural resources than we need.</p>	<p>Inappropriate or disrespectful behaviour.</p> <p>Not seeking or considering diverse perspectives.</p> <p>Acting defensively when feedback is provided.</p> <p>Engaging stakeholders post decision.</p>	<p>Working in silos, throwing others under the bus</p> <p>Achieving results regardless of cost to team</p> <p>Pointing out problems and not providing solutions</p> <p>Being negative, inflexible and reluctant to change</p>



KEEPING OUR EMPLOYEES SAFE

The safety of our employees is our highest priority.

Westgold provides employees with a safe work environment, where hazards are identified, control measures implemented, and operations actively monitored. We believe no injury or harm to health is considered acceptable, and all activities are to be undertaken without compromising health and safety.

Detailed management systems and plans exist on all sites to support a safe work environment. The Fitness for Work, Injury Management, Risk Management and Health and Safety Policies articulate Westgold's commitment to safety and must be understood and executed by all employees across our business.

FAIR TREATMENT

Westgold is committed to the fair and equal treatment of all employees and abides by the employment and human rights laws of the countries in which it operates. Westgold has adopted business practices that are consistent with our values to promote and uphold the rights and dignity of all people.

Employment decisions are based on merit, and employees and candidates for employment will be judged on the basis of their capabilities and qualifications to carry out their job without regard to race, gender, religion, sexual orientation, disability, age, marital status, political belief, or any other attribute or status protected by law.

Westgold does not tolerate discrimination, bullying, harassment or victimisation, and will not tolerate any conduct which results in a hostile workplace environment. Employees must adhere to all Westgold policies relating to the treatment of others including the Diversity Policy, Equal Employment Opportunity Policy and Human Rights Policy.

2.0 HOW WE DO BUSINESS

EMPLOYEE RESPONSIBILITIES

Every employee is responsible for complying with this Code both in detail and in spirit.

Everyone must:

- act in accordance with Westgold's Core Values.
- act with integrity – being honest, ethical, fair, and trustworthy in all business dealings and relationships.
- conduct themselves in accordance with the Code when using social media, particularly where your social media use could affect Westgold.
- comply with all laws and regulations that apply to Westgold and its operations and avoid any illegal or unethical activity.
- avoid conflicts between Westgold's interests and personal interests.
- treat others with respect and not engage in bullying, harassment, discrimination or other forms of detrimental conduct.
- deal with customers and suppliers fairly.
- protect Westgold's business assets.



- not take advantage of the property or information of Westgold or its customers for personal gain or to cause detriment to Westgold or its customers.
- not take advantage of their position or the opportunities arising from their position for personal gain; and
- report breaches of this Code to an appropriate person if required.

Westgold will only conduct business by lawful and ethical means. Legal responsibilities change and employees at all levels must keep themselves informed and comply with all applicable legal responsibilities.

Depending on their individual responsibilities, employees must be familiar with corporate, competition and consumer, taxation, employment, work health and safety, equal opportunity and discrimination, privacy and environmental laws and regulations as well as any of Westgold's internal policies in relation to such matters.

All employees have an obligation to understand and work within these requirements. If employees do not understand their responsibilities and Westgold's obligations, they must seek guidance from their manager or People team representative.

AVOIDING CONFLICTS OF INTEREST

Employees must avoid any situations involving divided loyalty or a conflict between their personal interests and those of Westgold (unless prior written consent has been provided based on full disclosure). Employees faced with conflicting interests must report it to their manager, who will escalate to the Group General Counsel if required.

In particular, Employees:

- and any organisation in which they or their family have a significant interest must not compete with or have business dealings with Westgold.
- must not work or consult for, or have any other key role in, an outside business organisation which has dealings with Westgold or is a competitor of Westgold.
- must not enter into any arrangement or participate in any activity that conflicts with Westgold's best interests or is likely to negatively affect Westgold's reputation.
- must not use Westgold's assets for any purpose other than for Westgold's business purposes or interests.
- must not make improper use of their employment or engagement with Westgold, their position or role in or for Westgold, or information obtained because of their position, to gain an advantage for themselves or anyone else, to Westgold's detriment; and
- must not buy or sell shares in Westgold or any other companies at any time when they are aware of price sensitive information about Westgold, which has not been disclosed to the Australian Securities Exchange (ASX). All employees must read and follow the Westgold Securities Trading Policy.



3.0 PROTECTING OUR BUSINESS

PROTECTION AND PROPER USE OF WESTGOLD'S ASSETS

Employees shall endeavour to protect Westgold's assets and other resources including plant, equipment, and other valuable property including confidential information and intellectual property such as trademarks, registered designs, and copyrighted material, from loss, theft and unauthorised use.

Employees are to use Westgold's materials and facilities for work related purposes only, and the removal or borrowing of company property is only allowed with express permission. Incidental personal use of such company resources as computers, phones, faxes, photo copiers and internet access are permitted in accordance with Westgold's IT policies.

PROTECTING CONFIDENTIAL INFORMATION

Information that Westgold considers private and that is not generally available outside Westgold, which may include information of third parties to which Westgold has access (**Confidential Information**) and information that Westgold owns, develops, pays to have developed or to which it has an exclusive right (**Proprietary Information**) must be treated by Employees as follows:

- Employees must ensure that they do not disclose any confidential information or proprietary information to any third party or other employee who does not have a valid business reason for receiving that information, unless:
 - allowed or required under relevant laws or regulation; or
 - agreed by the person or organisation whose information it is.
- If confidential information or proprietary information is required to be provided to third parties or other employees for valid business purposes, employees must:
 - take adequate precautions to seek to ensure that information is only used for those purposes for which it is provided, and it is not misused or disseminated to Westgold's detriment; and
 - take steps to ensure that the information is returned or destroyed when the purpose is complete.

These obligations continue to apply to employees after their employment or engagement ceases. If you are unsure whether information is of a confidential or proprietary nature, seek advice from your manager before disclosure.

Employees must follow all cyber and other security requirements related to the protection and handling of confidential data and information and make efforts to ensure sensitive data is managed and communicated appropriately.

ANTI-BRIBERY AND ANTI-CORRUPTION

Bribery, corruption and other dishonest or improper conduct are serious criminal offences. Bribery and corruption undermine legitimate business activities, distort competition and expose Westgold and its employees to significant risks. We are committed to conducting business with integrity which means we comply with all relevant laws.

Employees are not permitted to give or take bribes, kickbacks or gratuities or any other payments or promises for favourable treatment or as an inducement for doing business. The acceptance of token gifts and entertainment are acceptable provided they are appropriate to the intended business purpose and consistent with local business practice and laws.



Employees should not seek to gain special advantage for Westgold or themselves through the use of business gifts, favours or entertainment, if it could create even the appearance or perception of impropriety. Business entertainment should be moderately scaled and clearly for business purposes. Gifts and entertainment should not be offered to a customer or supplier whose organisation does not allow this.

Employees may accept or give gifts, favours, or entertainment only if permitted to do so by Westgold's Anti-Bribery and Anti-Corruption Policy which outlines Westgold's policies relating to gifts, favours, and entertainment.

If Employees have any doubts about whether a gift or benefit complies with this Code or Westgold's Anti-Bribery and Corruption Policy, they should promptly discuss it with their manager.

4.0 OUR COMMUNITY AND EXTERNAL STAKEHOLDERS

ENVIRONMENT

Westgold has an obligation to maintain environmental compliance, and conduct activities in an environmentally and socially responsible manner. Westgold is committed to effectively measuring and continuously improving our environmental performance and minimising any adverse environmental impacts associated with our operations through the efficient use of natural resources, and the responsible management of land and biodiversity.

We are committed to providing all employees with resources to establish and reinforce behaviours that support positive environmental and community outcomes, and embed ways of working to ensure we continue to uphold our obligations and minimise any adverse impacts to our environment.

More information is available at our Environment and Community Policy.

WORKING WITH SUPPLIERS

Westgold understands the potential for human rights risks in our supply chains and has adopted practices and ways of working to consider and mitigate risks. As a purchaser of goods and services, we strive to respect human rights and share our commitment to high ethical standards and seek to make contractual arrangements with suppliers that promote the principles contained in our Human Rights Policy and Supplier Charter.

Further information can be found in our Modern Slavery Statement.

COMMITMENT TO INDIGENOUS EMPLOYMENT

Westgold is committed to providing opportunities to Indigenous people and endeavours to establish programs which address barriers to employment, which include training, education and business opportunities. Westgold also requires its contractors, suppliers, and business partners to support these efforts to end Indigenous disparity through the provision of skills, employment and business opportunities.

Westgold builds meaningful connections with the communities in which it works, based on open, transparent, continuous, and inclusive communication.

PUBLIC COMMUNICATIONS AND DISCLOSURES

Westgold manages all external communications made on the Company's behalf and by its employees. It does so to protect the interests of shareholders, employees and customers to



ensure Westgold's brand and reputation are consistent and in line with its corporate strategy, vision and values.

In accordance with our Disclosure Policy, Westgold's authorised personnel will respond to questions from external stakeholders and issue official announcements. Please direct any external requests for disclosure to the appropriate person. Unless the Managing Director has given prior written consent, employees and associated parties must not participate in public forum communications or discussions (including internet-based forums and social media) where the subject matter is related to Westgold, its competitors or any industry in which Westgold operates.

Westgold has adopted the Disclosure Policy as a means of ensuring compliance with its disclosure and communication obligations under the *Corporations Act 2001 (Cth)* and the ASX Listing Rules. The aim of the Disclosure Policy is to keep the market fully informed of information that may have a material effect on the price or value of Westgold's securities, and to correct any material mistake or misinformation in the market. The Disclosure Policy, as amended from time to time, is available in the Corporate Governance section of Westgold's website.

Employees should ensure that they are aware of the requirements of the Disclosure Policy and, if it applies to them, they must act in accordance with the policy.

5.0 SPEAKING UP

Any Employee who knows or suspects on reasonable grounds a breach of this Code either has occurred, is occurring or might occur should report that information to:

- an officer or senior manager of Westgold.
- a senior member of the People team; or
- an authorised recipient in accordance with Westgold's Whistleblower Policy.

Such reports will be treated confidentially to the extent possible consistent with Westgold's obligation to deal with the matter openly and according to applicable laws.

No employee will be subject to retaliation or victimisation for reporting a possible violation of this Code and will be protected under Westgold's Whistleblower Policy.

6.0 NON-COMPLIANCE

All employees must adhere to this Code and Westgold's policies.

Breach of this Code may constitute misconduct and be subject to disciplinary action up to, and including, termination of employment or engagement.