



Purpose

KGL's Code of Conduct outlines what is expected of everyone who works for us regarding our responsibilities to shareholders, employees, customers, suppliers, consumers and the broader community.

The Code of Conduct applies to everyone who works for KGL – directors, officers, employees and contractors – and covers business activities with all stakeholders in Australia and overseas.

The Code of Conduct should be read in conjunction with KGL's policies and procedures and other relevant documents including employment contracts.

Standards Expected

Comply with the Law

You are:

- expected to comply with all applicable laws and regulations,
- encouraged to keep abreast of legal and industry developments that may impact your work activities, and
- expected to understand KGL's policies, standards and procedures relevant to your area of work. If you are concerned about a particular law, regulation, policy, standard or procedure, please contact your manager.

Protect KGL's Interests

You must conduct yourself with honesty and integrity, avoiding actions that may compromise KGL's interests, reputation or objectives.

Conflict of Interest

You must conduct all business transactions in the best interests of KGL, and for a proper purpose. Actual, potential or perceived conflicts of interest that may arise from time to time, for example private interests that could influence or be seen to influence your work decisions or actions, must be reported to your manager and the CFO immediately. A conflict of interest occurs when you compete against KGL in a business activity or divert business from KGL, or allow any interest, activity or influence outside of KGL to influence your judgement when acting on behalf of KGL. Some examples include, directing KGL business to a supplier owned or managed by a relative, related party or friend, using KGL equipment for personal use or to assist an outside business, working on KGL property or in KGL time for anyone other than KGL, unless authorised to do so.

Use of Knowledge and information

The security and proper use of customer and company information is mandatory. You must not improperly use knowledge, information, documents or other company resources. Information about KGL, its customers and employees must be respected, protected and confidentially maintained at all times. If you have access to information about KGL and other related organisations that is confidential or not publicly available, you must not use it for private gain or someone else's gain. Shares in KGL or other related organisations must not be bought or sold by anyone who holds confidential or inside information, as it could affect the share price of KGL and/or the share price of the related organisations. You must comply with KGL's [Securities Trading Policy](#).



Code of Conduct

You must respect the privacy of information and not disclose or misuse confidential or inside information, even after you stop working for KGL.

Respect of KGL Property

All KGL assets and property must only be used for the benefit of KGL. You are responsible for protecting any KGL assets under your control. You must not steal, misappropriate or misuse KGL assets, including, but not limited to, cash, securities, property, intellectual property or confidential information, and you must not assist others to do so. Refer KGL's [Credit Card Policy](#).

Gifts, Entertainment and Gratuities

You must not seek, accept, provide, offer or cause to be provided with gratuities (for example, bribes, kickbacks, gifts, entertainment, payments or any other benefit) beyond those which are considered legitimate business practices. As a general rule, do not accept or offer gratuities that could be perceived as a reward for preferential treatment or creating a business obligation. If you accept something that could be seen as improper, please report it immediately to your manager. You can accept gifts of low value and entertainment only after approval has been obtained. These must be appropriate in the circumstances, must not have the potential to embarrass KGL, and must be consistent with local customs and traditions. If a contract is being negotiated or tendered, you must not accept any invitations for events or gifts from any existing or potential vendors or service providers, until following the formal awarding of a contract. Under no circumstance can you make facilitation payments (for example, minor payments to secure or expedite a routine Government action). This is in line with the anti-corruption laws of various countries and every effort should be made to resist such payments. If you have any concerns about acceptance or offering of gratuities, or requests for facilitation payments, please speak with your manager, who will refer it to the CFO if necessary.

Professional Behaviour and Fair Dealing

KGL is against all forms of intimidation, discrimination and harassment. We are committed to equal opportunity, personal rights and freedom in all aspects of our operations. You must maintain professional conduct when interacting with your colleagues and when you are representing KGL. During these interactions, you must conduct yourself with integrity, fairness and in compliance with the laws applicable to behaviour in that environment. Be mindful of the social ramifications of your actions, be aware of the local culture and behave accordingly. Refer KGL's policies on [Diversity and Inclusiveness](#) and [Bullying and Harassment](#).

Safety, Health and Wellbeing Performance

We are committed to providing a safe and healthy work environment for you, and any visitors to our sites. You must take reasonable care for your health and wellbeing, and safety and that of others. You also must comply with reasonable instruction that is given by management, which ensures you are in line with KGL's Health and Safety Policy, the associated Performance Standards and Procedures, and the applicable health and safety legislation and regulations. Refer KGL's policies on [Health and Safety](#) and [Mental Health and Well Being](#).

Social and Environmental Performance

We are committed to a high standard of care for the natural environments and communities in which we operate. We respect the cultural values, traditions and beliefs of those communities. Building and maintaining strong supportive relationships and partnerships with local communities drives value creation for both the business and the community. As a minimum, you must comply with KGL's [Environmental Policy](#) and the applicable environmental legislation and standards.

Compliance

You and your manager are responsible for making you aware of this Code of Conduct and all other expectations of KGL, including, but not limited to, the KGL Policies, Standards and Procedures. It is your responsibility to make sure you understand and comply with them.

Reporting Non-Compliance

KGL is committed to ensuring you can raise concerns regarding illegal conduct or malpractice in good faith without being subjected to victimisation, harassment or discriminatory treatment, and to have such concerns properly investigated. If you become aware of a breach or a suspected breach of this Code of Conduct, please report it immediately to your manager & Executive Chair or refer KGL's [Whistleblower Policy](#).



Denis Wood
Executive Chair

18 August 2020

OUR VALUES are at the core of everything we do



INTEGRITY
We do what we say



ACCOUNTABLE
We own our actions



RESPECTFUL
We act with dignity



SUSTAINABLE
We achieve
robust outcomes