

Code of Conduct

At Indus Mining, all employees are expected to work towards achieving business goals with openness, honesty, integrity and in an ethical manner. These expectations include the requirement of each employee to follow all applicable laws in the conduct of their role and to act with accountability for their own actions.

Key Principles

The key principles, values and standards of behaviour that guide the way we work at Indus Mining follows.

▪ **Bribery and Corruption**

Any actual or suspected bribery or corruption, or any action or inaction that may be perceived as being a bribe or as corrupt is absolutely prohibited in all business dealings by any person within Indus Mining. Bribery refers to a payment (of any value) that is made to any person in cash or in kind where there is an actual or implied intention or purpose to distort or to influence any decision-making process; to achieve any particular outcome; to influence a person's decision; to encourage any person to secure an improper commercial advantage; or to enter a dishonest arrangement. Any payment to any person, within or external to Indus Mining, that is intended, or which can be implied to intend to achieve a particular outcome, or which could otherwise be defined as a facilitation payment is considered to be included under this definition and is equally prohibited.

▪ **Equality in the Workplace**

Indus Mining does not tolerate any form of harassment, bullying, workplace discrimination or physical abuse in any of our workplaces.

▪ **Conflict of Interest**

Nothing that an employee does within or outside the workplace should conflict with their responsibility to Indus Mining or compromise their ability to make impartial business decisions in any way.

▪ **Confidential Information**

Commercially sensitive and other information regarding Indus Mining and its business activities which is gained during an employee's employment, or any personal information about any past or present employee of Indus Mining must not be passed on to external parties or be used for personal gain.

▪ **Misappropriation of Company Assets and Time**

Indus Mining employees must not use Company materials or assets for personal benefit or provide benefit to other parties external to the Company without permission.

▪ **Accuracy of Company Records and Reports**

Falsifying, concealing, altering, destroying, or otherwise tampering with company records of any type and company information, or creating misleading or incorrect and inaccurate information is not permitted and will not be tolerated.

▪ **Leadership**

All employees in formal leadership roles who are required to manage and to supervise staff or contractors are required to promote a collaborative workplace, and to work positively, constructively, and harmoniously with all employees and contractors to improve communication, teamwork, and business performance.

Breach of the Code of Conduct

In cases where any employee is concerned about any actual or suspected breach of this Code of Conduct; or, if any employee is, or becomes aware of any inappropriate or unlawful behaviour which has occurred that may represent a breach of this Code, then it is an employment requirement that they raise the issue promptly to the appropriate leader, including the relevant member of the Indus Mining senior leadership team as required.

The Company will take all reasonable steps to keep the details of the concern or issue, including the identity of the person who has raised it, confidential throughout any investigation process. There shall be no prejudicial treatment in any way, or by any person towards any other person who raises any concern about an actual or suspected breach of this Code.

The reporting of any breach of this Code that is false, vexatious, misleading, or slanderous is prohibited. Any concern raised by any person about a breach of this Code, which is investigated and found to be vexatious, ill-intended toward others, unsubstantiated, without foundation, or intended to vilify any other person will be treated as a serious breach of this Code and will be followed up accordingly.



Ben Van Roon
Managing Director
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