

CODE OF CONDUCT

A COMPASS TO GUIDE OUR DAILY DECISIONS AND ACTIONS



NEW HOPE
GROUP

1 MARCH 2022



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A MESSAGE FROM OUR CHIEF EXECUTIVE OFFICER

OUR PURPOSE

To deliver long-term shareholder value through responsible investment, marketing and asset management.

OUR VISION

Energising our people, communities and customers.

OUR CORE VALUES

- Respect
- Resilience
- Integrity
- Responsibility
- Wellbeing
- Collaboration

The New Hope Group¹ Code of Conduct ensures we do the right thing, enabling our success now and into the future.

As we continue to work as a lean and agile business, our Code acts as a roadmap, guiding us in the way we operate, informing what we do and how we do it.

The Code reinforces our core values, informing how we respond to the dynamic environment of our industry and navigate the important relationships we have with our people, communities and customers. Living our Code each day enables us to make informed, ethical decisions that make a difference and empowers us to provide long term value to our shareholders.

Our diverse team shapes who we are as a business. As you apply the Code to your work and relationships, I ask you to seek opportunities to challenge the status quo, driving towards better results for our people, communities, business and shareholders. Together, as an inclusive and effective team, we will continue to achieve safe production and deliver high performance.

The Code connects each person who works for or with New Hope Group to a common way of working through our visions, purpose and values. Where you believe there have been activities or behaviours that do not align the expectations of our core values or the Code, I ask that you report the matter appropriately and be an active bystander. Demonstrate care for your teammates and intervene where inappropriate behaviours are observed in the workplace.

I ask our team, including our employees, contractors, suppliers (where under a relevant contractual obligation), Executive Officers and Directors of New Hope Group to understand their responsibilities, and to individually uphold the Code.

I look forward to us working together to achieve a strong and productive future.

Rob Bishop
Chief Executive Officer

ABOUT THE CODE OF CONDUCT

New Hope Group's Code of Conduct is based on our core values. We believe consistent application of the Code will ensure we support and continue to develop New Hope Group's desired culture.

The Code guides the daily decisions we make and the actions we take. It does not set out prescriptive rules, explain every aspect of our policies, procedures and guidelines, nor is it meant to replace your own judgement.

The Code defines the minimum requirements and provides direction when applying New Hope Group's core values.

We therefore must be mindful of our responsibility to be familiar with the Code, as well as all supporting policies, procedures, guidelines, legislation or other matters relating to our particular area of work.

OUR EXPECTATIONS OF YOU

Each person who works for or with New Hope Group including employees, contractors, suppliers (where under a relevant contractual obligation), Executive Officers and Directors of New Hope Group companies (our people or team members) must adhere to the Code of Conduct.

Ensure you understand the responsibilities, policies, procedures, legislation, or other requirements that apply to you, and adhere to them — ignorance does not relieve you of any obligation to comply.

Where you identify a potential breach of the Code, you are expected to raise the matter with the appropriate person.



¹ New Hope Group includes New Hope Corporation Ltd and all its subsidiary companies may be referred to as New Hope, NHG, we, our, the company or us in this Code.

OUR CORE VALUES

The Code has been developed to foster a culture of effective working relationships and working environment for all those who work for or engage with the company. Our core values reflect what we consider important. They can be thought of as principles the company and individuals live by, and should influence our decision-making and ways of working.



RESPECT

We listen and treat others as we expect to be treated.

- I listen and ask questions without judgement.
- I consider how my actions may impact people and outcomes.
- I adapt my approach to work effectively with others.
- I encourage different views to be shared and considered.



RESILIENCE

We are adaptable and see opportunity in change.

- I am flexible and adaptable to change.
- I take opportunities to grow and develop.
- I reframe setbacks as opportunities.
- I support others in times of change.



INTEGRITY

We are ethical, honest and can be trusted to do the right thing.

- I honour my commitments.
- I do the right thing, even when no one is watching.
- I am open and honest.
- I address difficult issues.



RESPONSIBILITY

We are empowered and accountable for our actions.

- I draw on my experience and resources to make informed decisions.
- I take ownership of my actions.
- I reflect and find solutions when things don't go to plan.
- I am proactive and use my initiative.



WELLBEING

We seek to prevent harm, promote safety and enhance health.

- I address at-risk behaviours on the spot.
- I identify and manage potential and existing risks.
- I take responsibility for my own physical and mental wellbeing.
- I support the wellbeing of my teammates.



COLLABORATION

We work together and focus on the best outcome.

- I build relationships based on trust.
- I openly share my knowledge and ideas with others.
- I partner with others to achieve shared goals.
- My actions are guided by what is best for New Hope Group.



CODE OF CONDUCT QUICK TEST

If in doubt when making a decision or asked to do something, try the Code of Conduct test.

Feeling discomfort or having trouble when answering any of the questions in the Code of Conduct test indicates you should rethink your decision or ask someone for advice.

 <p>SAFETY Could it directly or indirectly endanger someone or cause them injury?</p>	 <p>FAMILY What would I tell my partner, parent or child to do?</p>	 <p>CONSCIENCE Does it fit with my personal values?</p>
 <p>MEDIA If the story appeared in the media, would I feel comfortable with the decision?</p>	 <p>LAW Is it legal and in line with our policies, procedures and guidelines?</p>	 <p>FEEL What's my intuition or gut feel? If it feels bad, then it probably is bad.</p>



WE WORK SAFELY

OVERVIEW

New Hope Group is committed to providing a safe work environment, where our people go home safely every day. Your personal commitment to safety keeps you and others safe.

When beginning a task, think carefully about what you need to do and the risks associated with the task at hand.

New Hope Group believes safe production is vital to ensure you and your teammates return home safely every day.

Please also refer to the Life Rules or Golder Rules relevant to your work area. Available in all work locations or via your supervisor.



YOUR PERSONAL COMMITMENT TO SAFETY

All New Hope Group team members are asked to make the following commitments.

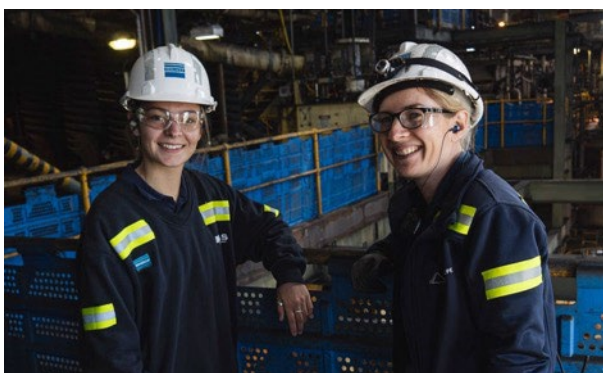
As a New Hope Group team member, I will:

- look out for the safety and wellbeing of myself and others
- Immediately stop any job, task or behaviours that I believe is unsafe
- report hazards when I become aware of them
- adhere to the company's Life Rules/Golden Rules and the principles of safety control, risk awareness, stress management, operating attitude and professional orientation
- not use equipment that I am not trained or authorised to use
- always wear the appropriate personal protective equipment (PPE)
- report all incidents, accidents and injuries.

WELLBEING PROGRAMS

We care about the health and wellbeing of our team members and provide access to health services and facilities through formal health and wellbeing programs.

Each of the company's sites and offices operate their own tailored health and wellbeing program, ranging from flu vaccinations and skin cancer checks, to monthly health and wellbeing education topics.



EMPLOYEE ASSISTANCE PROGRAM (EAP)

We recognise both work and home environments have an impact on health and wellbeing, and our employees and/or their immediate families may benefit from psychological counselling at times.

NHG offers a free and confidential service to assist employees in managing their personal wellbeing.

Employees can contact our EAP providers directly. Details are available on noticeboards, from your leader or via Human Resources.



PEER SUPPORT PROGRAM – MATES HELPING MATES

The company has a peer support program called 'Mates Helping Mates'.

This is a volunteer program in which employees are trained to assist workmates affected by personal and work challenges.

Team members are encouraged to speak to a Peer Support Officer if they need support.

OUR COMMUNITIES AND THE ENVIRONMENT

WE VALUE COMMUNITY

We recognise that long term business sustainability is dependent on our social, economic and environmental performance, and that our community will measure our success across these areas.

The communities in which we operate are important to NHG, and we take our commitment as good corporate citizens seriously.

We seek to engage the community often, to build enduring relationships with our community stakeholders.

We operate with mutual respect for others, therefore it's important we understand the issues that are important to our communities, and that our communities understand what is important to us.

At New Hope Group, we believe effective and holistic environmental management is crucial to the success of our operations.

We work to identify and implement the most practical and sustainable methods of environmental management to minimise and mitigate the impacts of our activities on the environment and the community.

We empower our people to take personal responsibility for working in an environmentally responsible manner. This is essential not only to our business, but to the sustainable development of Australia's mining industry.

A Health, Safety and Environment Management System guides NHG's environmental practices, supported by advice from our own team of environmental specialists and independent consultants.

We routinely review our practices and share environmental knowledge to facilitate continuous improvement across our business, supporting positive outcomes for the environment and neighbouring communities.

OUR COMMITMENT

At New Hope Group, our commitment to the environment includes:

- Integrating our core values into environmental management practice
- Understanding, assessing and managing potential environmental risks and seeking opportunities for environmental benefits
- Identifying and implementing opportunities to efficiently utilise natural resources
- Effectively reporting on and auditing our environmental performance across our operations.



WORKING WITH INTEGRITY AND THE LAW

OVERVIEW

We respect the laws, regulations, policies, procedures and guidelines applicable to the company as well as to our individual work.

In conducting your day-to-day business activities, you must ensure you fully and diligently comply with all applicable laws, as well as company policies, procedures, guidelines and contractual obligations.

You are responsible for ensuring that you are familiar with the laws and obligations which are relevant to your work.

Under no circumstances should our people take any action or knowingly be a party to any action that is illegal or could be regarded as illegal. If in doubt, contact the legal team.

STATUTORY REQUIREMENTS

All team members must adhere not just to the letter of the law but to the intent, and apply the spirit of all legislative and regulatory requirements. These include (without limitation) legal requirements relating to health and safety, dealings in securities, anti-competitive conduct, bribery and corruption and employment practices.

Ignorance of applicable laws will not be considered an appropriate reason for non-compliance. However, we recognise that legal requirements can be complex and difficult to interpret. The legal team is available to assist you if you are unsure about your legal obligations.

COMPLIANCE WITH POLICIES, PROCEDURES, GUIDELINES AND CONTRACTUAL OBLIGATIONS

All team members have an obligation to comply with the policies, procedures and guidelines of the company, together with contractual obligations which bind the company (including but not limited to commercial or confidentiality terms).

The company policies, procedures and guidelines can be accessed on the intranet or can be obtained from your leader. Key policies such as the *Speak Up (Whistleblower) Policy*, *Health and Safety Policy*, *Anti Bribery and Corruption Policy*, *Trading in Company Securities Policy* and the *Modern Slavery Policy Statement* are also available in the Corporate Governance section of the website.

Policies are reviewed and updated when required, and are developed on the principles of our core values. They are in line with this Code and support the company's legal obligations.

CONFLICT OF INTEREST

We display integrity by reporting any actual or potential conflicts of interest.

A conflict of interest arises when your personal interests interfere with your NHG role or ability to make objective decisions on behalf of the company.

It also applies to the use of your position, or company assets being used for personal advantage or the advantage of others.

All team members should formally declare any financial or personal interests (including shareholdings) which may put them in a position of conflict when making or contributing to any decision in the performance of their role with NHG.

Although the Code does not list all situations that may present as a conflict of interest, some of the more common conflict situations are:

- **Financial conflicts:** investing in a company that does business with NHG, including entities NHG targets for acquisition where you may have or obtain price sensitive information in respect of that entity
- **Personal relationships:** directly supervising family members, close personal relationships or friends, or when these relationships enable improper benefit from your position in or with the company
- **Outside activities:** allowing a second job to take away the loyalty, time, energy or talent you bring to NHG, or starting a business using information gained in your role with NHG.

WHAT TO DO WHEN A POTENTIAL CONFLICT ARISES

- If you believe you have a potential conflict of interest, you must report it in writing to your leader
- Your leader will review the case and establish whether a conflict exists. Your leader may consult with you and others in determining the decision
- If your leader determines a conflict exists, appropriate controls will be put in place (e.g. you may be excluded from making a relevant contract decision)
- The conflict and those controls should be reported to the NHG Company Secretary for recording on the Conflict of Interest Register cosec@newhopegroup.com.au.

OUR EXPECTATIONS OF YOU

- Comply with all applicable laws, regulations and obligations
- Comply with all relevant policies, procedures and guidelines
- Advise the business of any actual or apparent conflict of interest, of a personal or financial nature, that may impact on your ability to make objective decisions
- Do not engage in anti-competitive behaviour
- Ensure there is no actual or apparent conflict between your personal interests and the performance of your duties
- Identify and disclose in full any possible conflicts of personal or financial interests
- Follow the *What to do when a potential conflict arises* steps and reporting requirements as outlined in the Code.

WORKING WITH INTEGRITY WHEN WORKING WITH OTHERS

WORKING WITH OTHERS

A vital aspect of creating a safe and inclusive workplace is taking accountability for our own actions. All team members are expected to behave in a manner which reflects our core values.

We are committed to providing a workplace that is inclusive and safe for all, and is free from any form of inappropriate behaviour, including but not limited to unlawful discrimination, bullying, harassment, sexual harassment or victimisation.

Any person who is found to have bullied, harassed, directly or indirectly discriminated against another person, or who has participated in the bullying or harassment of another person, will be subject to disciplinary action (which may include termination of employment).

It is important we support each other. Where you see inappropriate behaviour do not stand by and accept, ignore or encourage these behaviours. We ask all team members to be an active bystander, speaking up against the behaviours and accepting your accountability to report inappropriate behaviour.

The *Appropriate Workplace Behaviours Policy* and anti-discriminatory practices support the prevention of bullying, harassment, sexual harassment, discrimination and other inappropriate behaviours in the workplace.

Examples of inappropriate behaviour includes but is not limited to:

- Behaviours of a sexual nature including unwelcome physical contact, or explicit or suggestive comments
- Horseplay, practical jokes or skylarking at work
- Workplace violence
- Recording of conversations in the workplace, or at work-related events or meetings without approval from an executive member and the consent of all parties present
- Acting inappropriately when attending NHG internal events (e.g. Christmas parties or other events) or external functions, conferences, on social media or, while wearing a NHG uniform in public
- Making false or malicious statements about our people or the company (in person, to others or on social media).

NHG team members must not participate in any behaviour that could cause offence or harm to others in or outside the workplace where behaviours are likely of affecting team members or the Company.

For more detailed information please refer to the *Company's Appropriate Workplace Behaviours Policy*.

CONTRACTS WITH CONTRACTORS, SUPPLIERS, CUSTOMERS AND THIRD PARTIES

We must maintain high ethical standards in the acquisition and supply of goods and services. Where NHG undertakes a competitive sourcing process, each potential supplier is entitled to expect NHG will follow principles of fair, competitive bidding. All quotations and related information will be treated as confidential and will not be used with the intent of giving or receiving an unfair advantage.

GIFTS AND INCENTIVES

In some circumstances, giving and receiving gifts, hospitality and travel can build strong working relationships and goodwill between NHG and those we do business with.

However, gifts, hospitality or trips that are extravagant, lack transparency or a legitimate business purpose may be viewed as a means to influence decision making or simply inappropriate, and may erode trust and harm our business.

As a representative of NHG, you must not receive or offer any gifts, rewards or benefits that could be interpreted as an exchange for a favour or favourable consideration.

If unsure, you should refer to the Code of Conduct test (page 2) and speak with your leader.

If you intend to accept a gift, reward or benefit (including hospitality or entertainment) from a contractor, supplier or third party we do business with (or who is seeking to do business with us) over the total value of AUD\$250, you are required to seek formal approval from your General Manager or above and advise the NHG Company Secretary prior to accepting it.

OUR EXPECTATIONS OF YOU

- Do not be involved in any activities or behaviour that is inappropriate
- Ensure your behaviour is in line with the core values both at work or at external functions
- Provide details of any gifts received over the prescribed value to the NHG Company Secretary
- Do not accept personal kickbacks from suppliers under any circumstances
- When working with contractors and suppliers, ensure they are treated fairly and with respect
- You will not victimise anyone as retaliation for raising a genuine concern of inappropriate behaviours
- Where you observe inappropriate behaviours, do not just stand by — be an Active Bystander, speak up and report the matter to the appropriate person (See page 13 for reporting a concern)
- Understand it is a violation to knowingly make false accusations, provide misleading information, or to interfere or refuse to cooperate with an investigation.

WE VALUE OUR PEOPLE

Our people are fundamental to our success. New Hope Group believes that a diverse workforce is essential for sustainable business growth.

We treat our people fairly and with respect, and acknowledge their contribution and achievements.

DIVERSITY AND INCLUSIVENESS

We recognise that best business outcomes are driven through collaboration of ideas and opinions from diverse teams — recognising the difference individuals bring from their own backgrounds, values, perspectives and experiences.

We do this by creating opportunities for all employees to achieve their full potential. Our teams are diverse and inclusive and our respectful and supportive culture attracts and retains a talented workforce, representative of the communities in which we operate.

We commit to ensuring all individuals are provided with equal opportunity as detailed in our Diversity & Inclusion Statement.

HANDLING WORKPLACE CONFLICT

We recognise that individuals may experience a conflict with their work colleagues or leader.

These conflicts may be about your performance, conduct or how you are being treated. Where possible, you should first attempt to resolve the issue directly with the individual.

If the matter cannot be resolved directly between yourself and the other parties, seek assistance and guidance from your leader or other relevant senior management.

The company follows due process for grievances to ensure that issues are dealt with fairly and appropriately. This includes providing all parties the opportunity to tell their side of the story before any decision is made.

For more detailed information please refer to the *Issues Resolution Procedure*.

PERFORMANCE REWARD AND RECOGNITION

High performance that supports NHG's core values, vision and purpose is encouraged, recognised and rewarded; which in turn encourages, motivates and retains employees.

New Hope Group's culture is one that supports an environment where employees are valued, and where high performance is recognised.

We assess skills and competencies, recognising talent, performance and potential by providing appropriate support and development opportunities.

Employees are recognised through several formal and informal reward and recognition programs and are asked to actively participate in performance review activities throughout the year.

Additionally, team members, where relevant, will have access to other benefits including health and wellbeing programs, development programs, education assistance and other benefits as advertised within the team.

EMPLOYEE FLEXIBILITY

New Hope Group aims to support flexibility and acknowledges the importance of work-life harmony in a manner that supports employees' choice and business requirements.

Flexible work arrangements will be considered on a case-by-case basis in line with the *NHG Flexible Work Arrangements Guideline*.

Additionally, further flexibility is supported both formally through a range of leave options, and informally regarding ad-hoc or temporary arrangements.

Arrangements may range from reduced hours, amended start/finish times, part time work or other alternative working arrangements.

OUR EXPECTATIONS OF YOU:

- Be respectful of the differences in one another
- Encourage collaboration through shared diverse opinions and ideas
- Foster a culture that reflects our core values
- Challenge self or others' potential bias when selecting the best person for the job
- Recognise and reward performance and self-improvement
- Address conflict as soon as possible, with support when needed.





WE VALUE OUR BUSINESS AND ASSETS

OVERVIEW

We are all accountable for the company's records and assets under our control including intellectual property, company records, physical assets and electronic assets (which includes mobile devices and computers).

How we manage our records, confidentiality, propriety information and assets supports the company's reputation and credibility, and ensures the company meets its legal and regulatory obligations.

Actions to protect the company's reputation and credibility include (but are not limited to) the appropriate use of:

- Company data, records and knowledge
- Accurate reporting and record keeping (internal and external)
- Use of photographs of company property operations or employees (with permission)
- Appropriate use of any New Hope Group logo/s in publications or advertising or on clothing (with permission)

RECORD KEEPING

Ensure the accuracy of all company business and financial records. These include not only financial accounts but other records such as quality reports, time records, safety reports, production information, expense reports and submissions for internal and external reporting requirements.

Ensure that you protect, store and manage information in the systems provided to you and following the policies, procedures and guidelines.

Ensure that you dispose of information only when appropriate, including never disposing of information that may be relevant to current or potential litigation until you are notified it is no longer required.

This includes records such as:

- Technical, operational and financial data
- Information on suppliers of goods and services to NHG
- Employee records (must be kept for a minimum period of seven years from the date the individual ceases employment)
- Safety, medical or other records as required by legislation.

SAFEGUARDING CONFIDENTIAL AND PROPRIETARY INFORMATION

It is the company's objective to maintain the integrity and security of its confidential information and intellectual property (IP), which includes information related to the company's business and activities.

The company's confidential information and IP is a valuable resource which provides the opportunity for the company to differentiate itself from its competitors and to provide value to its shareholders and customers.

We do not provide third parties with the company's confidential information without the express written permission of the Chief Executive Officer or Chief Financial Officer.

In cases where our people are contacted by third parties requesting information, the request must be forwarded to the relevant site or departmental leader to allow an initial review of the merits of any information requests from such third parties.

In cases where the leader forms the view that the information should be supplied, the leader must forward a request with their recommendation to the Chief Executive Officer or Chief Financial Officer as appropriate.

Team members should report any identified data breaches to IT and the Company Secretary.

THEFT, FRAUD OR MISAPPROPRIATION OF COMPANY ASSETS

Our people should not be involved in theft, fraud or misappropriation of company assets.

This includes but is not limited to:

- Intentionally disregarding or abusing standard company procedures, e.g. expense claims and Disposal of Assets procedure
- Misuse of authority or position, or company property to gain benefit for yourself or another person
- Withholding information relating to New Hope Group, its suppliers or customers.

Inappropriate use of credit cards outside of New Hope Group policy (i.e. personal use or obtaining cash advances) may lead to disciplinary outcomes (including termination of employment).

The use of cards may also be withdrawn at the company's discretion.

USE OF COMPANY COMPUTERS, EMAIL, INTERNET AND MOBILE PHONE

Information Technology (IT) systems provided by New Hope Group are company property and their purpose is to facilitate and support the business.

All employees have the responsibility to use these resources in a professional, ethical and lawful manner.

IT systems cannot be used for knowingly transmitting, retrieving or storing any material that breaches any legal regulation to which the company or user is bound, or that breaches any NHG policy.

Limited, occasional or incidental use of electronic media for non-business purposes is accepted, provided that such use does not negatively impact upon the delivery of company business.

Electronic data is the property of the company, and as such New Hope Group reserves the right to monitor and review any electronic material to ensure IT systems are being used in compliance with the law, this Code and other company policies, procedure and guidelines.

Except where explicit authorisation has been granted by company management, employees should only access data that is within their area of responsibility.

Mobile phones are provided to employees for use in performing the requirements of their role. Inappropriate use of mobile phones may lead to disciplinary action (including termination of employment) or the phone being returned.

Only software and/or hardware registered and approved through the New Hope Group IT Team may be used.

Employees should contact the IT Team if they have any questions by emailing helpdesk@newhopegroup.com.au

The company may carry out any checks or searches of information held on company assets for example emails, or review employee's usage of those assets for example, internet usage.

Employees must immediately notify the IT Team if they become aware that any company property or data is lost, or if there is a potential or actual data or security breach.

Additionally, if the loss of information involves the loss of personal information of our employees, contractors, suppliers or third parties, it must be reported to the NHG Company Secretary.

OUR EXPECTATIONS OF YOU

- Be responsible for appropriate use of NHG assets, both physical and non-physical
- Know and follow our records management requirements
- Never falsify company records, reports or documents
- Limit personal use of company assets
- Appropriately use company computers, email, internet and mobile phones
- Do not become involved in theft, fraud or misappropriation of company assets
- Do not divulge or allow others to use your system passwords or company IT systems
- Report suspicious activities including cyber-attacks or malicious emails, text messages or phone calls to IT and the NHG Company Secretary cosec@newhopegroup.com.au.

RESPECT ON SOCIAL MEDIA AND MEDIA RELATIONS

Everything we communicate can have an impact on our teammates, reputation and brand.

We must ensure information we share is reliable, consistent and accurate.

APPROPRIATE USE OF SOCIAL MEDIA

New Hope Group respects employees' rights to engage on social media around topics relating to the company. While using social media, employees should consider our core values in all interactions, ensuring their behaviours do not affect other team members or damage the company brand or reputation.

Some general guidelines on using social media include:

- Employees may associate themselves with New Hope Group (for example, to state that they are an employee) however when posting comments, they must indicate that their online posts are personal and do not reflect the views of the company
- Any photos or videos of work areas or people must be authorised for release by the site General Manager and any individuals in the photos or videos before they are distributed or published
- Employees should always consider our core values when communicating with others
- Employees are not to disclose confidential or non-public information relating to NHG business, operations. See the company's Privacy Statement for more information.

MEDIA RELATIONS

Any approach from the media should be directed to the NHG Company Secretary. Only authorised persons can speak on behalf of the company to media.

Any content/presentations for external publication or public speeches about New Hope Group should be reviewed in advance by the NHG Company Secretary.

CONTINUOUS DISCLOSURE

As the company is listed on the ASX, the Continuous Disclosure Policy must be followed for any information that is 'market sensitive'.

OUR EXPECTATIONS OF YOU

- Appropriately use social media platforms
- Refer all media enquiries to the NHG Company Secretary
- Advise the External Affairs team should you be approached to present to external parties or forums
- Ensure you receive approval before releasing any photos or videos of work areas or people.

Team members may also have rights and responsibilities under the 'Speak Up' (Whistleblower) Policy which apply in addition to the rights and responsibilities set out in this Code.

If you are raising a concern, or someone is raising a concern with you, please refer to the 'Speak Up' Whistleblower Policy for further information or seek advice from the Whistleblower Officer, (speakup@newhopegroup.com.au) or, Legal or Human Resources.

CODE OF CONDUCT CONCERNS

All queries about the interpretation and application of the Code will be treated seriously and respectfully, and will be assessed in a timely manner.

If you raise a concern with your leader, your leader's leader or Human Resources, the course of action will depend on the nature and severity of the issue.

In many cases advice, support and guidance will enable you to resolve the issue yourself. If this is not possible or if it requires referral, mediation or investigation, you will be advised on the next steps, expected timeframes and the process for receiving feedback.

Where a reported concern is founded to be in breach of the Code, NHG policies, procedures, guidelines or legislation, it may result in disciplinary action (including termination of employment). Civil or criminal action may be considered where an individual is involved in matters including but not limited to sexual harassment, violence, theft, fraud or other illegal activities.

RAISING A CONCERN

If you think an action or behaviour does not reflect the expectations in the Code of Conduct, you have a responsibility to raise a concern.

When you raise a concern, it is important enough information is provided to enable NHG to follow up appropriately. Be as open and honest as you can as this will assist in a thorough and effective response.

Any employee who has reasonable grounds for raising a concern will be supported to do so. NHG prohibits any punishment, disciplinary or retaliatory action being taken against anyone for raising a genuine concern. Victimisation or retaliation are grounds for discipline, including dismissal.

Refer to the company's Issues Resolution Procedure for further information.

IF YOU RECEIVE A CONCERN

- Treat all concerns seriously and where possible, in confidence
- Respond to issues raised in a prompt and professional way
- Provide accurate information and advice consistent with the Code, NHG policies, procedures and guidelines, or seek the advice of experts with the right knowledge and objectivity
- Know where to go for further support or advice
- Report all concerns to Human Resources for recording, including the actions taken in response to the concern and the final outcome
- Dependent on the nature of a matter it can be reported under the 'Speak Up' (Whistleblower) Policy.