

SUPPLIER CODE OF CONDUCT

Approved by	RayGen Board
Effective date	11 February 2025
Review date	To be reviewed February 2026

1. INTRODUCTION TO THE SUPPLIER CODE OF CONDUCT

RayGen Resources Pty Ltd including all its Related Bodies Corporate (as defined under the Corporations Act 2001) (**RayGen**) is committed to operating in accordance with all applicable laws and regulations and in accordance with the highest standards of ethical behaviour at all times.

This Supplier Code of Conduct (**'Code'**) outlines RayGen's expectations of Suppliers with whom it conducts business (including their affiliates or subsidiaries) with respect to responsible ethical, social, labour and environmental practices.

Where this Code refers to 'Suppliers' this means suppliers, vendors and contractors that provide goods and / or services to RayGen, or its related entities either directly or indirectly.

All Suppliers are expected to comply with this Code and communicate this within their own supply chains. All Suppliers must educate their representatives to ensure they understand and comply with this Code.

The expectations outlined in this Code are in addition to the Supplier's contractual, legal and regulatory obligations with which they are also expected to comply.

2. HEALTH AND SAFETY

RayGen expects its Suppliers to share its commitment to workplace health, safety and the wellbeing of employees and others who could be affected by their activities by implementing robust policies and procedures and complying with relevant laws in respect of Work Health and Safety.

This includes but is not limited to the following:

Training and machine safeguarding: Suppliers must ensure that their workers are adequately trained and have the correct equipment to do their jobs, and that any machinery is regularly maintained and evaluated for safety hazards with suitable controls implemented (e.g. physical guards, interlocks, barriers).

Emergency Preparedness: Suppliers are required to identify and plan for emergency situations and implement and train their workers on response systems, including emergency reporting, alarm systems, worker notification and evacuation procedures, worker training and drills, first-aid supplies, fire detection and suppression equipment, and unblocked facility exits.

Sanitation and Housing: Workers must have reasonable access to clean toilet facilities and potable drinking water. If Suppliers provide food accommodations, they must include sanitary food preparation, storage, and eating facilities. Any residential accommodation provided must be clean, healthy (including adequate heat and ventilation) and safe (including being equipped with fire alarm, detection, and suppression equipment).

3. LABOUR AND HUMAN RIGHTS

RayGen is fundamentally committed to ensuring that there is no slavery or human trafficking in its supply chain or in any part of the business. RayGen requires Suppliers to consider the risks of Modern Slavery practices in their operations and supply chains and identify these where they are found to exist.

In respect to conditions of employment, in addition to any other legislative obligations, Suppliers must comply with the following specific requirements:

Modern Slavery

- Suppliers must:
 - comply with all relevant modern slavery laws and regulations;
 - make all reasonable efforts to ensure their operations and supply chains are free from child labour or harsh or inhumane treatment including torture, physical and psychological abuse, slavery, servitude, trafficking of persons or forced marriage;
 - make all reasonable efforts to ensure their operations and supply chains are free from deceptive recruiting practices, forced, bonded, prison or involuntary labour. All work must be voluntary and workers shall have the right to terminate their employment at any time without penalty, by giving reasonable notice;

- not require employees to submit deposits or government-issued identity documents (such as passports) to be held as a condition of employment;
- comply with modern slavery obligations set out in their contracts with RayGen; and
- take measures to identify and mitigate modern slavery risks along their supply chain and in their operations.

Employment relations

- Suppliers must:
 - comply with all relevant labour laws and regulations, including providing workers with legally recognised employment relationships and giving workers their legal entitlements with respect to pay and working conditions;
 - provide workers with written contracts of employment which must be in a language they understand;
 - when the subcontracting of recruitment and hiring is necessary, ensure that the labour agencies they engage operate legally, are certified or licensed by the competent authority, do not engage in fraudulent behaviour that places workers at risk of forced labour or trafficking for labour exploitation;
 - ensure that they do not employ anyone under the local legal minimum age for work, or under the age where schooling is mandatory, whichever is higher; and
 - provide workers with access to: i) a grievance mechanism without fear of retaliation, intimidation, harassment, discrimination or victimisation, and/or ii) RayGen's Independent Whistleblower Service.

Discrimination

- Suppliers must:
 - comply with applicable workplace laws in respect of discrimination, harassment and bullying in their supply chain and operations; and
 - have and uphold reasonable standards of behaviour in the workplace which apply to all workers and demonstrate an inclusive and respectful workplace, valuing diversity with no discrimination on the basis of race, caste, religion, nationality, age, gender, marital status, sexual orientation, disability, union membership or political affiliation.

Freedom of association

- Suppliers must:
 - ensure that workers have the right of freedom to move and associate, including collective bargaining, the right to join or form trade unions (unless prohibited by legislation) without interference, discrimination, retaliation or harassment, and not require or pressure workers to surrender government issued identification, passports or work permits.

4. ENVIRONMENT

RayGen is committed to limiting any harmful impacts of its operations on the environment and to maintaining environmentally responsible policies and practices. Suppliers must minimise their environmental impact in the way they conduct business and encourage others to do so.

RayGen expects its supply chain to:

- ensure compliance with relevant environmental legislation, industry standards and codes, together with any necessary environmental permits and registrations;
- maintain policies and practices that reduce the risk of pollution, loss of biodiversity, deforestation, damage to ecosystems and greenhouse gas emissions;
- maintain policies and practices for the efficient use of energy, water and natural resources;
- ensure the safe storage, transportation and disposal of hazardous substances including hazardous waste, including providing workers with appropriate training on the safe-handling and disposal of hazardous substances;
- monitor and control wastewater or solid waste generated from operations before disposing in accordance with applicable laws; and
- applying environmental management system principles, in order to establish a systematic approach to the management of risks, hazards, and opportunities associated with the environment.

5. ANTI-CORRUPTION AND ANTI-BRIBERY

Anti-corruption Laws

Suppliers must comply with the anti-corruption laws, directives and/or regulations that govern operations in the countries in which they do business. Suppliers must not offer or make any improper payments of money or anything of value to government officials, political parties, candidates for public office, or other persons. This includes a prohibition on facilitating payments intended to expedite or secure performance of a routine governmental action. Suppliers must exert due diligence to prevent and detect corruption in all business arrangements, including partnerships, joint ventures, offset agreements, and the hiring of consultants.

Illegal Payments

Suppliers must not offer any illegal payments to, or receive any illegal payments from, any customer, supplier, their agents, representatives, inspectors, auditors, or others. The receipt, payment, and/or promise of monies or anything of value, directly or indirectly, intended to exert undue influence or improper advantage is prohibited.

Gifts/Business courtesies

RayGen expects its Suppliers to compete on the merits of their products and services. The exchange of business courtesies may not be used to gain an unfair competitive advantage. Suppliers must ensure that the offering or receipt of any gift or business courtesy is permitted by law and is consistent with reasonable marketplace customs and practices and will not adversely impact the reputation of RayGen.

Fair Competition

RayGen expects its Suppliers to compete honestly and fairly, comply with applicable antitrust and competition laws and never participate in anti-competitive practices.

6. RECORD KEEPING

Suppliers are expected to maintain adequate records that accurately record all financial transactions and information regarding their business activities, labour, health and safety, and environmental practices in accordance with applicable laws, policies and procedures.

Disclosure of information is expected to be undertaken without falsification or misrepresentation.

7. CONFLICT OF INTEREST

RayGen expects its Suppliers to avoid all conflicts of interest or situations giving the appearance of a potential conflict of interest, in their dealings with RayGen. Suppliers must provide notification to all affected parties if an actual or potential conflict of interest arises. This includes a conflict between the interests of RayGen and personal interests or those of close relatives, friends, or associates.

8. INFORMATION AND PROTECTION

RayGen expects its Suppliers to properly handle sensitive information, including confidential, proprietary, and personal information. Information must not be used for any purpose other than the business purpose for which it was provided, unless there is prior authorization from the owner of the information.

RayGen and Suppliers will respect and honour each other's intellectual property rights.

9. PERFORMANCE WITH THE CODE

RayGen expects its Suppliers to commit to collecting and reporting information on its performance with the Code, including being cooperative with any RayGen inspection or audit. RayGen's monitoring activities may include on-site inspections of facilities, use of questionnaires, surveys or report cards, review of publicly available information, or other measures necessary to assess Supplier's performance.

Where Suppliers cannot meet the expectations of the Code, it must explain its reasons and any plans to address those reasons. If a Supplier identifies areas of non-compliance, the Supplier agrees to notify RayGen of the non-compliance as well as its corrective actions, including a timeline.

Suppliers must provide their employees with avenues for raising legal or ethical issues or concerns without fear of retaliation, and Supplier must have a process to investigate and resolve such issues and concerns.

10. REPORTING CONCERNS

RayGen asks anyone with whom it conducts business, including Suppliers, who has serious concerns about any of the issues detailed in this Code, to come forward at the earliest

opportunity. You can make a report to the Office of the Chief Legal Officer, Procurement Manager or via our independent whistleblowing service provider, Stopline, as detailed below.

- **Web** <https://raygen.stoplinereport.com/>
- **Email** makeareport@stopline.com.au
- **Phone** 1300 30 45 50
- **Mail** RayGen C/o Stopline, PO Box 403 Diamond Creek VIC 3089

For Suppliers, in addition to the above, their staff or contractors associated with the Supplier, can report under the applicable Supplier's internal reporting system.