

## CORPORATE CODE OF CONDUCT

### 1. Introduction and Purpose

All Comet Ridge stakeholders – shareholders, employees, customers, suppliers, creditors and the broader community – are entitled to expect Comet Ridge to manage its business and make its decisions with care, integrity and fairness. Comet Ridge is, and expects its Personnel to be, committed to doing so.

Acting in a manner consistent with this Code, and with the Comet Ridge's Values and its other corporate governance policies and procedures, will assist Comet Ridge in effectively managing its operating risks and meeting its legal and compliance obligations, as well as enhancing Comet Ridge's corporate reputation.

### 2. Scope of Corporate Code of Conduct

This Code applies to Comet Ridge Limited and all of its subsidiaries (Comet Ridge) and sets out the standards of behaviour expected of all Comet Ridge employees, directors, officers, contractors, and consultants (Personnel).

The Board and management approve and endorse this code of conduct and support the code and all it strives to achieve.

The Board and management Comet Ridge encourage all Personnel to consider the principles of the code and use them as a guide to determining how to respond when acting on behalf of the Company.

### 3. Responsibilities to shareholders and the financial community generally

The Company aims:-

- (a) to increase shareholder value within an appropriate framework which safeguards the rights and interests of the Company's shareholders and the financial community; *and*
- (b) comply with systems of control and accountability which the Company has in place as part of its corporate governance with openness and integrity.

### 4. Responsibilities to clients, customers and consumers

All Personnel are expected to act in accordance with the Comet Ridges Values and:

- (a) Operate with care, prioritising the safety and health of all Personnel and the environment and the communities in which Comet Ridge operates.

- (b) Act honestly and with high standards of personal integrity including treating other Personnel with respect.
- (c) Comply with the laws and regulations that apply to Comet Ridge and its operations.
- (d) Not knowingly participate in any illegal or unethical activity.
- (e) Not misuse or take advantage of the property or information of, or their position in, Comet Ridge for personal gain or to cause detriment to Comet Ridge.
- (f) Act in the best interests of Comet Ridge and not enter into any arrangement or participate in any activity that would conflict with Comet Ridge's best interests or that would be likely to negatively affect the Company's reputation; and
- (g) Strive to be a good corporate citizen and achieve community respect including by dealing with customers and suppliers fairly.

## **5. Employment Practices**

Comet Ridge will employ the best available staff with skills required to carry out vacant positions providing equality of employment opportunity.

The Company will ensure a safe workplace and maintain proper occupational health and safety practices commensurate with the nature of the Company's business and activities.

## **6. Use of Assets**

The Company's assets are critical to its business and future success. Personnel must ensure that Comet Ridge's assets are used for legitimate Comet Ridge purposes and in the best interests of the Company.

## **7. Responsibility to the Community**

The Company will recognise, consider and respect environmental issues which arise in relation to the Company's activities and comply with all applicable legal requirements.

## **8. Responsibility to the Individual**

The Company recognises and respects the rights of individuals and to the best of its ability will comply with the applicable legal rules regarding privacy, privileges, private and confidential information.

## **9. Compliance with Laws**

All Personnel must observe the rule and spirit of all laws and regulations, and requirements of regulatory and professional bodies, which apply to Comet Ridge and its operations. The Company has systems in place for monitoring and managing compliance, with laws, regulations and other key obligations including financial reporting. Comet Ridge and Personnel will be accountable for their actions.

## **10. Illegal or Unethical Behaviour**

Under no circumstances will any Personnel engage in any conduct which may constitute, or may be perceived to constitute, illegal or unethical activity. Such activity includes, for example, the giving or receiving of bribes, facilitation payments, inducements, commissions, or other improper benefits (whether or not such conduct has the purpose of furthering Comet Ridge's or the Personnel's interests).

All Personnel must comply with the Company's Anti-Bribery and Corruption Policy. Comet Ridge has a procedure in place for individuals to (anonymously) bring illegal or unethical activity to the attention of the Managing Director (or the Board as appropriate) for investigation. The procedure is set out in its Whistleblower Policy.

## **11. Compliance with the Code**

This Code is promoted to all Personnel and disclosed on Comet Ridge's website for reference by all stakeholders.

Strict compliance with this Code is mandatory. Breaches will be taken seriously and may be subject to disciplinary action, up to and including termination of a person's employment or appointment.

Actual or suspected breaches of this Code should be reported to the Managing Director or for Directors, the Chairman. Conduct materially inconsistent with this Code, or the Company's, will be reported to the Board.

## **12. Periodic review of code**

The Company will monitor compliance with the code periodically by liaising with the Board, management and staff especially in relation to any areas of difficulty which arise from the code and any other ideas or suggestions for improvement of the code. Suggestions for improvements or amendments to the code can be made at any time by providing a written note to the Company Secretary.

This version of the Corporate Code of Conduct was adopted by the Board on 25 April 2025