



CODE OF CONDUCT

REVIEWED AND APPROVED BY THE BOARD
ON 18 MARCH 2024





1. PURPOSE

IGO Limited's **(IGO) (Company) Code of Conduct (Our Code)** is a guide to the behaviours we expect of everyone who works for IGO and reflects many of the standards and procedures that are applicable within the Company. It is designed to provide clear information on how we are expected to behave in the workplace and how we should treat others. It does not replace any of our existing policies, standards or procedures – it simply underpins them and acts as a good point of reference for getting familiar with their basic principles.

2. KNOW YOUR RESPONSIBILITIES

2.1 Who Our Code applies to

Our Code applies to all our people when working for or on behalf of IGO. Given this, our people (including directors and contractors), are expected to behave in accordance with our values and Our Code. If you are working for or on behalf of IGO, you will be asked to confirm your commitment to Our Code by signing your contract of employment and agreeing to comply with Our Code. Further, for IGO employees, adherence to Our Code is a condition of employment.

Our Code applies to you whenever you are representing IGO, which may include outside of working hours or outside of your usual workplace. Agents, contractors, consultants, and other intermediaries should be advised that they are expected to observe the Code's principles when we engage them to work with us.

You are responsible for understanding and following the spirit and letter of Our Code.

We encourage you to consult Our Code often and incorporate its principles into your work.

2.2 Training

All IGO employees, are expected to participate in annual compulsory training on Our Code which will include information on the behaviours we expect of everyone who works for IGO and many of the standards and procedures that are referred to in Our Code.

2.3 Acting lawfully, ethically and responsibly

When working for IGO, we expect you to perform your role in a professional manner and act with integrity and objectivity, striving at all times to enhance IGO's reputation and performance. We expect you to:

- act ethically and responsibly
- conduct yourself with honesty, integrity and fairness; and
- comply with all laws and regulations that apply to IGO.

3. OUR VALUES

Never Stand Still – We are bold, adventurous and excited for the future. We imagine new opportunities and seek new horizons.

Ignite the Spark – We seek, question, innovate and create. We know that without a burning curiosity and bright thinking, we risk missing the really big opportunities.

Be Better Together – We empower, support and respect each other. We act safely and with care, to the strengths of our people.



See Beyond – We know that our actions today will impact the world of tomorrow. We believe our people, community and the environment really matter.

Run through the Sprinklers – We find the fun in what we do. When our workplaces are healthier and happier, we are better.

4. OUR PEOPLE

4.1 Being inclusive and acting with respect

We are committed to providing a safe and inclusive workplace that attracts, retains, and develops the best people.

Each one of us is responsible for fostering an inclusive environment in our business, where differences are valued and everyone is supported and treated with respect.

We will not tolerate bullying, any form of harassment including sexual harassment, discrimination, victimisation or intimidation of any kind or any other type of unwelcome behaviour.

Learn More

Diversity and Equal Employment Opportunity Standard, Discrimination, Harassment and Bullying Procedure, Grievance Resolution Standard and Speak Up Standard

4.2 A safe and healthy workplace

We are committed to providing a safe and healthy place of work and safe systems of work.

All our people have a duty to ensure that they take responsibility for their own actions and work as a team to achieve a workplace in which hazards are appropriately managed. This includes ensuring that you are fit for work every day by not being under the influence of drugs, alcohol or fatigue.

Learn More

Safety and Wellbeing Policy, Risk Management Policy, Mental Health and Wellbeing Strategy and Safety and Wellbeing Risks

5. OUR COMMUNITIES AND ENVIRONMENT

5.1 Working with our communities

We are committed to building and strengthening relationships within the communities in which we live and work.

When working with host communities and Traditional Owners, we expect you to:

- recognise and respect the cultures, customs, lifestyles and heritage of our community stakeholders
- complete IGO's cross cultural training program, as and when required
- ensure compliance with our requirements for engaging with our host communities, including the process for any community donations or investment; and
- consult with your manager if you have any questions about engagement with our host communities.

5.2 Respecting Human Rights

We are committed to upholding the fundamental human rights of all people we engage with in and through our business. We acknowledge the critical role businesses such as ours can play in eradicating modern slavery.



We have a shared responsibility to ensure that we uphold these fundamental human rights, and we expect our people to support and promote a workplace that respects human rights and is without discrimination and harassment.

5.3 Being environmentally responsible

At IGO, we are committed to responsible environmental management. We endeavour to be proactively green and sustainable both in the choice of commodities we seek to develop and how we develop them.

We encourage all our people to be environmentally aware, to understand the potential environmental risks and impacts of our work and to minimise these impacts through responsible management.

Learn More

Stakeholder Policy, Human Rights Policy, Reconciliation Action Plan, Corporate Giving Standard, Anti-Bribery and Corruption Standard, Modern Slavery Statement, Environmental Policy, Climate Change Policy and Group Environmental

6. OUR RELATIONSHIPS

6.1 Avoiding conflicts of interest

It is important that we conduct our business with honesty and in accordance with ethical and legal standards.

We expect all our people to act in IGO's best interests. This means we need to ensure our private interests are not in conflict with those of IGO.

A conflict of interest may occur when your personal interests – family, friendships, financial, or social factors – could have the potential to affect, or could have the appearance of affecting, your judgement, objectivity, or independence to properly fulfil your responsibilities to IGO.

Any actual or potential conflicts of interest must be immediately reported to the appropriate person in accordance with our Conflict of Interest Standard.

6.2 Preventing Bribery, Fraud and Corruption

We have a zero tolerance approach to bribery, fraud and corruption in any form within our business. We have an expectation that all our people will act fairly, honestly, transparently and with accountability. We are committed to complying with all applicable laws and regulations wherever we conduct business.

Gifts, entertainment and hospitality

We recognise that you may have reason to give or accept gifts, entertainment and hospitality in the course of your work for IGO. You must only give or accept appropriate gifts, entertainment and hospitality (including meals) which have a lawful and legitimate business purpose.

Any gifts, entertainment or hospitality should be of moderate value and not give rise to any perceived or actual conflict of interest or undue influence.

The process of giving or accepting gifts, entertainment or hospitality must be in accordance with our Anti-Bribery and Corruption Standard and all offers and acceptances must be declared where the value is in excess of the financial limit set by the Managing Director & CEO.

Learn More

Conflict of Interests Standard and Anti-Bribery and Corruption Standard



7. BUSINESS INTEGRITY

7.1 Responsible communications and market disclosure

As a publicly listed ASX company, IGO is required to provide timely, accurate, consistent, complete and fair disclosures about the business and performance.

Like many businesses, IGO authorises and trains key senior people to speak or release statements on behalf of IGO. Therefore, you may only make public statements or speak on behalf of IGO where you have been given express authorisation to do so.

When using social media we expect you to uphold Our Code and values. It is important that you don't comment on or disclose confidential information obtained through the course of your work, or post anything that may damage IGO's reputation and commercial interests or bring IGO into disrepute.

7.2 Confidential information and intellectual property

You must ensure that any confidential information and intellectual property contained in company records, be it personal information or otherwise, is strictly maintained and not disclosed to any other party within the Company or externally without the approval of management.

Where appropriate, confidential technical or financial information may be disclosed, for example in certain circumstances such as where a confidentiality agreement has been executed between the parties, with the approval of management.

7.3 Trading in shares

While working for IGO, you may learn confidential information about IGO or our related companies. You should never deal in the securities (including shares) of IGO or other listed companies if you have inside information in relation to the company, this is called Insider Trading. Insider Trading is illegal and subject to criminal penalties.

If you are designated a Restricted Person due to your role with IGO, you must ensure you understand the additional restrictions that may be applicable to you.

If you are in any doubt about the meaning of inside information or whether you are free to trade in IGO shares or those of other listed companies, please refer to IGO's Dealing in Securities Standard and/or contact the Company Secretary.

7.4 Protecting company assets and information systems

At IGO, we make information and IT Systems available to our people for the purpose of conducting IGO's business. It is the responsibility of all our people to be vigilant and ensure that IGO's systems and data are secure. You may come into possession of information about IGO, our stakeholders and employees during the course of your work and it is important that you use resources and information appropriately and in accordance with IGO's policies and standards.

Learn More

Continuous Disclosure and Information Standard, Dealing in Securities Standard, Marketing and Corporate Communications Standard, Social Media Standard and Information Technology Security Standard

8. CONSEQUENCES OF BREACH

A breach of Our Code is serious and may have significant reputational, commercial, operational and/or legal consequences for you personally and for IGO. Depending upon the severity of the matter, it may result in disciplinary action for individuals, including termination of employment and/or legal action.



9. SPEAK UP

Delivering on the commitment and spirit of Our Code requires us to have a culture in which it is acceptable to speak up and raise concerns about behaviours that do not align with Our Code.

Our Speak Up Standard is available on IGO's website and our document management system and provides detailed information on how we will deal with any concerns. It also outlines how we protect and support those who speak up and those who are the subject of a speak up report, as well as the legal protections that apply to any individuals who speak up in Australia.

You are encouraged to speak up about any misconduct, anything that you believe to be illegal, unethical or improper, or any breach of Our Code.

IGO will take these concerns seriously, act professionally when our behaviour is challenged and take a strong stance on any proven wrongdoing or breaches of Our Code. Similarly, we will not tolerate retaliation against anyone for raising a concern and speaking up.

SPEAK UP PROTECTION OFFICERS

Joanne McDonald
Company Secretary and Head of Corporate Affairs
E: Joanne.McDonald@igo.com.au T: (08) 9238 8307

Sam Retallack
Head of People and Culture
E: Sam.Retallack@igo.com.au T: (08) 9238 8339

GET IN TOUCH WITH YOUR CALL



1300 790 228
9am - 12am AEST
Monday - Friday



www.yourcall.com.au/report
Available 24/7
Use unique identifier code "IGO"



10. REVIEW

Our Code will be reviewed annually by the IGO Board of Directors to check that it is operating effectively and assess what changes may be required.

11. CONTACT DETAILS

If you have any questions, concerns or feedback about Our Code, you should contact the Company Secretary at: IGO Limited, PO Box 496, South Perth, WA 6951.

Phone: 08 9238 8300

Email: contact@igo.com.au, Attention: the Company Secretary