



## **BUSINESS INTEGRITY POLICY**

## **Our Commitment**

At IGO Limited (**IGO**) we pride ourselves on acting with integrity wherever we do business. Our reputation is built on our Values as a company, the professionalism of our employees and our collective commitment to acting with integrity, honesty, accountability and transparency at all times.

## **Business Integrity**

IGO has developed a Business Integrity compliance framework based on the following principles:

We have a zero-tolerance approach to bribery and corruption. Our interactions with our business partners and all government officials and agencies, whether local, regional, or national, are beyond reproach. We do not give or accept bribes, and we only use appropriate and lawful means when engaging with government officials, our partners, and other stakeholders. Further details are contained with our Anti-Bribery and Corruption Standard.

We do not allow gifts or entertainment to improperly influence our decisions. While giving or receiving gifts or entertainment can be culturally appropriate and part of the normal course of doing business, inappropriately doing so can create the perception of impropriety and may violate anti-bribery and corruption laws. Work-related gifts and entertainment must be entered in IGO's Gift Registry and adhere to the value limits and approval requirements included in the Gifts and Entertainment Standard.

We avoid situations where IGO's interests and our own personal interests conflict or appear to be inconsistent. Potential, perceived and actual conflicts of interest are managed in accordance with our Conflict of Interest Standard.

We maintain truthful and accurate records. We are required by law to keep certain types of financial, safety, environmental compliance, personnel, and other records for certain periods of time. We are committed to mitigating the potential risk of fraud and corruption as we recognise that these risks would have a significant impact on our assets, operations and our reputation. IGO's Fraud Control Plan details how we prevent, detect, resolve and report fraud.

We keep the market informed. We are committed to providing timely, factual and accurate disclosure of material information about IGO. We ensure that material information about IGO is disclosed in a consistent and appropriate manner, and in accordance with applicable laws. We take appropriate measures to protect and prevent the improper disclosure or use of material or confidential information about IGO and are guided by our Continuous Disclosure and Information Standard.

We behave honestly and transparently when dealing in securities. We do not trade in IGO securities or the securities of any other company based on material information that has not been disclosed to the market, and we do not disclose such information to others so that they may trade based on it. Further details are contained with our Dealing in Securities Standard.

We are committed to protecting information that is deemed to be confidential, including personal information. We only collect information that we require and only utilise information for the purpose it was





acquired for. We limit access to confidential information and respond to any unintentional disclosure according to regulatory requirements. Further details can be found in our Data and Information Policy and Privacy Standard.

We only engage with trusted partners. To ensure we can uphold the above principles and protect the interests of our shareholders, IGO conducts risk-based due diligence on third party partners to identify and mitigate risks related to financial irregularities, data security vulnerabilities, operational disruptions, reputational damage, potential conflicts of interest, and other legal, ethical, and compliance issues.

## Responsibility

This Policy applies to all directors, officers, employees, contractors and consultants of IGO or any entity that is controlled or managed by IGO. It is applicable to all sites and in all phases of the mine life cycle including exploration, design, construction, operation and closure.

Ivan Vella Managing Director and CEO IGO Limited