



Code of Conduct

Creating value through opportunity

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Message from our CEO



Our purpose of creating value through opportunity captures the essence of Sandfire's journey to date as well as our aspiration to build an international diversified and sustainable mining company.

I am incredibly proud of the company Sandfire has become. Strong, effective governance, in combination with living our core values is the cornerstone of our company and ensures we adhere to the highest standards of responsible business practices regardless of where we operate.

At the heart of our approach is our Code of Conduct (**Code**). Our Code guides our behaviour and brings Our Values to life. We use Our Values and Code to drive the best possible outcomes for everyone. It supports our strong commitment to treat each other with respect, to be open and transparent, to operate in a socially and environmentally responsible manner, and to make meaningful contributions everywhere we operate.

As a team, we always endeavor for excellence in everything we do; in our people, we value innovation, hard work and diligence; and in our approach to business, we always champion responsible business practices.

We have an exciting future with many fantastic opportunities. As we embark on these endeavors, I encourage you to adopt and live our Code in your everyday work and decision making. Wherever these opportunities take us, our Code and Values will continue to operate and ensure that we hold ourselves accountable to the high standards which make Sandfire what it is today.



Karl Simich
Managing Director and Chief Executive Officer
Sandfire

Our Values

Our Code of Conduct is based on Our Values. They are part of every decision we make and guide all who work for us in their day-to-day dealings with each other. Our Values, and how to live them, are set out below.



Honesty



Living our Values

- Act with integrity in all your dealings
- Be open to feedback and viewpoints
- Speak up, be authentic and talk straight
- Ensure that we do as we say



Not living our Values

- Avoid the hard issues
- Deny and excuse
- Information isn't shared



Respect



Living our Values

- Empower and trust each other
- Value diversity and act inclusively
- Understand and respect the communities in which we operate
- Use real words so we communicate effectively
- Respect the reputation we've earned and our social license to operate



Not living our Values

- Other opinions aren't welcome or are ignored
- It has to happen my way



Collaboration



Living our Values

- Put the company first and work for the shared purpose
- Collaborate within and across teams
- Be open to new information, ideas and approaches
- Invest the time and effort to build strength in your relationships
- Engage with and value team members
- Be curious – ask questions, challenge, explore and think together



Not living our Values

- Prioritise own success
- Not interested in asking "why?"
- Oppositional
- Create hurdles rather than enable others
- Disregard feedback

Desired Outcomes

- We are **proud of what we do**, how we operate and the positive impacts.
- We **live our values** committed to acting respectfully and with integrity across all stakeholders.
- Our diverse and inclusive culture contributes to our successes and enables a **sense of belonging and pride**.



We strive to build a culture that embraces company values, teamwork, reward for performance and **encouraging regular communication and feedback.**



Accountability



Living our Values

- Don't Walk Past – Safety, Cultural, Operational or Strategic Risks
- Own our tasks, successes and our mistakes – and learn to improve
- Be dependable in delivering in your role
- Take responsibility for your priorities, choices, actions and behaviours



Performance



Living our Values

- Excel in planning and execution to drive safety and profitability
- Bring energy and resilience to your work
- Deliver on our shared goals
- Be agile and adaptable when circumstances change
- Get clear on our performance targets



Not living our Values

- Its not my responsibility
- Deflect failure with blame
- Condone poor behaviour
- Do not solve problems constructively



Not living our Values

- Good enough is fine
- Don't offer solutions or engage in problem solving
- Unreliable and avoid commitment

Desired Outcomes

- We **deliver** on our commitments and responsibilities together.
- Our **fit for purpose** approach drives excellence, ownership, productive, growth and development.
- We are committed to achieving **sustainable and profitable** operations.

Our Code of Conduct

Our Code, together with our Values, guide our behaviour.

The Code represents our commitment to conduct our business in accordance with Our Values. It sets out the standards of conduct you can expect from Sandfire, and those we expect from you.

We are all equally responsible for ensuring our culture is reinforced and that Our Values are upheld. Inherent in our approach is our philosophy of **Don't Walk Past**. We expect that you **Don't Walk Past** any behaviour you know or perceive is contrary to Our Values because the standard that you walk past is the standard you accept. You should always feel comfortable in speaking up if there is something you do not understand or have concerns about.

In many cases, a breach of this Code may also constitute a breach of the law. Sandfire is committed to full compliance with the law and we expect that everyone who conducts work for Sandfire understands and complies with the laws and regulations that are appropriate to their job.

Our Code is widely available so everyone can understand our conduct standards. It applies to all of our people including Directors, executive management, employees and contractor staff.

The Code of Conduct is reviewed every two years or when there is a significant change to the business, to ensure it remains current and relevant to the business and regulatory environment in which we operate.

Our Code has been approved by the Board of Directors in July 2021.

Don't Walk Past

If you see something that makes you feel uncomfortable - **Don't Walk Past!**

We all have a responsibility to voice our concerns if we suspect a decision or an action does not adhere to our Code or goes against Our Values. You do not need to be directly affected by an issue to raise it.

How to uphold our Code

Understand and apply our Code into the way you work and decision-making. As an international company, we must all respect and work in accordance with applicable laws and regulations of the countries where we operate. We must follow all our applicable policies, standards, procedures and processes relevant to our work for Sandfire.

If you are in a managerial role, you have an additional duty of care to reinforce the Code through visible leadership.

We expect managers to:

- Provide an inclusive workplace where employees feel comfortable and safe raising concerns without fear of reprisal
- Recognise and celebrate employees for living Our Values
- Ensure your people understand the Code
- Never dismiss or ignore a concern that is raised and treat all concerns seriously
- Ensure accountability if the Code is not being followed.

How to raise concerns

You can raise concerns to your line manager. If you feel uncomfortable raising business conduct concerns with your line manager, you can also raise your concerns to:

- A Human Resources (HR) representative
- A member of the executive team (ExCo) or the Board
- Sandfire's Whistleblower Protection Officer
- Sandfire's Head of Legal and Procurement
- Sandfire's Anti-Bribery and Corruption Officers

Within the above avenues, you can seek to remain anonymous during the investigation.

You can also raise concerns through the whistleblower helpline, which provides full anonymity and confidentiality.

What is the whistleblower helpline?

Sandfire's whistleblower helpline is an independent and confidential service run by a third-party, which can be used to report breaches or to raise concerns if people do not feel comfortable using internal channels.

It can be accessed via the website, email or by phone and you may choose to remain anonymous. The helpline is available 24-hours a day.

The service is available to all people who work with Sandfire, including contractors and suppliers, without fear of reprisal.

Details:

- Secure email – sandfire@stopline.com.au
- Website – <http://sandfire.stoplinereport.com/>
- Phone – **1300 30 45 50** (within Australia)
+61 3 9811 3275 (outside Australia)

If you ever have a question or are unsure what to do, ask for help from your line manager or the HR team.

You can also use the **Quick Test** outlined at Page 8.

How do those who receive concerns respond?

We expect that those who you raise your concern to will:

- listen, respond respectfully and promptly, and treat every concern seriously;
- protect the identity of the reporter (as needed) who raised the concern; and
- seek advice from HR, legal or governance on the next steps and the investigation process.

How are reported concerns investigated?

All potential breaches will be investigated to determine whether they can be substantiated. In some cases, advice, support or guidance is all that is needed to resolve your concern, whereas in other instances, an investigation is required.

The HR team, Legal team and/or governance team will assemble an appropriate group to lead the investigation.

Retaliation against those involved in reporting is prohibited and immediate action will be taken if it occurs.

Confidentiality: Sandfire will strive to protect the identity of the person reporting the concern, and any others who are involved in the potential issue. Measures will be put in place to protect your identity as needed. If you participate in or learn about an investigation, you must keep it confidential.

Independence: Investigators are independent from the concerns reported and may include (for example) Human Resources, Legal, Corporate Affairs representatives and/or, if necessary, external independent experts.

Implicated persons: We may be required to inform a person who has been implicated in a complaint.

Closing a raised concern case

Once the outcome of the investigation is finalised and any necessary consequence determined, all relevant people will be updated as necessary, subject to confidentiality and privacy.

All material breaches of the Code are reported to the Board.

Consequences for breaching our Code

A breach of our Code is serious and may have significant reputational, commercial, operational and/or legal consequences.

It may result in:

- Disciplinary action up to termination of employment
- Termination of Third Party services
- Legal action (for example, Sandfire may sue to recover stolen company assets or money)
- Criminal and/or civil penalties or fines with the misconduct being reported to law enforcement authorities
- Exclusion from tendering or access to private contracts.

Don't Walk Past and report any concerns or suspected breaches of our Code of Conduct via any of the options outlined.

Sandfire prohibits retaliation against anyone who raises a concern. This applies to all forms of retaliation, including (but not limited to) verbal, physical or online threats, discipline, punishment, job or shift reassignment. Retaliation is a serious offence that can be grounds for dismissal.

If you feel that you have experienced retaliation as a result of raising a concern, you must report this immediately to any of the following people;

- A HR representative
- Sandfire's Whistleblower Protection Officer (Head of HSEC)
- A member of the executive team (ExCo) or the Board
- Sandfire's Head of Legal and Procurement

The Quick Test

We support the 'Don't Walk Past' way of thinking and equally encourage you to acknowledge when you see someone living and demonstrating Our Values.

Use our Quick Test to make good decisions if you are not sure what to do, or are in doubt about whether you should speak up.

1



Is it **safe**?

2



Does it fit with Sandfire's **Values**?

3



Is it **legal** and in accordance with our standards?



Health & Safety

Our most important measure of success is that every person who works with us remains safe and healthy at the end of each day.

Health and Safety

With Our Values guiding us, we must:

- **Work safely and prevent workplace injuries and illnesses.**
All our people, including contractors and visitors, must be aware of and comply with our health and safety standards, procedures and practices.

All work must be well designed before commencing it. Risks must be assessed, and controls implemented and verified before high-risk work commences.
- **Demonstrate care through displaying safety leadership.**
We expect managers to be accountable for implementation of safety standards and procedures, and for displaying visible leadership.
- **Be fit for work every day.**
All our people, including contractors and visitors, must be well rested, physically and mentally fit, and not under the influence of drugs or alcohol.
- **Stop work and report if you consider the task unsafe.**
- **Don't Walk Past if the health or safety of anyone is at risk.**

Wellbeing

We believe that there is more to ensuring our people's wellbeing than simply preventing injuries. We strive to create and maintain a safe and healthy working environment. We want all who work for us to return home fit and well and remain so during the course of their working lives.

We are governed by legislation and codes of practice and have systems in place to identify and manage health hazards. We expect that everyone follows relevant policies and procedures.

We actively support the promotion of a healthy lifestyle and mental wellbeing.

We also understand that non-work related pressures and stresses can impact a person's wellbeing and we work to foster an environment where people feel safe, a sense of belonging and supported.



Learn More

[Health & Safety Policy](#)

[Our People Policy](#)

Find out more about our health and safety initiatives and performance through our reporting available on our [website](#).



Other Resources

Employee Assistance Program (EAP)

Available to our Australian based employees.

Inclusion, diversity and equity in our workplace

Our people are our greatest asset. We value the importance of building and maintaining an inclusive and diverse workplace where everyone is valued and empowered to achieve their full potential. We believe that the diverse backgrounds and experiences of our employees positively contributes to our culture and the strategic outcomes of the business.

With Our Values guiding us, we must:

- Be inclusive, understanding and co-operate with one another
- Know what is required to do our job
- Treat others fairly, with respect and dignity, and without discrimination based on race, gender, age, nationality, marital status, ethnic origin, social class, religion, political views, sexual orientation or disability
- Support each other to report and **Don't Walk Past**
- Always consider the implications of our conduct.

We recruit our people in accordance with Our Values and based on merit. We don't tolerate any form of discrimination. We expect that all who work for us will treat each other with fairness, dignity and respect. Every person should feel they have the opportunity to realise their full potential and contribute to Sandfire's success.

We don't tolerate bullying, harassment, discrimination, victimisation or intimidation of any kind towards others –

whether in person, via email, phone, social media or other type of behaviour that creates a hostile or intimidating work environment. If you believe you are being bullied or harassed, we encourage you to respectfully ask the person who is triggering this feeling to stop. If you do not feel comfortable doing this, or previous attempts have been unsuccessful, you can speak to your manager or a member of the HR team or with someone from the Whistleblower helpline.

We are committed to

- Fostering a culture of diversity and inclusion, where differences are valued, and everyone is welcomed and treated with respect.
- Developing appropriate leadership, talent management, training and mentoring programs to assist in achieving a broader and more diverse pool of employees, that embraces difference and develops all members of the workforce to contribute to the best of their ability.

Bullying is repeated unreasonable verbal, physical, social or psychological behaviours directed towards an individual or group of people at work.

Harassment is an action or behaviour viewed as unwelcome, humiliating, intimidating or offensive by the recipient.

Sexual harassment includes unwanted or unwelcome sexual advances or obscene remarks viewed as unwelcome, humiliating, intimidating or offensive by the recipient.

Victimisation occurs where you are treated unfairly, intimidated or punished for raising a concern about misconduct in the workplace (e.g. discrimination or harassment) or supporting someone for raising such a concern.



Learn More

[Diversity and Inclusion Policy](#)

[Our People Policy](#)



Other Resources

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Available to our Australian based employees.

Whistleblower Helpline

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- Website – <http://sandfire.stoplinereport.com/>

- Phone – **1300 30 45 50** (within Australia)

+61 3 9811 3275 (outside Australia)

Respecting human rights

We are committed to upholding the fundamental human rights of our employees, the communities in which we operate, those within our supply chains and other stakeholders who may be impacted by our business activities.

With Our Values guiding us, we expect our people to:

- Champion and promote a workplace culture that encourages responsible business practices to uphold fundamental human rights in our business activities.
- Conduct business in accordance with applicable laws and our human rights standards.

We are committed to

- Undertaking human rights risk assessments of our business activities to identify and address potential human rights impacts.
- Acknowledging and respecting the rights, culture, connection to land, language and traditions of Indigenous peoples.
- Having respectful and transparent engagement with the communities in which we operate.
- Establishing and promoting open, accessible and transparent reporting mechanisms for employees, suppliers or other stakeholders to report identified or suspected human rights concerns.
- Ensuring compliance with relevant legislation, including the requirements of Australia's Modern Slavery Act 2018.

Communities

We are committed to delivering a lasting, positive contribution to the communities where we operate.

With Our Values guiding us, we are responsible for:

- Establishing collaborative and respectful relationships with communities impacted by our activities through transparent, equitable and inclusive dialogue.
- Ensuring our communities are appropriately informed prior to the commencement of our activities or operations and the appropriate consents have been provided before any access is undertaken.
- Contributing to economic development through a combination of local procurement and employment.
- Providing access to accessible and transparent grievance reporting mechanisms.

We are committed to

- Recognising and respecting the cultures, customs, lifestyles and heritage of our community stakeholders.
- Following our requirements for dealing with host communities, including pre-approval requirements before proceeding with any community donation or investment.
- Complying with laws relevant to the jurisdictions in which we operate. In situations where there is a discrepancy between domestic legislation and Sandfire's policy, we endeavor to uphold the higher standard.



Learn More

[Human Rights Policy](#)

[Community Policy](#)

[Anti-Bribery and Corruption Policy](#)



Other Resources

See our [website](#) for our latest [Modern Slavery Statement](#). Our annual Modern Slavery Statement outlines our commitment to identifying and addressing any modern slavery risks in our operations and supply chain.

If you become aware of any conduct (including that of any of our People, a Supplier, third party or other individual) which you believe might be violating another person's human right, **Don't Walk Past and report it.**

Being environmentally responsible

We are committed to environmentally responsible management of our facilities and activities. We seek to minimise our impact on the environment by integrating environmental considerations into our exploration, development, operation, mine closure and rehabilitation activities.

We encourage you to find a way to minimise impacts to the environment in the work that you do and welcome innovative ideas to do things better.

With Our Values guiding us, we are all responsible for:

- Being environmentally aware.
- Complying with applicable environmental laws and regulations.
- Understanding the potential environmental risks and impacts of our work and minimising our footprint, including in relation to biodiversity, waste, water, tailings and emissions.
- Reporting actual or potential environmental incidents.
- Recognising the complex global challenge posed by climate change and acknowledging that we have a responsibility to minimise our emissions and build our resilience to climate-related impacts.
- Making sure our Suppliers (including contractors) respect and work in accordance with our environmental requirements and commitments.

Protecting privacy

We are committed to respecting individual privacy and ensuring that personal information is handled appropriately and lawfully.

We collect, manage and use personal information in accordance with our Privacy Policy and applicable privacy laws.

If we need to share personal information with third parties, we take reasonable steps to ensure that they also manage the information appropriately and keep it secure.

We respect the privacy of individuals and comply with all applicable laws on collection, use, retention, transfer and deletion of personal information.

We expect that you read and understand Sandfire's Privacy Policy and understand the procedures around personal information.

We may monitor employee use of information systems, and access to electronic systems. Information on our computers and within emails can be accessed for legal reasons and you should consider this before sending an email.

Our people must:

- Follow our Privacy Policy and applicable standards and procedures as relevant to their role, when managing any personal information; and
- Promptly inform our Privacy Officer of any incident involving unauthorised access to, disclosure of, or loss of personal information held by Sandfire.

You can also direct any questions or issues about how Sandfire manages personal information (including any requests for access to personal information held by Sandfire) to our Privacy Officer.



Learn More

[Environmental Policy](#)

[Privacy Policy](#)



Other Resources

Find out more about our environment management and performance, including our approach to climate change on our [website](#) or in our [Annual and Sustainability Reports](#).

No bribery or other corrupt conduct

We are committed to fostering a culture of compliance, ethical behaviour and good corporate governance. Sandfire values respect and integrity and has zero tolerance for corruption or bribery in any form and is committed to complying with all applicable laws and regulations of the countries in which we operate.

Sandfire and its personnel must not:

- Offer or give bribes, directly or indirectly (for example, through an agent or intermediary), to a Government Official or any other person.
- Never accept or ask for bribes, or any other favour, from anyone (such as a Supplier) as a reward to do your job or encourage you to act improperly.
- Make facilitation payments, even if small or customary, give Secret Commissions, kick-backs or engage in money laundering.
- Never give or receive anything of value if others could perceive such conduct as improper under the circumstances.

Only offer, give or accept appropriate gifts, entertainment and hospitality (including meals) which have a lawful and legitimate business purpose. The process must comply with the financial limit on gifts, entertainment or hospitality that can be accepted or offered as set by the Board and detailed in the Company's Authority Limits. All offers and acceptance of gifts must be declared and recorded in accordance with the Company's Conflict of Interest procedures.

If you have any questions, please contact the ABC Officer.

No insider trading

While performing your job you may learn confidential insider information about Sandfire or other companies. Where you have inside information in respect of Sandfire or another listed company, you must not deal in the securities of that company, as this is called **Insider Trading**.

It is also a criminal offence to encourage Insider Trading or to disclose Inside Information with a view to others profiting from it. For more information, refer to [Sandfire's Securities Trading Policy](#).

Communicating Externally and acting as a Company Representative

You may be asked to make public disclosures on behalf of Sandfire, including in the form of interviews, speeches, articles and reports. As a publicly listed ASX company, Sandfire is subject to listing rules which require us to provide timely, accurate, consistent, complete and fair disclosure. This enables our shareholders to make informed decisions.

Sandfire has appointed authorised representatives to make these disclosures. If you are nominated you can expect to receive appropriate training and further detail on your duties.

Only our authorised people can appropriately disclose information publicly or speak on Sandfire's behalf. This must occur in accordance with our [Disclosure Policy](#) including related standards and procedures.

If you have any questions or are unsure, speak to the Company Secretary.

We support our people presenting at events and believe this is a great opportunity for you to network, showcase your skills and develop yourself. We expect that you will do so in a professional manner.

Facilitation Payment means a payment or other inducement (including a benefit in kind) provided to a Government Official to secure or expedite a routine government action which the Government Official is already ordinarily obliged to perform. This might include (but is not limited to) payments to expedite the issuing or processing of legitimate visas, the scheduling of inspections, obtaining permits and authorisations, seeking the grant, retention or extension of mining tenure, or the connection of telephones or other utility services.

Corruption means an act, promise or omission for an improper or lawful purpose, which involves the abuse of a position of trust or power.

Bribe means a benefit offered, promised or provided to a Government Official or other person in order to gain or improperly influence (by illegal, unethical or dishonest means) any advantage that is not legitimately due (including any commercial, contractual, regulatory, business or personal advantage).

Insider information refers to price sensitive information about a company that is not available to the market and if it were known has the potential to influence investment decisions and can have a significant effect on a company's share price.



Learn More

[Anti-Bribery and Corruption Policy](#)

[Securities Trading Policy](#)

[Disclosure Policy](#)

Avoiding conflicts of interest

We expect you to always act in the best interests of Sandfire and to not be in conflict with those interests.

Identifying Conflicts

You have a responsibility to act honestly, to identify and then disclose a situation involving an actual, potential or perceived conflict of interest.

Ask yourself – could your conduct be perceived as creating an incentive for you, or your family, close friends or a business associate at Sandfire's expense?

If **“YES”**, the conduct you are considering is likely to create a conflict of interest.

Avoid Conflicts

At all times, whether on the job or in your personal time, nothing you do should conflict with your responsibilities to Sandfire.

Always declare and resolve your conflict

You must not involve yourself in situations where there is a conflict of interest (actual or perceived). Conflicts of interest are likely to arise from time to time. Of themselves, they do not constitute a breach of Sandfire's Code of Conduct, as long as they are properly disclosed and managed.

You must declare all conflict of interest (actual or perceived) in accordance with Sandfire's Company Authority Limits and related conflicts of interest procedures as they apply to the region where you work.

Please ask your line manager or contact the Corporate Affairs team if you are unsure about a potential or perceived conflict.

The expectations of our Suppliers and their supply chains is set out in our Supplier Code of Conduct. Suppliers are to avoid all conflicts of interest that may arise in performing work for us and in related business decisions. Our Suppliers must declare any conflict of interest to Sandfire, and where appropriate, obtain Sandfire's consent before proceeding if there is or may be a perceived conflict between their obligations to Sandfire and those to another party.

A **Conflict of Interest** is a situation where your role or relationship with Sandfire or financial or other personal considerations or interests have the potential to affect, or could have the appearance of affecting, your judgment, objectivity or independence to properly fulfil your responsibilities to Sandfire.



Learn More

[Supplier Code of Conduct](#)

Using suppliers with integrity

We work towards effective, fair, equitable and streamlined procurement processes, including related decision-making, with our Suppliers.

We aim to only work with Suppliers who:

- Have strong values and standards of conduct; and
- Share our commitment to lawful business practices because their actions can directly impact our financial performance and reputation.

Our Supplier Code of Conduct sets out the behaviours and business practices we expect of our suppliers and complements the contractual arrangements we have with our suppliers. We expect that our suppliers communicate and, to the extent possible, apply the principles of the Supplier Code to their supply chains.

Engaging and managing a supplier

If your role involves engaging a Supplier, you must do so in accordance with our relevant policies, standards and procedures. This includes clearly informing them of our expectations, standards and applicable requirements.

As set out in our Anti-Bribery and Corruption Policy, Sandfire Personnel must conduct due diligence and relevant searches, among other checks, to verify the past and current behaviours of such Third Parties. Sandfire Personnel should refer to the Company's Contracting and Procurement standards and procedures for details.

All procurement decisions should be based on best value received, taking into account the merits of price, quality, performance, history and suitability to meet Sandfire requirements.

In managing the performance of a Supplier, you must ensure they are assessed and appropriately monitored, including carefully checking their invoices.

You must hold our Suppliers accountable for any conduct inconsistent with our Code.

Our expectations of suppliers

Our Suppliers must comply with lawful business practices and applicable Sandfire policies, standards, procedures and processes, as relevant to the work they are performing for or on our behalf.

Performance or misconduct concerns

If you have a concern about an existing or potential Supplier's integrity or ability to perform an engagement, Don't Walk Past so we can address any issues immediately.

Equally, our Suppliers can report a misconduct concern with a member of our Supply team or confidentially to our Whistleblower helpline.

A **Supplier** is any third party that Sandfire engages to provide goods and or services, such as vendors, consultants, contractors as well as third party representatives who interact with external parties on Sandfire's behalf.

Examples of Suppliers who may act on our behalf include customs or visa agents, freight forwarders, brokers, intermediaries and travel agents.



Learn More

[Supplier Code of Conduct](#)

[Human Rights Policy](#)

[Anti-Bribery and Corruption Policy](#)

Other Resources

See our suppliers section on our [website](#).

Protecting company assets, including information and data

Together, we must protect our Company Assets, including Confidential Information and Intellectual Property, and use them only for their intended purpose.

We also prohibit falsifying, stealing, concealing or otherwise tampering with company information and data.

Protect company assets

- You must only use Company Assets for legitimate business purposes as required by your role and for the sole benefit of Sandfire. Protect all assets against damage, misuse, loss or theft.

Your use, including any disposal, of Company Assets must follow applicable policies, standards and procedures.

Occasional personal use of Sandfire's email, internet and telephone system is permitted provided it doesn't interfere with your work duties or Sandfire information systems. Never take any action that undermines the integrity of our data and systems.
- Your use of Company Assets may be monitored and blocked at the discretion of Sandfire. Inappropriate use of Company Assets may lead to disciplinary consequences, including civil and/or criminal action.
- Any unusual or suspicious activity affecting Sandfire technology assets that you become aware of must be immediately notified to your line manager and the Sandfire IT team.
- At the end of your employment or involvement with Sandfire, you must return all Company Assets.

Ensure complete and accurate company information and data

- Our People must create and keep true and accurate records of all financial and non-financial company transactions and data in accordance with our policies, procedures, and applicable laws and regulations.
- All financial transactions and information (such as purchase orders, invoices, travel and expense records, journal and tax filings) must be evidenced by appropriate source documents, verified for their validity and accuracy.

Ensure appropriate and properly authorised public disclosure of information

- Only our authorised personnel can appropriately disclose information publicly or speak on Sandfire's behalf. This must occur in accordance with our Disclosure Policy including related standards and procedures.

Protect Confidential Information (CI) and Intellectual Property (IP)

- Only use CI as required in your role. You must keep it confidential and dispose of it in accordance with our applicable policies, standards and procedures. Also see the Protecting Privacy section of this Code and our [Privacy Policy](#).
- Protect all CI and IP used by Sandfire (whether it belongs to Sandfire or to a third party) from unauthorised use. Also take care not to disclose CI in an unauthorised way.
- Notify your line manager and our Legal team if you believe you have created new IP and follow applicable standards and procedures so that Sandfire's interest in that IP can be protected.



Learn More

[Privacy Policy](#)

[Disclosure Policy](#)

Complying with economic sanctions

Being an international business, we comply with applicable economic sanctions.

Economic Sanctions

If your role involves negotiating, facilitating or finalising a transaction with a new or existing Counterparty, you must follow our sanctions compliance due diligence and related screening processes and procedures to ensure we don't:

- export to, or through, a sanctioned country;
- use or charter ships of sanctioned parties;
- import or have dealings in products, materials or other property originating from a sanctioned country; and
- otherwise enter into transactions (including financial transactions) with sanctioned parties.

We expect Counterparties who we propose to transact with to provide complete and accurate information as required by our governance and compliance processes.

Contact our Legal team immediately if you become aware of an economic sanctions 'red flag' or potential breach of sanctions laws.

Economic sanctions are commercial and financial penalties (such as travel bans, asset freezes, arms embargoes, foreign aid reductions and trade restrictions) imposed by one or more governments to protect national security and foreign policy interests.

They prohibit business with certain countries ("**sanctioned countries**"), as well as with certain individuals and entities (including banks) and companies owned or controlled by such individuals and entities ("**sanctioned parties**").

There are significant penalties for breaching applicable economic sanctions.

A **Counterparty** is any party with whom Sandfire conducts business, including customers, suppliers, agents, distributors, resellers, financial institutions or banks.



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