



ALKANE
RESOURCES LTD

Code of Conduct

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This Code of Conduct (Code) applies to everyone who works for Alkane Resources Limited and its subsidiaries (Alkane), including our directors, officers, employees, contractors and service providers (collectively referred to as “you”).

The Code sets out the standards of conduct and behaviour that Alkane expects and requires of you, based on our values and the law. It applies to you whenever you are identified as a representative of Alkane, including when you are outside your workplace or working hours.

You are responsible for ensuring that you read and understand the requirements of the Code. If anything is unclear, you should ask for help.

Alkane takes compliance with the Code seriously. Any suspected breaches of the Code will be investigated and if you are found to have breached the Code, you may face disciplinary action including termination of your employment. If the situation involves a breach of law or other regulation, it may also be referred to the appropriate regulatory body.

If you see or suspect a breach of the Code, even if you’re not sure, it is your duty to report it. Section 5 of the Code explains how to report concerns and how Alkane will protect you from any retaliation for raising genuine concerns.

The Code should be read in conjunction with other important policies which are relevant to upholding the Code, including those referenced in this document.

1 Our values

Alkane's core values include integrity, respect, transparency and performance. When you are conducting business and dealing with suppliers, colleagues, and other stakeholders, you must:

- act with honesty, integrity and professionalism
- treat others fairly and with respect
- perform your duties with skill, honesty, care, and diligence
- be careful and responsible when using company information, funds, equipment, and facilities
- promote the interests of Alkane and avoid situations where your personal interests could conflict with Alkane's interests
- follow Alkane's policies, procedures and lawful instructions
- comply with all applicable laws and regulations
- demonstrate behaviours that align to the Alkane values

2 Working together

Health, Safety and Environment

The safety of our people and the protection of the environment is our highest priority and fundamental in Alkane's daily operation and the way we work. We expect you to take responsibility for your own health and safety at work, as well as the health and safety of those people you work with. You must:

- be aware of the health and safety requirements of your role
- comply with all of Alkane's health, safety and environmental policies, standards and procedures and any related instructions
- immediately take action if you become aware of a hazard
- report any health, safety or environmental issues immediately
- take whatever action is necessary to protect the safety of our people and environment, including pausing work where you identify something that may be unsafe or harmful
- come to work fit for duty and not impaired by illness, fatigue, alcohol and/or drugs

Communities

Alkane operates in close proximity and with the consent of its local communities. When interacting with our local communities, you must:

- be respectful and courteous
- use constructive and inclusive language
- not engage in abusive, offensive, hostile, or aggressive behaviour
- not use language that may cause offence

- not damage community or private property
- follow local laws and rules
- avoid anything that could harm Alkane's reputation or relationship with its local communities

Inclusion and Diversity

Alkane is committed to growing an inclusive and diverse workforce where every person is treated fairly and with respect. We want everyone to be able to contribute to Alkane's success and reach their full potential. Alkane invests in its people, systems and policies to support inclusion and diversity, and expects everyone to work together to create an inclusive culture.

Harassment, Sexual Harassment, Bullying and Discrimination

Harassment, sexual harassment, bullying or discrimination of any kind is not acceptable in our workplace.

You must never engage in these behaviours and must ensure that you are familiar, and comply, with Alkane's policies and procedures in this regard, particularly the [Sexual Harassment, Bullying and Discrimination Policy](#).

You can help create a positive environment by supporting each other and making sure no one is treated unfairly. If you see or suspect harassment, bullying, discrimination, or any other unacceptable behaviour, you are expected to report it.

3 Acting with integrity

Conflicts of Interest

You must avoid situations where your personal, financial or other interests could conflict with your duties and obligations to Alkane.

If you think something may give rise to an actual, potential or perceived conflict of interest you must promptly tell your direct manager or an appropriate senior manager. If a manager receives a report of a conflict and is unsure what action is required, they should contact the General Counsel or Company Secretary.

Bribery and Corruption

You must ensure you are familiar with, and at all times comply with, Alkane's [Anti-Bribery and Corruption Policy](#). In particular, you must never offer, promise, give, demand, or accept a benefit (including money, gifts, favours, hospitality or anything else of value), whether directly or indirectly,

to or from anyone (including public officials, political candidates, political parties, community leaders or private sector employees) in order to influence a person and/or gain an improper advantage.

Gifts and Hospitality

Alkane recognises that offering or accepting gifts and entertainment of moderate value are generally considered to be in accordance with business practice and maintaining good business relationships. However, the exchange of gifts and entertainment may give rise to conflicts between your interests and the interests of Alkane.

In accordance with our [Anti-Bribery and Corruption Policy](#), you must not offer or accept gifts or entertainment in circumstances which could give rise to, or appear to give rise to, a conflict of interest.

You must not offer, give or accept a gift or entertainment with a value exceeding AUD\$500 per person unless you have reported the proposed gift or entertainment to the Company Secretary and received approval to do so. Any gift or entertainment with a value over AUD\$500 that is given or accepted must immediately be reported to the Company Secretary so that such gifts or entertainment can be recorded in the Gifts and Entertainment Register.

Charitable Contributions and Sponsorship

You must not make or offer any charitable contribution, donation or sponsorship (including, for example, community investment projects) on behalf of Alkane without prior approval from the Chief Financial Officer.

Insider Trading and Trading in Alkane Securities

Inside information is any information that is not generally or publicly available and, if it were, a reasonable person would expect it to materially affect the price or value of a company's securities. It is unlawful to buy, sell or otherwise deal in securities where you have inside information. It is also unlawful to encourage someone else to deal in the securities or to pass the inside information to someone you know who may use the information to buy or sell the securities. This behaviour is commonly referred to as 'insider trading.'

In the course of your job, you may learn of inside information relating to Alkane or other companies. You should never deal in the securities of Alkane or other listed entities if you have inside information in relation to those securities.

There are also additional restrictions on trading in Alkane securities under our [Securities Trading Policy](#). It is also important that you are aware of the [Securities Trading Policy](#) and comply with it at all times.

4 Protecting Alkane's assets

Property

You are provided with access to Alkane's equipment, systems, buildings and services to enable you to do your job. Alkane's property, funds, tools, equipment, vehicles, facilities, and services must be used only for authorised purposes and not for personal benefit.

Personal Information and Privacy

Alkane is committed to complying with laws governing privacy of personal information and protecting and safeguarding the privacy of people who deal with Alkane. All personal information that we collect must be used, stored, handled and updated in accordance with [Alkane's Privacy Policy](#).

You must ensure you are aware of, and comply with, our [Privacy Policy](#) when you are managing any personal information. You must also promptly report to the Company Secretary any incident involving unauthorised access to, disclosure of, or loss of personal information held by Alkane.

If you have any queries in relation to your obligations, you should contact the Company Secretary, who is Alkane's nominated Privacy Officer.

Confidential Information and Intellectual Property

Alkane's competitively sensitive and proprietary information must be protected from unauthorised use or disclosure. You should not share any of this kind of information with anyone unless you are authorised to do so. If you are not sure what you can share, you should ask your supervisor or manager.

You should also keep confidential the information you come across in dealings with customers, suppliers, and other third parties.

Your obligations of confidentiality to Alkane continue even if you leave Alkane.

Unless governed by law or otherwise agreed in writing, any intellectual property developed by you during or as a result of your employment with Alkane is the sole property of Alkane.

Communicating Externally

Alkane's relationships with investors, the community and the media will primarily be managed by the Managing Director or their delegate.

It is important that Alkane's public disclosures are only made by authorised spokespersons. Unless the Managing Director or their delegate has authorised you to do so, you must not represent

Alkane externally, act as a spokesperson for Alkane or comment to the media or in any social media platform on behalf of Alkane.

You should carefully consider your presence online and ensure that you do not represent Alkane through your personal channels and that your social media activity does not damage or harm Alkane's reputation.

5 Speaking up

Alkane upholds a commitment to a work environment free of unethical, unlawful, or undesirable conduct or practices.

You must report any behaviour or situation that you think breaches or potentially breaches the Code. For most matters, you should report the issue to your supervisor. If for any reason you do not feel comfortable reporting the matter to your supervisor, you can report it to your Human Resources Manager, the General Counsel or by using the mechanism provided under the [Whistleblower Policy](#).

All reports will be treated as confidential and anyone who, in good faith, makes a report about an alleged breach of the Code will not be disadvantaged or prejudiced in the making of such a report in accordance with the [Whistleblower Policy](#).

6 Waivers of the code

Any waiver of this Code for directors or members of senior management may be made only by the Board (or a committee of the Board to whom that authority has been delegated) and will be disclosed promptly if required by law or stock exchange regulation.