

SUPPLIER CODE OF CONDUCT

Introduction

Metro Mining (“**Metro**”) chooses to work with Suppliers who share and respect our Values and work with us to do business responsibly and ethically.

This Supplier Code of Conduct (“**Supplier CoC**”) sets out how we expect our Suppliers to work with us. It applies to all Suppliers (which includes any suppliers, vendors, contractors, consultants, agents and other providers of goods and services who seek to do business with Metro) and their employees, contractors and sub-contractors (**‘You’**).

As a Supplier of goods and / or services to Metro, we expect You will:

- work ethically, safely and responsibly
- understand our Supplier CoC and put it into daily practice when You work with us
- ask Metro for clarity if our Supplier CoC does not provide sufficient guidance
- follow all applicable Metro policies, standards, site procedures, contractual agreements and conditions when You’re working at a Metro site
- comply with all laws, regulations, standards and sanctions that apply to your work
- report breaches of our Supplier CoC to Metro
- cooperate with any investigation, assurance activity, audit or inquiry related to our Supplier CoC or your contract as directed by Metro.

What we value

When You are working with us, we expect that your actions will align with our Values.



Fairness and Respect

At Metro we care for and respect each other. Everyone should be treated fairly and feel safe and respected at work.

We expect You to:

- treat all people (including your employees, our employees, agents and other suppliers) with respect
- treat all people (including your employees, our employees, agents and other suppliers) fairly and respect diversity in all its forms
- not engage in any form of discrimination (including based on sex, age, religion, race, national origin, sexual orientation or disability) or vilification, harassment or sexual harassment, bullying, victimisation or violence
- comply with all applicable workplace and employment laws and regulations.

Health and Safety

Safety is everyone's responsibility. We want everyone to go home safe and well each day.

We expect You to:

- provide safe and secure working conditions
- review, understand and comply with Metro's health and safety policies and procedures, and applicable health and safety laws, regulations and contract requirements
- speak up if You see any potential hazards, unsafe work conditions or practices, or if You are unsure about the safety of something or someone
- be fit for work and not influenced by drugs or alcohol
- follow all required procedures and risk management plans while at a Metro site.

Environment

We commit to responsible environmental management and strive to protect the environment.

We expect You to:

- work in an environmentally responsible manner to carefully manage environmental risks and minimise impacts
- review, understand, and comply with Metro's environment policies and procedures and all relevant permits, relevant industry standards, and applicable laws and regulations
- speak up if You observe any environment impacts, hazards or incidents or if You are unsure about any potential environmental impacts.

Human Rights

We commit to respect the human rights of all people impacted by our operations, including workers in our supply chain.

We expect You to:

- respect the human rights of all your stakeholders, including communities, your employees and those in your supply chain
- not engage in deceptive recruitment practices, or use any forced, bonded or involuntary labour
- take steps to understand and address the modern slavery risks in your operations and supply chain
- not do anything that directly or indirectly contributes to human rights violations, including modern slavery
- recognise the fundamental right of workforce to form and/or join lawful trade unions or employee groups of their choosing
- follow our policies, procedures and processes to respect human rights in our joint activities, including our Modern Slavery Policy (<https://metromining.com.au/wp-content/uploads/2024/12/P15.1-Modern-Slavery-Policy-14112024.pdf>) and notify us if You suspect a breach

- comply with any request from us as part of our due diligence enquiries to verify compliance with legislative requirements
- work with us to address any human rights issues that arise.

Communities and Indigenous Peoples

We are committed to working with local communities and Indigenous Peoples to create positive relationships and outcomes.

We expect You to:

- treat all members of the communities where we operate with dignity and respect
- when engaging with the communities where we operate, listen and respond openly, respectfully and collaboratively
- obtain all necessary compliance approvals to conduct your work
- avoid causing harm to the communities You work with and / or those communities where we operate
- respond to community concerns, complaints and grievances through a fair, timely and transparent process
- respect the rights and interests, including cultural heritage, of Indigenous Peoples and their communities
- consider opportunities to provide employment to members of the local community, including using local subcontractors.

Bribery, Corruption and Fraud

We are committed to fostering a culture of compliance and responsible business practices. We value respect and integrity and do not tolerate or engage in bribery, corruption, fraud or money laundering in any form.

We expect You to:

- comply with all applicable anti-bribery, anti-corruption, fraud and money laundering laws and regulations
- perform all business dealings honestly, transparently and fairly
- not give, accept, ask for, offer or authorise anything that might improperly influence a decision. This includes bribery of public officials, kickbacks, secret commissions, facilitation payments or improper payments regardless of whether any of these are perceived to be acceptable under local custom
- not do anything that could, or could appear to, compromise your ability or our ability to make objective and fair business decisions
- only offer or accept gifts, hospitality or anything of value that is reasonable and proportionate and not intended to gain an improper advantage or obtain or retain business
- take extra care when engaging with government officials
- not make payments to a political party, politician or candidate for office for or on behalf of Metro
- keep accurate books and records
- not source goods or services on behalf of Metro from any country, entity or persons subject to international trade sanctions
- promptly Speak Up to Metro about anything which appears to breach these principles. For example, if you are asked to pay a kickback.

Conflicts of Interest

Every day we work to build and sustain trust with our workforce, suppliers, communities and investors. We take care that our decisions in our work are not influenced by interests which could conflict with Metro's interests.

We expect You to:

- consider if Your interests conflict (or appear to conflict) with Metro's interests or your responsibilities to Metro, and where possible, avoid such situations
- where a conflict cannot be avoided, disclose to Metro any potential, perceived or actual conflict as soon as You become aware of it and provide complete and accurate details to allow us to assess it

- manage any conflicts of interest transparently and fairly and in the best interests of Metro
- not use your position or relationship with Metro to unfairly benefit yourself or those close to You.

Privacy, Data Protection and Confidentiality

Disclosing or using any personal information inappropriately can compromise the privacy and security of individuals and entities. Metro is committed to respecting privacy and the protection of data by ensuring data and information is handled appropriately and lawfully.

We expect You to:

- keep Metro's business information confidential and secure and only use it for its intended purpose
- apply adequate data protection and security measures to protect Metro data and information from unauthorised access, use and disclosure
- comply with Metro's applicable IT and Privacy procedures and local privacy and data protection laws and regulations
- immediately report potential and actual data breaches that impact Metro to the Company Secretary at cosec@metromining.com.au
- obtain written approval from Metro prior to the publication of any information or communication regarding Metro, including the use of our logo in marketing activities, press releases, social media posts or media interviews
- if You are unsure whether you are allowed to share particular information, seek advice from Metro
- retain Metro data on your systems only for as long as required.

Insider Information

We do not use confidential or insider information for personal gain for ourselves or others.

We expect You to:

- keep insider information strictly confidential
- never use or disclose insider information about Metro for personal gain or the benefit of others
- not use, or encourage anyone else to use, inside information to deal in securities (including buying or selling shares).

Speak Up

If You see something that is not right, or you think may not be right, we ask that You speak up – this can help us to prevent something from going wrong or respond if something wrong has happened.

You can report a concern about potential and actual misconduct at reveal@metromining.com.au. Our Whistle-Blower Policy, which includes contact details, can be found at <https://metromining.com.au/wp-content/uploads/2024/12/P17.1-Whistleblower-Policy.pdf>.

Potential misconduct includes fraud, theft, bribery, corruption, kickbacks, misconduct endangering health and safety or the environment, serious breaches of Metro's policies and procedures, conflicts of interest, harassment, discrimination, victimisation or bullying, human rights abuses, insider trading, and other unlawful or criminal activities.

How we work with our Suppliers

We want to work collaboratively with You in complying with our Supplier CoC.

We will treat You with respect and never ask You to act in a way that breaches the law, our Values or our Supplier CoC.

We expect our Suppliers to cooperate with Metro, or any authorised third party, to conduct audits to verify compliance with the provisions of this Supplier CoC.

Breaching our Supplier CoC can have serious consequences and we will take action that is proportionate to the breach.

This could include working with You to develop remediation or corrective action plans. In more serious or severe cases, our actions could also include suspension or termination of our business relationship.

Get in Touch

If you have a question or other feedback about this Supplier CoC, You can contact us at cosec@metromining.com.au.

If you are concerned about a breach of our Supplier CoC you can contact your Metro contract owner, Principal Representative or the Company Secretary at cosec@metromining.com.au.

Document History

VERSION	DATE	AUTHOR	APPROVED BY	NEXT REVIEW DATE
1	30.06.2025	Robin Bates	Board of Directors s	30.06.2027