

CODE OF CONDUCT



ROBEX RESOURCES INC. (ARBN: 682 762 723)

1 Introduction

The Board of Robex Resources Inc. (ARBN: 682 762 723) (**Robex**) has adopted this Code to describe the standards of behaviour expected of the directors, management and staff of Robex and its subsidiaries (**Group**).

Our Code, together with our values (disclosed on our website), is part of every decision we make and guides how we act, work, communicate and evaluate our conduct.

2 Code application

This Code applies to all directors, management and staff of the Group.

Robex may take action in relation to any failure to follow the standards in this Code, which may include removal, dismissal or termination of contract. In some cases, a breach of this Code may expose you or the Group to serious civil or criminal liability and could damage the Group's reputation.

3 Your responsibilities

You must:

- act in accordance with Robex's values and in the best interests of the Group, including its shareholders, creditors and stakeholders;
- comply with all laws and regulations that apply to the Group and its operation;
- comply with Robex's policies, procedures and systems;
- act honestly and with high standards of personal integrity;
- act ethically and responsibly;
- treat fellow staff members with respect and not engage in bullying, harassment or discrimination;
- deal with customers and suppliers fairly;
- disclose and deal appropriately with any conflicts between your personal interests and your duties as a director, senior executive or staff member;
- not take advantage of the property or information of the Group or its customers for personal gain or to cause detriment to the Group or its customers;
- not take advantage of your position or the opportunities arising therefrom for personal gain;
- report breaches of this Code in accordance with Robex's Whistleblower Policy¹; and
- attend training on your obligations under this Code.

¹ We encourage a 'speak up culture' of all issues and concerns relating to Robex. Unless you are confident your issue or concern is a solely personal work-related grievance (see section 5 of our Whistleblower Policy), we encourage you to raise it in accordance with our Whistleblower Policy. We may investigate your disclosure in accordance with our Whistleblower Policy, even where your disclosure may not qualify for protection under the Australian whistleblower laws.

4 Board reporting

The Board or its delegated committee will be informed of any material breaches of this Code.

5 Robex's objectives

Cyber security

Robex is committed to protecting its digital assets and implementing a robust cyber strategy, overseen by the Board, commensurate with the size and extent of threats to its digital assets.

Robex's objectives include taking all reasonable steps to:

- ensure Directors are educated on cyber security management;
- ensure Robex has in place appropriate risk mitigation strategies, systems, processes and controls;
- identify, classify and protect digital assets having regard to their sensitivity and criticality;
- only collect, handle and store data that is necessary to conduct its business, in compliance with all applicable laws and regulations;
- promote strong cyber security risk awareness and identify opportunities to enhance cyber resilience; and
- notify appropriate regulators of cyber security incidents, in accordance with applicable laws and regulations.

Whistleblowing

Robex is committed to providing a safe and confidential environment for people to raise misconduct concerns without fear of reprisal. Robex's objectives include:

- having a robust whistleblower program which complies with all applicable laws and regulations;
- having in place processes and procedures for receiving and handling disclosures, which, among other things, cover protection of confidentiality, fair treatment of staff and monitoring of risk of detriment to any individual;
- promoting awareness of Robex's whistleblower program;
- ensuring individuals with specific responsibilities under its whistleblower program are appropriately trained; and
- before engaging third party service providers in connection with its whistleblower program, undertaking appropriate due diligence and requiring compliance with whistleblower laws and regulations.

Money laundering and tax evasion

Robex strictly prohibits any form of money laundering and tax evasion. Robex's objective is to comply with all applicable financial regulations and taxation laws, including by maintaining a firm stance against all money laundering and tax evasion practices.

Directors, employees, contractors, consultants and any other individuals having a business relationship with Robex or its subsidiaries must not accept money or other assets if they become aware they derive from criminal activity.

Robex will only do business with third parties that have undergone due diligence and been approved. Any signs of possible money laundering and/or tax evasion should be promptly reported in accordance with the Whistleblower Policy. These signs may include (but are not limited to) cash payments, payment in a different currency to that of the invoice, reception of funds into an offshore account or a bank account in a different country to that from which business is conducted, requests for payment into or from multiple bank accounts, or requests for payment through a third party.

Corrupt Conduct

Corrupt conduct will not be tolerated by Robex or any member of the Group. Disciplinary action up to and

including dismissal will be taken in the event of any employee being found to have participated in corrupt conduct.

Corrupt conduct involves the dishonest or partial use of power or position which results in one person/group being advantaged over another. Corrupt conduct can take many forms, including but not limited to:

- official misconduct;
- bribery and blackmail;
- unauthorised use of confidential information;
- fraud; and
- theft.

Health and safety

Robex is committed to a safe workplace. Robex's objectives include:

- complying with workplace health and safety laws and regulations and conducting business in accordance with industry standards;
- promoting safe work practices;
- providing sufficient resources to establish and maintain safe systems of work;
- supporting the physical and mental well-being of staff;
- ensuring people are appropriately trained and competent to do their job (or are under direct supervision if not);
- setting and monitoring company-wide health and safety targets;
- promptly addressing safety hazards and work-related incidents and taking remedial action; and
- reporting to the Board on Robex's health and safety performance and ways to further reduce health and safety risk.

Gifts and other benefits

Robex is committed to fair business decision making processes. Accordingly, employees, contractors or consultants at Robex and its subsidiaries must not give, seek or accept in connection with their activities for or on behalf of Robex, any type of compensation, fee, commission, gift, entertainment, or other benefit or assistance which is beyond a nominal value or which is outside common commercial practice, from any past, present or future customer, supplier, competitor, joint venture partner, government, governmental or judicial body, or the staff of any such entity.

Communities

Robex is committed to building strong relationships and proactively engaging in dialogue with local communities, institutions and governments at a local, regional and national level. Robex believes that we can serve as a positive catalyst, foster long-term economic development and social benefit, and make a meaningful contribution to the UN Sustainable Development Goals (**SDGs**) by:

- respecting and promoting human rights within our area of influence, including respect for cultural heritage, customs and established rituals;
- supporting community development programmes in areas such as water, sanitation, and infrastructure, with a special focus on agribusiness and education;
- establishing dialogue and lasting relationships with communities at a very early stage, including by establishing effective grievance mechanisms; and
- seeking to avoid the resettlement of communities, and where such is unavoidable, aligning the Resettlement Action Plan (**RAP**) with International Finance Corporation (**IFC**) Performance Standards.

Environment

Robex is committed to conducting its business in an environmentally responsible and sustainable way,

including by:

- complying with environmental laws and regulations and conducting business in accordance with industry standards;
- monitoring and managing environmental impacts as appropriate to the nature and scale of its operations;
- adopting sustainable practices and collaborating with the communities in which Robex operates to continually improve them;
- integrating sustainable considerations within Robex's corporate decision-making processes;
- promptly addressing an event of environmental non-compliance and taking remedial action; and
- reporting to the Board on Robex's environmental performance and ways to further reduce environmental risk.

6 Code review

Robex will periodically review this Code to check that it is operating effectively.

The Company Secretary is authorised to make administrative and non-material amendments to this Code.

If you have any questions regarding this or another governance document, please write to spark@parkadvisory.com.au specifying the policy or charter you wish to discuss and detailing your request. Please mark communications "attention Company Secretary". We will respond to let you know who will be handling your matter and when you can expect a further response.

Version Number	Revision Date	Document Owner	Document Approver
1.1	12 th June 2025	Company Secretary	Board of Directors