
FINDER ENERGY HOLDINGS LIMITED (ACN 656 811 719)

1 Introduction

The Board of Finder Energy Holdings Limited (ACN 656 811 719) (**Finder**) has adopted this Code to describe the standards of behaviour expected of the directors, management and staff of Finder 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.

Finder 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 Finder's values and in the best interests of the Group;
- comply with all laws and regulations that apply to the Group and its operation;
- comply with Finder'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 Finder's Whistleblower Policy¹; and
- attend training on your obligations under this Code.

4 Board reporting

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

¹ We encourage a 'speak up culture' of all issues and concerns relating to Finder. 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.

5 Finder's objectives

Cyber security

Finder 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.

Finder's objectives include taking all reasonable steps to:

- ensure Directors are educated on cyber security management;
- ensure Finder 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

Finder is committed to providing a safe and confidential environment for people to raise misconduct concerns without fear of reprisal. Finder'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 Finder'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.

Health and safety

Finder is committed to a safe workplace. Finder'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 Finder's health and safety performance and ways to further reduce health and safety risk.

Environment

Finder is committed to conducting its business in an environmentally responsible and sustainable way 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 Finder operates to continually improve them;
- integrating sustainable considerations within Finder's corporate decision-making processes;
- promptly addressing an event of environmental non-compliance and taking remedial action; and
- reporting to the Board on Finder's environmental performance and ways to further reduce environmental risk.

6 Code review

Finder 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.

Version Number	Revision Date	Document Owner	Document Approver
v.2	1 August 2024	Company Secretary	Board of Directors
