



**OCEANAGOLD**

# **OUR CODE** of Conduct



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# LIVING OUR CODE

**Our Code of Conduct is core to who we are and how we work.**

People across OceanaGold have worked collaboratively to bring Our Code together so that it reflects our target culture and the behaviours we expect.

It applies to everyone at OceanaGold: directors, employees, contractors and anyone acting on our behalf . We all need to understand it and put it into action in our daily work.

Raising concerns when something does not look right is also part of adhering to Our Code. This includes calling things out in the moment and standing up for our Values.





Breaching Our Code can have serious consequences – it could compromise safety, damage the trust we build with communities and each other, and impact our performance. Violations of our Code, our policies or the law could result in disciplinary action including termination.

If you have any suggestions for how we can bring our Code to life, we welcome your thoughts because we all own Our Code. Please get in touch at [business.integrity@oceanagold.com](mailto:business.integrity@oceanagold.com)

In this section you will find information on:

- What We Value and our Success Ingredients
- Our Expectations of Each Other
- Making Decisions
- Raising Concerns

# What we value and our 'success ingredients'

## OUR VALUES



### CARE

We care for the safety, health and well-being of our people, the environment and local communities.



### RESPECT

We respect and listen to each other, embracing different views and diversity in all its forms.



### INTEGRITY

We do the right thing and take accountability to deliver on our commitments.



### PERFORMANCE

We strive for excellence through learning, continuous improvement and innovating.



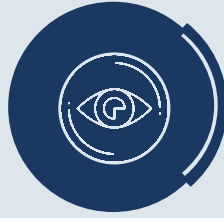
### TEAMWORK

We achieve great outcomes by everyone contributing and working together.



## OUR CODE OF CONDUCT

supports us to live our Values and achieve our Purpose of mining gold for a better future.



## OUR VISION

is to be a company that people trust, want to work and partner with, supply and invest in to create value.



## OUR PURPOSE AND VALUES

work hand in hand to guide the actions we take individually and as a Company to bring this Vision to life.

## WE WILL SUCCEED WHEN WE:

- are **open and trusting**, communicating and sharing knowledge
- are **inspired and aligned** by shared goals
- **think like business owners** to safely and responsibly maximise production, reduce cost and increase returns
- **raise concerns, contribute and take action**
- are **operationally disciplined** and do the basic things well
- **motivate, coach and celebrate** people's contributions and achievement





# Our expectations of each other

## EVERY DAY WE...

Put our **Values, Success Ingredients and Our Code** at the core of everything we do.

**Treat each other** fairly, with care and respect.

Look out for **our safety** and the **safety** of those we work with.

**Act with integrity** and make **work decisions** that are in the best interests of OceanaGold.

Follow **policies, standards and procedures**.

**Raise concerns** if we are unsure or something does not seem right.

**Ask for help** if we need more information to do our job better.





Every time we have contact with another person in the workplace we are contributing to the culture of our workplace.



## WHEN WE'RE LEADING PEOPLE WE ALSO...

### SHARE

Help our team and others to understand Our Code, policies, standards, procedures and expected behaviours.

### NURTURE

Foster an environment where everyone feels included and safe to raise concerns without fear of being treated unfairly.

### ACT

Handle any concerns seriously by listening, responding respectfully and promptly, and escalating appropriately.

### ENHANCE

Look for opportunities to improve our own capability and that of our teams.



# Making decisions



## DO I HAVE ENOUGH INFORMATION?

- Do I have the knowledge, training and tools I need?
- Do I need to ask for guidance or check our standards or procedures?
- Am I making assumptions?



## SHOULD I DO THIS? / WHY AM I DOING THIS?

- Am I living our Values and our Success Ingredients?
- Do I feel pressured, tired, or rushed?
- Do I need to raise a concern or ask for help?

We must always act with integrity and make decisions that are in the best interests of OceanaGold. This could include decisions that we make in our personal life that could impact other people who work with us or OceanaGold's reputation.

To help us make good decisions, we should use our Values and Success Ingredients to guide us.

Our Code guides us in our work, but it cannot cover every situation. When faced with a decision you are unsure about, ask yourself these questions.



## WHAT COULD HAPPEN IF I MAKE THIS DECISION?

- Could there be unintended consequences e.g. for individuals, communities, the environment or safety?
- Could this decision conflict with OceanaGold's interests or impact our reputation?



## HOW COULD THIS LOOK TO OTHERS?

- Could it look wrong or unethical?
- Would I feel ok if others knew about the decision and actions?
- Do I need to explain OceanaGold's expectations and standards to those involved?



Take the time to consider these questions, and if you are unsure, stop and think before you act. You can always ask for help if you need it.

# Raising Concerns



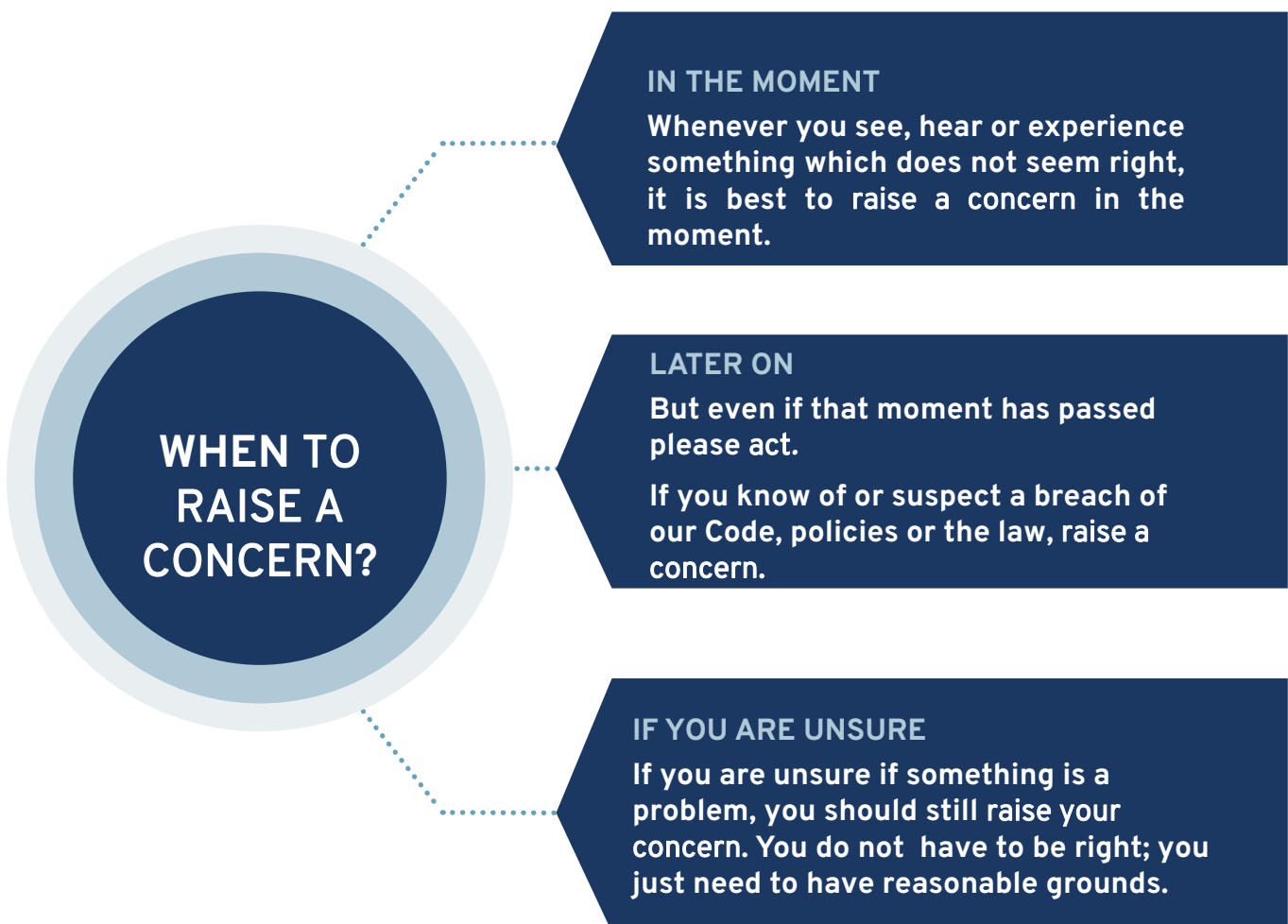
## WHY IS IT IMPORTANT TO RAISE CONCERNS?

Preventing an incident can save a life, protect our communities and safeguard OceanaGold's Values and reputation.

Responding to an incident appropriately can help us to learn from it, put things right and improve.

At OceanaGold we ask people to raise their concerns – it is one of our key 'Success Ingredients'.

We all have a responsibility to promote a safe, ethical and respectful work environment. If you notice a situation that goes against these principles, it is important to call it out.



# Raising Concerns



We recognise raising a concern about potential misconduct isn't always easy. We protect people who do – if at any time you believe you are being treated unfairly because you raised a concern, you should reach out to the Business Integrity team for support.



Every concern is different and will be handled slightly differently, depending on what it is and how you raise your concern.

## REMEMBER

### REFLECT

If someone speaks to you about your words or actions, take the time to understand their point of view, reflect on it and learn from it.

### CARE

If someone reports a concern to you, please care. Make sure they feel heard and where appropriate escalate the concern through the appropriate channels.

### FOSTER

If you are a people leader, take the time to learn how to handle concerns and foster a culture of raising concerns.

## Need help?

Ask the Business Integrity team or go to:



# WORKING TOGETHER

**Wherever we are and whatever we are doing, we care for each other.**

At OceanaGold, our people carry out hundreds of different roles each day. Each role is critical to help us achieve our shared goals.

Wherever we are and whatever we are doing, when working together we care for the safety, health and well-being of ourselves and each other.

We treat each other with respect and fairness and maintain a clear focus to achieve our goals.





In this section you will find information on:

- Belonging
- Fairness & Respect
- Safety
- Health & Wellbeing



# BELONGING

At OceanaGold, we want everyone to feel they belong and are accepted, included and respected.

## WHY DOES IT MATTER?

For us to be successful together, we need a workplace that is diverse, inclusive and fair.

We come from different backgrounds. When we feel accepted, included and respected for who we are, we can speak openly, listen and understand. Diversity is a strength; it helps us create new ideas and find better ways of doing things. A diverse organisation will allow people to open up more and give them confidence to contribute to the organisation.



WORKING  
TOGETHER

## HOW WE SHOULD BEHAVE

- Treat everyone fairly, consistently and respectfully.
- Consider how our words and actions are received by others.
- Recognise and celebrate people for their contributions and achievements.
- Actively listen to learn from other's views and experiences.
- Provide people with opportunities to speak openly and share ideas.
- Embrace individual differences.
- Raise a concern if we see someone being treated unfairly.
- Role model inclusive behaviours and talk about why diversity, fairness and inclusion matters.





## WHAT TO WATCH OUT FOR

- Making quick judgements about people based on how they look, think and act.
- Only accepting or including people who look or think like us.
- Not acknowledging someone's hard work/efforts or achievement of goals.
- Interrupting, talking over or ignoring others.

## BE CURIOUS. ASK YOURSELF...

CONVEY

Can I do more to show my colleagues I care about them and value working with them?

EXPRESS

Am I communicating openly?

CARE

Am I using respectful and inclusive language?

LISTEN

When someone is sharing their ideas with me, am I really listening to understand them?



### Need help?

Ask the People & Culture Team or go to:





# FAIRNESS & RESPECT

We care for and respect each other, raise a concern if something isn't right and support others when they do.

## WHY DOES IT MATTER?

We all want to feel safe, included and respected at work. We can all do our part to create a workplace where everyone feels this way.

Sexual harassment, bullying and unfair treatment have no place at OceanaGold.

How we behave is a choice. The way we talk, joke, socialise and act, all contribute to workplace culture. So does what we accept of others.



WORKING  
TOGETHER

## HOW WE SHOULD BEHAVE

- Consider others' thoughts, feelings and perspectives.
- Understand what discrimination and vilification, harassment and sexual harassment, and bullying and victimisation and violence can look, feel and sound like – and know that we don't do it.
- If we feel safe and comfortable, act when we experience, see or hear about inappropriate behaviour or materials.
- Care for and support people impacted by inappropriate behaviour.
- If someone speaks to us about our words or actions, take the time to reflect on, understand, and learn from their point of view.
- Role model appropriate behaviours and professional relationships.







## WHAT TO WATCH OUT FOR

- Tolerating bad behaviour because of the person's status such as role seniority, community influence, longevity or because they are said to be a "high performer".
- Failing to check if someone is ok if you see them upset or struggling.
- Treating someone less fairly because they didn't respond well to your joke or didn't agree with your opinion.
- Deliberately not giving people all the information they need to safely and effectively meet the expectations of their job.
- Being dismissive or using patronising language.
- Not paying attention to how people are responding to your words or actions.

## BE CURIOUS. ASK YOURSELF...

### REFRAIN

Do I understand what acceptable boundaries are at work? / Am I being overly familiar with colleagues in my words and actions?

### DISCERN

Am I making an unfair judgment about someone? Have I checked all the facts?

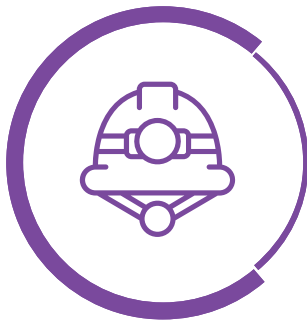
### RESPECT

Am I consistent in how I treat everyone, regardless of their background?

## Need help?

Ask the People &  
Culture Team or go to:





# SAFETY

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

## WHY DOES IT MATTER?

Every person has the right to work in a safe environment. We all have a responsibility to contribute to and participate in our safety culture. This means we look out for our own and one another's safety.

We value the safety of our workforce and want them to reach their full potential. So, we strive to provide safe working conditions. And we continue to look for ways to reduce potential physical and psychological harm.



WORKING  
TOGETHER

## HOW WE SHOULD BEHAVE

- Actively contribute to improving safety at work.
- Make sure we are fit for work every day, that we are physically and emotionally able, and not influenced by drugs or alcohol.
- Take the time to assess the safety of the task we are doing or starting.
- Raise a concern if we are unsure about the safety of something or someone.
- Support people who are injured or ill.
- Comply with local safety laws and regulations.
- Do not walk by something that we think could cause harm to people.
- Report potential hazards, unsafe work conditions and practices.



## WHAT TO WATCH OUT FOR

- Becoming complacent – ‘I’ve done this 1,000 times’ or ‘I’ve been here for 15 years’.
- Not listening or engaging in training.
- Making decisions about people’s safety without them –not asking people actually doing the work about their work and ways to improve it.
- Accepting the status quo and thinking an issue is someone else’s problem, or that someone else will report the potential hazard or unsafe work practice.
- Only relying on other people, systems, controls and equipment to manage our personal safety.



## BE CURIOUS. ASK YOURSELF...

THINK

Is this the safest way to do this task?

QUESTION

What can go wrong?

ACT

Should I step in or say something?

### Need help?

Ask the Health and Safety Team or go to:





# HEALTH & WELLBEING

We all have a responsibility to consider our own and each other's health and wellbeing. We want everyone to go home healthy and well each day.

## WHY DOES IT MATTER?

Working conditions and the demands of work can be a source of stress and affect health and wellbeing. Providing our workforce with an environment that supports them mentally and physically is vital for individuals, their families and the community.

Our activities can potentially expose people to substances, situations, and behaviours, immediately and over time, that can cause harm, so we monitor our workplaces and local communities to manage and reduce our impact on people's health and wellbeing.



WORKING  
TOGETHER

## HOW WE SHOULD BEHAVE

- Consider the health and wellbeing of our workforce and others in how we work.
- Take the time to connect with our team members.
- Provide services that support the health and wellbeing of our workforce.
- Provide information, education and training, as well as monitoring on potential workplace and community exposures.
- Understand the role workplace safety plays in people's health and wellbeing.
- Participate in strategies and programs to identify, understand and reduce exposure to occupational health hazards.
- Support those with long term physical and psychological conditions to assist in their safe return to work.



## WHAT TO WATCH OUT FOR

- Ignoring or not understanding the potential exposures in our workplace.
- Seeing someone struggling and not doing anything to assist or support them.
- Being unaware of discriminating and excluding behaviours and attitudes.
- Placing unnecessary pressure on ourselves or our teams.
- Excluding someone because they don't look, think or act like you.

## BE CURIOUS. ASK YOURSELF...

### ASSIST

As a leader, am I supporting my team?

### LISTEN

Am I really listening?  
Do I understand?

### CHECK

Do I have the right tools to do my job including training and equipment?



## Need help?

Ask the Health and Safety Team or go to:



# WORKING WITH OTHERS

Our Values and Our Code apply to how we work with people outside OceanaGold, just as much as they apply to how we work together.

At OceanaGold we work with many different people and organisations who are not part of the Company.

They might be suppliers, members of the community or they might work with a regulator or other government agencies. Whoever they are, we are to treat them with the same respect and integrity that we treat each other.





In this section you will find information on:

- Communities
- Environment
- Human Rights
- Indigenous Peoples
- Our Suppliers
- Government & Civil Society
- Communicating Externally



# COMMUNITIES

We strive to create a positive legacy in the communities where we operate by building relationships and partnerships that deliver sustainable outcomes.

## WHY DOES IT MATTER?

What we do has the potential to change communities. We can be a positive force, improving livelihoods and creating and sharing opportunities.

We want to be a good neighbour and are committed to acting responsibly and respecting local cultures.

## HOW WE SHOULD BEHAVE

- Listen and respond transparently, respectfully and collaboratively.
- Make an effort to get to know local communities and try to understand their interests and expectations as well as the impacts of what we do.
- Respect different cultures including their relationship with the land, water and natural resources.
- Provide communities with a transparent and accessible process for concerns, complaints and grievances.
- Respect the information given to us by communities.
- Provide appropriate training to people who are engaging with communities.



## WORKING WITH OTHERS





## WHAT TO WATCH OUT FOR

- Not hearing or respecting community views.
- Making assumptions or decisions on behalf of communities without testing it with them.
- Not understanding our biases or considering the cultural norms of communities.
- Not considering the potential secondary impacts of our activities – those that may occur later or at a different place including changes to people's lives, local resources and infrastructure.
- Our engagement is not planned or resourced correctly and does not deliver value to the community.
- Not following our standards and requirements before we offer or approve sponsorships or donations.
- Not having the right processes to appropriately monitor and respond to community issues or concerns.

## BE CURIOUS. ASK YOURSELF...

### INFORM

Do I know enough about local communities? E.g. how the local community makes decisions and what the community wants for the future.

### REFLECT

Do I know the positive and negative impacts on others before I start my work?

### LEARN

Do I have the right training to engage with communities?

### CHECK

Am I authorised to represent OceanaGold at community events or in public forums?

**Need help?** Ask the External Affairs and Social Performance or Community Relations team or go to:





# ENVIRONMENT

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

## WHY DOES IT MATTER?

The environment supports life. We all depend on natural resources like clean water, air and productive land. We all have a responsibility to prevent and minimise harm to the environment.

We understand the environmental impacts and challenges of our activities. At every stage of our operations, we seek to avoid, minimise, rehabilitate and offset our impact by conserving natural resources, reducing waste and emissions, preventing environmental harm and caring for ecosystems.

We work with our communities and stakeholders to create opportunities to enhance environmental and beneficial outcomes to water quality, livelihoods and biodiversity.

## HOW WE SHOULD BEHAVE

- Never ignore something which we think could cause environmental harm.
- Comply with permits, applicable legislative requirements and external commitments.
- Report environmental hazards and incidents.
- Strive to manage our environmental risks and minimise environmental impacts.
- Engage with our stakeholders to help us understand our effects and their expectations.
- Consider our greenhouse gas emission profile in planning our operations e.g. buying new equipment.



WORKING  
WITH OTHERS



## WHAT TO WATCH OUT FOR

- Clearing land without the proper environmental authority.
- Not managing or monitoring our tailing storage facilities.
- Not considering mine closure at the start of, and during, operations.
- Not having adequate controls to prevent pollution or water depletion.
- Incorrectly storing or handling hazardous substances, causing environmental and personal safety harm.
- Not completing required training or seeking to understand our potential environmental impacts.

## BE CURIOUS. ASK YOURSELF...

### INFORM

Do we have the right approvals to undertake this activity?

### REFLECT

Could my actions cause harm to the environment? And if so, what have I done to mitigate them?

### LEARN

Is there an environmental control in place? Do I need to move, change or modify the control mechanism?

### CHECK

Do I know how to respond to an environmental incident?

## Need help?

Ask the Environment team or go to:





# HUMAN RIGHTS

We commit to respect human rights in all our interactions.

## WHY DOES IT MATTER?

Everyone has human rights – they include the right to family life, political participation and choice of religion, among others.

Our activities, and those of our suppliers, impact people wherever we operate. The positive impacts can include providing a safe workplace, paying employees a fair wage and improving access to education and health care in host communities. We also recognise that poor decisions can have negative impacts and we seek to prevent these or fix them if they occur.

We are committed to respecting the human rights of all people directly and indirectly impacted by our operations. We all have a role in upholding human rights and identifying potential human rights risks.



WORKING  
WITH OTHERS

## HOW WE SHOULD BEHAVE

- Treat people with respect and decency.
- Take time to understand what human rights means.
- Say something when we see behaviours or situations that threaten human rights.
- Listen and learn from our stakeholders to understand how our decisions impact them.
- Follow our processes to respect human rights in our activities.
- Complete any human rights training and understand how it applies to our work.
- If we find an issue, consider the needs of those impacted first, working to resolve issues fairly and transparently.
- Expect our suppliers to respect and uphold human rights, including not engaging in or contributing to modern slavery.
- Follow our grievance processes.





## WHAT TO WATCH OUT FOR

- Thinking human rights are only an issue in “other countries”.
- Making decisions too quickly or without understanding the impacts on others.
- Ignoring or not raising concerns about potential issues because they are “not my problem”.
- Only considering the financial (and not the human cost) when making supplier decisions.
- Not taking a complaint seriously because we have not tried to understand the issue.

## BE CURIOUS. ASK YOURSELF...

### REFLECT

How does my decision impact others?

### RELATE

Is this how I would want to be treated?

### CONSIDER

Even if I believe I am doing the right thing, could others see it differently?



## Need help?

Ask the External Affairs and Social Performance team or go to :





# INDIGENOUS PEOPLES

We recognise our role in respecting and safeguarding the distinct unique rights, interests and connections to land and waters of Indigenous Peoples.

## WHY DOES IT MATTER?

As our operations may impact Indigenous Peoples' interests, we have a responsibility to seek to understand and respect their perspectives and collaborate.

Indigenous Peoples or Communities are distinct social and cultural groups who share collective ancestral ties to lands and natural resources. Their identities, cultures, livelihoods, as well as their physical and spiritual well-being, can be inextricably linked to those lands and natural resources. We recognise Indigenous Peoples' rights extend beyond the physical connection to land and include traditions, heritage and relationships.

## HOW WE SHOULD BEHAVE

- Take steps to understand who local Indigenous Peoples are, recognising that there may be more than one group.
- Confirm how they would like to be referred to and engaged with.
- Educate ourselves about Indigenous Peoples' connections to land, water and natural resources, cultural traditions and traditional decision-making structures.
- Communicate early with Indigenous Communities, aiming to create meaningful and respectful dialogue.
- Be transparent in our consultation with Indigenous Communities and strive to listen to everyone impacted.



WORKING  
WITH OTHERS



We have chosen to use the term “Indigenous Peoples” because it is the globally accepted term when talking about Indigenous groups as a collective. We acknowledge that this language does not capture the unique identity of specific communities.

We recognise Indigenous Peoples’ right to self-determination – to freely determine their political status and freely pursue their economic, social and cultural development – including their right to express how they should be referred to.



## WHAT TO WATCH OUT FOR

- Acting in a way we think is respectful or helpful without understanding Indigenous Peoples’ perspectives.
- Causing harm or degradation by not listening to or including Indigenous Communities in our activities.
- Not providing people with adequate training to interact with Indigenous Communities.
- Leaving it too late and rushing or pressuring Indigenous Communities.
- Only talking to Indigenous Peoples when we need something from them.

## BE CURIOUS. ASK YOURSELF...

### CONSIDER

Do I know enough about local Indigenous Communities? Do I know how they make decisions and what they want for the future?

### REFLECT

Do I know the impacts on others before I start my work? Can my actions negatively impact others?

### LEARN

Do I have the right training to engage with Indigenous Peoples and Communities?



## Need help?

Ask the External Affairs and Social Performance team or go to:





# OUR SUPPLIERS

We work collaboratively with our suppliers to do business with integrity and accountability.

## WHY DOES IT MATTER?

Suppliers are a key relationship for OceanaGold and we have the potential to influence suppliers' behaviour. Working with suppliers who share and respect our values reduces the risk of harm to people and the environment.

Having clear expectations and working with our suppliers to do the right thing can reduce risks to us and our communities and achieve better outcomes.



## WORKING WITH OTHERS

## HOW WE SHOULD BEHAVE

- Take steps to understand who our suppliers are and whether the standards to which they operate align with ours.
- Think about what our suppliers do for us, where they do it and how – keeping in mind how this could create risks.
- Do not use our position to inappropriately benefit ourselves or those close to us.
- Help our suppliers to understand our expectations, including our Supplier Code of Conduct.
- Make sure our selection of suppliers, and compensation arrangements, are fair, transparent and documented.
- If selecting or managing suppliers is part of our job, make sure we know our Supplier Code of Conduct.
- When selecting suppliers, comply with any applicable laws, including relating to trade sanctions.
- Strive to share knowledge and improve together.



## WHAT TO WATCH OUT FOR

- Not explaining our expectations to suppliers, causing them to do something wrong on our behalf.
- Getting too close to a supplier and increasing the chance of a conflict of interest, collusion, corruption, or fraud.
- Not considering potential modern slavery risks in our supply chain, which may contribute to human suffering.
- Acting too quickly and appointing an unqualified supplier whose standards may violate Our Code.
- Not monitoring supplier invoicing, payments, and the use of our assets, making us more vulnerable to risks, including fraud.

## BE CURIOUS. ASK YOURSELF...

### REVIEW

Do I know enough about this supplier's background?

### CONSIDER

Have I taken the time to explain our expectations?

### LEARN

Do I know what this supplier is doing for us and how they are doing it?



## Need help?

Ask the Business Integrity  
or Group Procurement teams  
or go to:





# GOVERNMENT & CIVIL SOCIETY

## WHY DOES IT MATTER?

We regularly engage with governments and civil society in our work. Policy and regulation impact our business, the industry and the communities in which we operate. It is important that our interactions with governments are transparent, and to a high ethical standard to maintain trust in OceanaGold.

We believe that civil society organisations play a key role in supporting and advocating for responsible business conduct and improving the wellbeing of people and the environment.



## WORKING WITH OTHERS

## HOW WE SHOULD BEHAVE

- Respect political processes – we do not favour any political party, group or individual.
- Through authorised spokespeople, engage in policy discussion with government and civil society and share how particular policies and legislation may impact our business.
- Never do anything that could, or could appear to, improperly influence anyone's decision-making.
- Act transparently in all dealings with government, maintaining accurate and timely records.
- Engage with others in civil society, including NGOs and academia, where appropriate.





We are committed to genuine dialogue and respectful engagement with governments and civil society. We respect political processes and engage with governments and regulators, transparently and ethically.



### WHAT TO WATCH OUT FOR

- Not being transparent about our reasons for advocating for change, allowing room for speculation.
- Not considering how our actions could be perceived by others.
- Participating in political processes inadvertently and unknowingly.
- Not considering civil society in our dealings with government.

### BE CURIOUS. ASK YOURSELF...

#### ASSESS

Am I improperly influencing others by what is being offered?

#### REFLECT

How does this look? Could this be seen as an attempt to influence someone improperly?

#### CHECK

Am I authorised to engage with government or regulators?



### Need help?

Ask the Legal team  
or go to:





# COMMUNICATING EXTERNALLY

We communicate respectfully and transparently about our activities, operations and performance.

## WHY DOES IT MATTER?

We share information that is accurate, transparent and accessible because we value and respect the relationships we have with our communities, employees, financial markets, suppliers and stakeholders.

The information we share can be used to make decisions about investment, contracts, employment and must be communicated through the right channels and by authorised representatives.



## WORKING WITH OTHERS

## HOW WE SHOULD BEHAVE

- Obtain required permissions before commenting or sharing information (including photos and videos) about OceanaGold or employees on social media.
- Refer media or investment enquires to Corporate Communications and Investor Relations.
- Share information or meet our public disclosure obligations through approved channels.
- Seek advice if you are unsure if the information you would like to share is permitted.
- Raise a concern if we see or hear confidential or incorrect information being shared by unauthorised representatives.





## WHAT TO WATCH OUT FOR

- Accidentally sharing confidential information.
- Talking about confidential information in a public place or leaving confidential printed information behind where it could be discovered.
- Disclosing confidential or non-public information on social media or with other media.
- Sharing information that has not been verified or reviewed and approved by an authorised representative.

## BE CURIOUS. ASK YOURSELF...

CONSIDER

Should I be saying this?

VERIFY

Is this accurate?

CHECK

Am I authorised to share this?



### Need help?

Ask the Corporate Communications team or Legal team or go to:



# WORKING WITH INTEGRITY

**Working with integrity means doing the right thing, even when no one is watching. It also means doing what we say we are going to do.**

We would rather miss out on an opportunity than compromise our integrity. By working with integrity, we build trust.

Our Code guides us on doing the right thing. Of course we must comply with the laws of our host countries and relevant international laws – often our standards at OceanaGold are higher than the law.

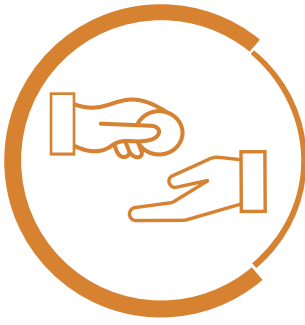
We also recognise that handling unethical requests can create significant pressure on individuals, especially in business-critical processes, and we actively support our colleagues in managing these situations.

Working with integrity means we follow our policies and standards. We seek approval when required. We ask if we are unsure what to do.



In this section you will find information on:

- Corruption and Dishonesty
- Giving and Receiving
- Conflicts of Interest
- Fair Competition
- Privacy and Personal Information
- Our Assets
- Insider Information



# CORRUPTION & DISHONESTY

## WHY DOES IT MATTER?

Bribery, corruption and fraud can cause significant harm to OceanaGold and the communities in which we operate. They increase poverty and inequality, hinder development, undermine judicial and political systems and reduce healthy competition. Integrity and accountability are core to our Purpose and Values. We strive to set an example within our communities.

Bribery happens when someone gives, offers or asks for something of value to gain an advantage they are not entitled to. Fraud involves acting dishonestly to gain an advantage or to cause someone loss. Corruption is the abuse of position for personal gain.



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## HOW WE SHOULD BEHAVE

- Have zero tolerance for bribery and corruption – including bribery of public officials, kickbacks and secret commissions.
- Take care not to do anything that could, or could appear to, compromise our decision-making.
- Award work fairly, transparently and based on legitimate processes.
- Promptly report anything which we think could be a bribe, corruption or fraud, including attempted bribery and fraud.
- Keep records and obtain receipts for all legitimate payments we make.

We want to contribute and succeed fairly and honestly. We do not give, accept, ask for, offer or authorise anything that might improperly influence a decision.



## WHAT TO WATCH OUT FOR

- Bribes do not need to be money; they include anything of value. In some cases, they can be favours, gifts, entertainment, travel or donations.
- 'Local custom' is not a reason to pay a bribe – every bribe hurts someone.
- Small bribes are still bribes – even facilitation payments (such as a payment to a government official to unofficially speed up a process).
- Asking or suggesting someone else does it – if a supplier pays a bribe from which we benefit this is also wrong.
- Falsely claiming expenses, time worked, or work done.

## BE CURIOUS. ASK YOURSELF

### REFLECT

How does this look?  
Could this be seen as an attempt to influence someone improperly?

### ASSESS

Do I know what our suppliers do on our behalf?

### CLARIFY

Do I know what I am being asked to pay for or why?  
If in doubt, get advice from Business Integrity or Group Legal before you act.



## Need help?

Ask the Business Integrity or Group Legal team or go to:







# GIVING & RECEIVING

We contribute and build relationships through mutual respect and transparency. Giving and receiving must never improperly influence ours or others' decisions.

## WHY DOES IT MATTER?

Sponsorships and donations can support and strengthen our local communities. Other giving and receiving such as gifts, entertainment or hospitality may also have a legitimate business benefit.

We act with integrity so we must never allow giving or receiving gifts, entertainment and hospitality, or sponsorships and donations, to improperly influence decisions or behaviour.

## HOW WE SHOULD BEHAVE

- Only give or receive gifts, entertainment or hospitality that are reasonable in the circumstances and not intended to influence business decisions or behaviour.
- Ensure any sponsorships or donations meet our requirements.
- Do not give or accept anything which could put our integrity in doubt.
- Obtain required approvals and keep accurate records of all gifts, entertainment, hospitality, sponsorship and donations.
- Openly and transparently participate in any monitoring or review processes.



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## WHAT TO WATCH OUT FOR

- Not communicating clearly what we can give or accept, allowing others to take advantage.
- Not thinking about how it might look.
- Not being clear about why we are providing a sponsorship or donation.
- Not knowing who ultimately benefits from the sponsorship or donation.

## BE CURIOUS. ASK YOURSELF

### CONSIDER

Does it coincide with negotiations or a decision?

### ASSESS

Who is involved, and what is proposed? Is the person receiving in a position of influence, access or decision-making power?

### CERTIFY

Does the sponsorship or donation meet our requirements and support sustainable development? Has this been documented?



## Need help?

Ask the Business Integrity team or go to:





# CONFLICTS OF INTEREST

We take care that our decisions in our work are not influenced by interests which could conflict with OceanaGold's.

## WHY DOES IT MATTER?

Every day, we work to build trust with our workforce, suppliers, communities and investors. This trust can be damaged if it looks like our judgment is affected by personal interests. Disclosing and managing conflicts of interest protects us individually and OceanaGold.

Not all conflicts of interest are a problem, but we need to be transparent about them to assess and manage them.

## HOW WE SHOULD BEHAVE

- Do not use our position to benefit ourselves or those close to us unfairly.
- Consider if our interests conflict (or appear to conflict) with OceanaGold's interests.
- Ask for advice if we are unsure.
- Disclose any potential or actual conflict as soon as we become aware of it.
- Manage any conflicts of interest transparently and fairly and in the best interests of OceanaGold.
- Where we cannot avoid a conflict of interest, disclose it so it can be managed.



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## WHAT TO WATCH OUT FOR

- Accepting overly generous benefits can make us feel obligated to the giver.
- Personal relationships or relationships with suppliers or competitors that can leave us torn between the interests of OceanaGold and the interests of the supplier or competitor.
- Hiring, promoting or supervising a family member or someone with whom you live or have a close relationship.
- Not disclosing investments or directorships in a supplier or competitor.

## BE CURIOUS. ASK YOURSELF

### REFLECT

Does this conflict with my responsibilities to OceanaGold?

### ASSESS

Could this affect my ability to make fair and objective decisions?

### CONSIDER

Even if I'm confident I can be objective, could others see it differently?



## Need help?

Ask the Business Integrity  
or Group Legal team or go to:





# FAIR DEALING

We compete fairly and succeed on merit.

## WHY DOES IT MATTER?

Free and fair competition benefits us and society. It gives us greater choice and can lead to innovation.

Unfair competition can take many forms. It broadly includes any actions we take to make it difficult for other companies to compete commercially. It distorts markets, harms people and destroys trust. Sharing confidential information about OceanaGold can also be unfair competition. Breaching competition laws could also have serious consequences for individuals and OceanaGold, including fines and imprisonment.

## HOW WE SHOULD BEHAVE

- Deal fairly, never misusing information, power, or influence.
- Do not manipulate, conceal or misrepresent.
- Consider fair competition risks when dealing with (potential) competitors, regulators, and suppliers.
- Consider whether the information we are using is confidential. We check if the information is available publicly before sharing it outside OceanaGold.
- Only gather information ethically on competitors and other stakeholders.



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## WHAT TO WATCH OUT FOR

- Sharing information without thinking about confidentiality.
- Getting too close to business partners and forgetting about knowledge-sharing boundaries.
- Thinking what we're sharing is common knowledge when it's confidential information.
- Not setting clear boundaries about what information can and can't be shared.
- Not disclosing it when someone tells us something they shouldn't have.

## BE CURIOUS. ASK YOURSELF

### CONSIDER

How could this look to others?

### REFLECT

Am I over-sharing?

### CHECK

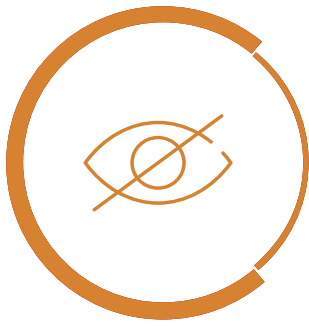
Is this information available outside of OceanaGold?



## Need help?

Ask the Legal team  
or go to:





# PRIVACY & PERSONAL INFORMATION

We collect, use, store and dispose of personal information responsibly and legally.

## WHY DOES IT MATTER?

The information we use in our work can include personal information about individuals and sensitive personal information (such as medical records). People trust us to keep this information safe and secure.

Disclosing or using any personal information inappropriately can compromise the privacy and security of individuals. A cyber security breach can also compromise the confidentiality of the personal information we hold.

Unauthorised disclosure of personal information could cause OceanaGold to breach our legal obligations.



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## HOW WE SHOULD BEHAVE

- Collect the minimum amount of personal information that we need for business purposes.
- Use personal information for legitimate purposes only and limit access to those who need it for their work.
- Store physical and electronic copies securely.
- Do not keep personal information for longer than needed and we destroy it securely.
- Do cybersecurity training and look out for and report suspicious emails.
- Follow our procedures and local privacy and data protection laws.
- Report potential data breaches to the Privacy Officer immediately.







## WHAT TO WATCH OUT FOR

- Asking for more personal information than we need “just in case”.
- Collecting sensitive information without the necessary consent.
- Leaving documents containing personal information lying around.
- Discussing someone’s personal information (e.g. medical record or their address) in a shared space or public place where others can overhear.
- Sharing our OceanaGold login details with someone else.
- Leaving our computer unlocked when we walk away from it.

## BE CURIOUS. ASK YOURSELF

### QUESTION

Do we need to collect this personal information?

### SCREEN

Does this person need to know the information I’m about to share with them?

### RELATE

Would I feel comfortable hearing my personal information shared in this way?



## Need help?

Ask the Legal team or go to:  
For a cybersecurity question ask  
the Digital Technology team.





# OUR ASSETS

We protect and respect OceanaGold's assets and use them only for proper business purposes.

## WHY DOES IT MATTER?

Our assets include physical items – such as mining fleets, IT equipment, facilities. Our assets also include non-physical items such as information about OceanaGold which is confidential and not public such as commercial and financial information, intellectual property, information about third parties and exploration results.

Protecting and using our assets only for their intended purpose helps us perform better and maintain the trust of our colleagues and stakeholders.

## HOW WE SHOULD BEHAVE

- Use OceanaGold assets responsibly in our work and only for their intended purpose.
- Keep complete and accurate records relating to all OceanaGold assets.
- Keep OceanaGold's business information confidential and secure.
- Take care only to disclose information to a third party where permitted and with appropriate protections.
- Follow OceanaGold's policies and procedures when creating, managing or destroying records (e.g. emails, internal memos, other reports).



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## WHAT TO WATCH OUT FOR

- Falsely claiming expenses, time worked, or work done.
- Taking or misusing assets including money, equipment, supplies or other property.
- Not checking if information is confidential before sharing it.
- Discussing confidential information in public places where others can hear.
- Sharing our passwords or security access with another person.
- Accessing, downloading or sharing unauthorised software or inappropriate content.

## BE CURIOUS. ASK YOURSELF

RELATE

Is this how I would want my personal property to be used?

REFLECT

Even if I believe I am doing the right thing, could others see it differently?

CHECK

Is this information available outside of OceanaGold?

CONSIDER

Am I over-sharing?



### Need help?

Ask the Legal team  
or go to:





# INSIDER INFORMATION

We handle insider information responsibly and do not engage in insider trading. We do not use confidential or insider information for personal gain for ourselves or others.

## WHY DOES IT MATTER?

In our jobs, we may have access to insider information – that is confidential information which would reasonably be expected to have a significant effect on our share price, the value of our business, or the value or share price of our business partners.

It's fine to know inside information but it is illegal to share, personally use or encourage someone else to use it to buy, sell or otherwise deal in securities. This is called insider trading or tipping.

To maintain our integrity and trust in us, we must protect and respect Company information and information gathered about our business partners.

## HOW WE SHOULD BEHAVE

- Take care to keep any insider information strictly confidential.
- Never use or disclose insider information about OceanaGold or business partners for personal gain or to assist another.
- Do not trade in securities of OceanaGold or business partners when we possess insider information.
- Follow the blackout periods when it is not possible to trade in OceanaGold securities.
- If we are not sure, ask our legal team for advice.



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## WHAT TO WATCH OUT FOR

- Not exercising caution before using confidential information.
- Not checking that the information we have is public before using it.
- Discussing information obtained at work with our family or friends.
- Making recommendations to our family or friends about whether to buy or sell OceanaGold securities or securities of a business partner.

## BE CURIOUS. ASK YOURSELF

### CONSIDER

Is this information available outside of OceanaGold?  
Am I over-sharing?

### CHECK

Have I checked OceanaGold's policy on securities trading?

### CONFIRM

Have I done all I can to keep OceanaGold information confidential?



## Need help?

Ask the Legal team  
or go to:





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[ourcode.oceanagold.com](http://ourcode.oceanagold.com)