

# Code of Conduct

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## 1. Purpose of the Code

This Code sets out the behaviours required of directors and all employees of K&S Corporation Limited and its related bodies corporate (collectively “K&S”) to build long term sustainable value for our shareholders, while preserving and protecting our reputation and standing in our communities and with key stakeholders including customers, employees, suppliers, lenders and regulators.

This Code is the ultimate guide for how we do things at K&S. This Code describes the standards of conduct that we expect and connects our purpose, values, and goals.

This Code is supported by our detailed business policies. This Code does not address conditions of employment which are set out in personal contracts, awards or agreements, but is aimed at the standards of conduct generally required of directors and employees by K&S.

## 2. Our Guiding Principles

The guiding principles that underpin everything we do are:

- We will always conduct ourselves in a way that promotes long term value creation rather than short term gain.
- We recognise that our workplace involves sharing the roads with the general public and we commit to being safe and courteous in all of our interactions.
- We will always act legally, safely, professionally and with honesty and integrity and in accordance with the spirit of the law.
- We aim to provide secure and meaningful employment for our employees in a positive, sustainable and respectful workplace.
- We understand that we are ultimately accountable to our shareholders and we commit to continuing profitability and growth in value.
- In all of our dealings, we will put the interests of K&S ahead of our own personal interests and we will avoid any conduct that may be harmful to K&S’ reputation.
- We will foster long term relationships with our customers and suppliers based upon mutual benefit.
- As an organisation, we will support a culture based upon trust, respect, fairness and openness that embraces continuous improvement.
- We value the social licence to operate granted by our communities and we aim to minimise the impact of our operations on the environment.

### 3. Responsibility for Implementation

While directors are responsible for setting the guiding principles and values that underpin the way in which K&S conducts itself, the Managing Director and Executive Team are responsible for communicating and reinforcing the principles and values in this Code amongst all employees.

The Managing Director and the Executive Team will ensure that:

- all employees are made aware of the contents of this Code (and any changes to it); and
- at all times they role model the guiding principles and values in this Code.

### 4. Company Policies

K&S has implemented policies and procedures. Copies can be found on KasNet, the K&S Intranet.

Directors and employees are expected to be familiar with current policies and procedures and to comply with them at all times.

K&S has a program to review and update its policies and procedures on a regular basis. Any changes to those policies and procedures will be advised when they occur.

Specific responsibilities with which all directors and employees must comply include:

#### Compliance with the Law

We must conduct all of our activities within the law. There is no excuse for anyone knowingly breach the law while undertaking any activities on behalf of K&S.

#### Licences

Employees who operate company equipment that requires the operator to be licenced, must hold a valid and current licence whenever they operate such equipment. Any employee whose licence is cancelled must inform their supervisor immediately.

#### Duty of Care

Employers and employees have a legal duty of care that requires everybody, irrespective of their jobs, not to act or fail to act in any way that is or could be detrimental to the health, safety and welfare of themselves or others.

Directors and employees must ensure that at all times they comply with their obligations under workplace health and safety and chain of responsibility legislation.

#### Conflict of Interest

Directors and employees must avoid any conflict of interest between their obligations to K&S and their personal activities or interests and should not take improper advantage of their position within K&S or of access to information or knowledge gained in the course of their role with K&S.

### Trade Practices Legislation

All directors and employees must act in accordance with K&S' Trade Practices Policy and comply with trade practices legislative requirements, which prohibit anti-competitive arrangements including those which result in decreased competition or disadvantage to customers and consumers, through price fixing or other activities.

### Protection of Company Property

Employees are not permitted to use any property of K&S for their own use without approval from their manager or supervisor. Property in this context will include but is not limited to, equipment, computer hardware, networks and software. Employees are required to take reasonable care of K&S' property used in their jobs or entrusted to them.

### Confidential Information

Directors and employees must preserve the confidentiality of sensitive and proprietary information of K&S to which they may be given access. Employees must not disclose to any person or organisation any information which is confidential, or which could be regarded as sensitive to K&S' interests, without the express permission of their manager or supervisor.

### Inducements and Gifts

Decisions or activities for or on behalf of K&S must not be influenced through the offering or acceptance of inducements or gifts.

### Anti-Bribery Legislation

K&S is committed to acting fairly, honestly, with integrity and in compliance with the Anti-Bribery and Corruption Laws at all times. K&S does not tolerate any corrupt conduct (including bribery and fraud) in its business. K&S expects that all directors and employees will act fairly, honestly, with integrity and in compliance with legislation and that they will not engage in any form of corrupt conduct.

## **5. Compliance with this Code**

Compliance with this Code requires genuine commitment and the co-operation of every person. Any person who breaches this Code may be subject to disciplinary action.

Compliance with this Code includes a responsibility for each person to report any breach or possible breach of this Code of which a person becomes aware. The type of breach may range from dishonest behaviour, fraud, a breach of law, improper conduct or an unsafe work practice.

A report of possible breach or breach of this Code can be made to the Company Secretary, the Executive General Manager – Human Resources, or the Managing Director. Where you wish to make a confidential and/or anonymous report of actual or suspected misconduct or wrongdoing, this may also be done under, and in accordance with, K&S' Whistleblower Policy.

Any material breaches of this Code will be notified to the board of directors of K&S.

## 7. Review

The contents of this Code will be reviewed on an annual basis by the Company Secretary to ensure its effectiveness and relevance. This Code, and any changes to it, must be endorsed by the Board of Directors.

## K&S Corporation Board of Directors

Adopted:	27 <sup>th</sup> October 2004
Reviewed:	25 <sup>th</sup> May 2021
Review Date:	25 <sup>th</sup> May 2022