



Code of Conduct

Standards for ethical, lawful and respectful conduct.

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| VERSION | 1.0 |
| EFFECTIVE | February 2026 |
| APPROVED BY | Scott O'Brien Managing Director |

1 Purpose

Ironbark EV is committed to conducting its business with integrity, professionalism and respect. This Code of Conduct outlines the standards of behaviour expected of all people representing or engaging with Ironbark EV.

The Code supports ethical decision-making, lawful conduct and respectful interactions across all business activities.

2 Scope

This Code of Conduct applies to:

- Employees of Ironbark EV
- Contractors and subcontractors
- Suppliers, service providers and consultants
- Any other persons acting on behalf of or representing Ironbark EV

It applies across all workplaces, project sites, offices, customer locations and any situation where a person is representing Ironbark EV.

3 Core Principles

All persons covered by this Code are expected to:

- **Act honestly, ethically and with integrity**
- Comply with all applicable laws, regulations and contractual obligations
- Treat others with respect, fairness and professionalism
- Avoid behaviour that may damage the reputation of Ironbark EV

4 Lawful and Ethical Conduct

Ironbark EV expects compliance with all applicable laws, including but not limited to:

- Workplace relations and employment laws
- Environmental legislation
- Work health and safety legislation
- Anti-discrimination and equal opportunity laws

Unlawful, dishonest or unethical conduct will not be tolerated.

5 Respectful Workplace

Ironbark EV is committed to maintaining a workplace that is free from harmful behaviours. All interactions should be conducted in a respectful, inclusive and professional manner.

ZERO TOLERANCE FOR:

- Discrimination based on any protected attribute.
- Harassment, including sexual harassment.
- Bullying or intimidation.
- Victimisation of those who raise concerns.



We treat everyone with respect regardless of role, background or personal characteristics.

8 Confidentiality & Privacy



All confidential, sensitive or proprietary information must be handled responsibly and protected from unauthorised use or disclosure.

Privacy and confidentiality obligations must be respected at all times to protect our business, employees, and partners.

6 Health, Safety & Wellbeing

Safety is a shared responsibility. All persons covered by this Code are expected to prioritize the wellbeing of themselves and others.

CORE EXPECTATIONS

- Take reasonable care for your own health and safety and that of others.
- Strictly follow all safety instructions, procedures and site requirements.
- Promptly report hazards, incidents and unsafe behaviour immediately.

7 Conflicts of Interest

Individuals must avoid situations where personal interests conflict, or appear to conflict, with the interests of Ironbark EV.



Disclosure is Key

Any actual, potential or perceived conflicts of interest must be disclosed to management as soon as practicable. Transparency protects both you and the organization.



9 Gifts, Benefits and Hospitality

Gifts, benefits or hospitality must not be offered, accepted or solicited where they could improperly influence, or be perceived to influence, business decisions.

- Any gifts or benefits must be reasonable, transparent and lawful.
- Employees must exercise judgment and decline any offer that creates a conflict of interest.

10 Use of Company Property

Company property, resources and systems must be used responsibly and for legitimate business purposes.

- Misuse, theft or unauthorised use is not permitted.
- Assets should be protected from loss, damage, or theft.

11 Reporting Concerns

Any concerns regarding breaches of this Code of Conduct should be reported promptly through appropriate channels.

Whistleblower Protection

Reports will be handled confidentially and without retaliation where made in good faith. Ironbark EV is committed to protecting those who raise genuine concerns.

12 Breaches of the Code

Breaches of this Code may result in corrective action, including disciplinary action, contract termination or other appropriate responses, depending on the nature and severity of the breach.

This Code of Conduct will be reviewed periodically to ensure it remains current, effective and aligned with organisational values and legal obligations.