

Code of Conduct

Investigator Resources Limited

ACN 115 338 979

Reviewed/Approved by the Board	
Adopted	24 October 2019
Reviewed and Approved	20 November 2020
Reviewed and Approved	20 October 2022
Reviewed and Approved	28 January 2025

1. Introduction

- 1.1. Investigator Resources Limited (ACN 115 338 979) (“**Company**”) and its subsidiaries (collectively, the “**Group**”) are committed to the highest level of integrity and ethical standards in all business practices, free from all forms of discrimination, bullying and sexual harassment.
- 1.2. All employees of the Company, Company Directors, senior executives, temporary employees, contractors, consultants and relevant third parties (“**Employees**”) must comply with the Code.
- 1.3. The purpose of this Code of Conduct (“**Code**”) is to provide a framework for decisions and actions in relation to ethical conduct in employment. It underpins the Company’s commitment to integrity and fair dealing in its business affairs and to a duty of care to all Employees, clients and stakeholders. The document sets out the principles covering appropriate conduct in a variety of contexts and outlines the minimum standard of behaviour expected from Employees.
- 1.4. The objectives of this Code are to ensure that:
 - (a) high standards of corporate and individual behaviour are observed by all Employees in the context of their employment or engagement with the Group;
 - (b) Employees are aware of their responsibilities to the Group under their contract of employment and always act in an ethical and professional manner; and
 - (c) all persons dealing with the Group, whether it be Employees, shareholders, suppliers, customers or competitors, can be guided by the stated values and practices of the Group.
- 1.5. The Group is committed to complying with this Code and expects that all Employees comply fully with it. Employees should at all times comply with both the spirit as well as the letter of all laws which govern the operation of the Group and the principles of this Code. Further, Employees should always use due care and diligence when fulfilling their role or representing the Group and should not engage in any conduct likely to bring discredit upon the Group.
- 1.6. This Code must be read in conjunction with the other relevant policies to ensure its full understanding and compliance.
- 1.7. To the extent that there is any inconsistency between this Code and the Company’s Constitution, the Constitution will prevail.

2. Application

- 2.1. This Code applies to, but is not limited to:
 - 2.1.1. all Company executive and non-executive directors;
 - 2.1.2. all Company employees, officers, advisers, contractors, and consultants
 - 2.1.3. job candidates, student placements and volunteers;
 - 2.1.4. any of the Company subsidiaries and their relevant personnel;
 - 2.1.5. how the Company provides services to clients and how it interacts with other members of the public;

- 2.1.6. all aspects of employment, recruitment and selection, conditions and benefits, training and promotion, task allocation, shifts, hours, leave arrangements and workload;
 - 2.1.7. on-site, off-site or after-hours work; virtual/remote working, work-related social functions; conferences – wherever and whenever Employees may be as a result of their official duties;
 - 2.1.8. employee treatment of other employees, of clients and of other members of the public encountered in the course of their official duties.
- 2.2. Responsibility lies with every person covered by this Code to conduct themselves in accordance with this Code.
- 2.3. Copies of this Code and other relevant policies are available on the Company's website.
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3. Conduct expected of Employees

- 3.1. All Employees should:

Integrity

- (a) act honestly and in good faith at all times and in a manner which is in the best interests of the Group as a whole;

Conflicts of interest

- (b) conduct their personal activities in a manner that is lawful and avoids conflicts of interest between the Employee's personal interests and those of the Group and its customers. Where there is a potential conflict, the Employee should report that conflict to their manager, the Company Secretary or a relevant adviser;

Corporate opportunities

- (c) not take advantage of property, information or position, or opportunities arising from these, for personal gain or to compete with the Group;

Confidentiality

- (d) restrict the use of non-public information (whether specific to the Group or entrusted to it by others) except where disclosure is authorised or legally required;
- (e) not make improper use of any information acquired by virtue of being an Employee, including the use of that information for personal gain or the gain of another party or in breach of a person's privacy;

Trading in securities

- (f) comply with the Company's Securities Trading Policy when trading in securities, including trading in securities of the Company. The purpose of the Securities Trading Policy is to ensure compliance with the law and to minimise the scope for misunderstandings or suspicions regarding Employees trading in securities while in possession of non-public price sensitive information;

Responsibilities to key stakeholders

- (g) always deal with shareholders, clients, customers, suppliers, competitors and other Employees in a manner that is lawful, diligent and fair and with honesty, integrity and respect;

Protection and proper use of the Group's assets and property

- (h) ensure that the Group's assets and property (including intellectual property) are protected and only used for authorised and legitimate business purposes;

Anti-bribery and gifts

- (i) always comply with laws against bribery, corruption and related conduct applying to the Group in all the jurisdictions where the Group operates;
- (j) not offer any unlawful inducements, secret commissions or bribes to further the Group's business interests, and not accept any money or opportunity or other benefit that could be interpreted as an unlawful inducement, secret commission or bribe;
- (k) exercise care in accepting hospitality, entertainment or gifts over and above that required for the normal conduct of the business or which might compromise the Employee's impartiality;

Dealings with politicians and government officials

- (l) conduct any dealings with politicians and government officials which relate to the Group and its business activities at arm's length with the utmost professionalism;
- (m) not make any donation or other financial contribution to any political party or candidate for an election or sponsor any organisations (other than in a purely personal capacity) without seeking and obtaining prior written approval from the Company Secretary;

Privacy

- (n) must respect and safeguard the privacy of personal information held by the Group regarding its clients, customers, suppliers, Employees and others;

Compliance with laws and regulations

- (o) always act in a manner that is in compliance with all applicable laws and regulations. In addition, it is expected that all Employees will act in compliance with this Code and the Group's other policies as in force from time to time; and
- (p) report any actual or potential breaches of the law, this Code or the Group's other policies to their manager or the Company Secretary or a relevant adviser. If ever in doubt, Employees should seek advice immediately.

4. Employment practices

Equal Opportunity and Discrimination

4.1. The Company is committed to:

- (a) equal employment opportunity;

- (b) compliance with the letter and spirit of a full range of fair employment practices and anti-discrimination laws; and
 - (c) a workplace free from any kind of discrimination, harassment or intimidation of employees.
- 4.2. Discrimination is treating or proposing to treat someone unfavourably because of personal characteristics protected by law (as defined under the Federal discrimination laws, from time to time).
- 4.3. Discrimination can occur:
- (a) **Directly**, when a person or group is treated less favourably than another person or group in a similar situation because of personal characteristics protected by law;
 - (b) **Indirectly**, when an unreasonable requirement, condition or practice is imposed that has, or is likely to have, the effect of disadvantaging people with a personal characteristic protected by law.
- 4.4. The Company will promptly investigate all allegations of harassment, bullying, victimisation or discrimination and will take appropriate corrective action. Retaliation against individuals for raising claims of harassment or discrimination will not be tolerated.
- 4.5.

Sexual Harassment

- 4.6. The Company has a zero tolerance approach to sexual harassment or victimisation and is committed to taking all reasonable steps to prevent any person from engaging in acts of sexual harassment or victimisation in connection with employment or work with the Company.
- 4.7. Sexual harassment is a specific and serious form of harassment. It is unwelcome sexual behaviour, which could be expected to make a person feel offended, humiliated or intimidated.
- 4.8. Sexual harassment can take many forms, including physical, verbal, or written (including electronic).
- 4.9. Sexual harassment is covered in the workplace when it happens at work, at work-related events, between people sharing the same workplace, working remotely, or between Employees outside of work.
- 4.10. All Employees and volunteers have the same rights and responsibilities in relation to sexual harassment.
- 4.11. Conduct does not have to be repeated or ongoing to be sexual harassment. A single incident is enough to constitute sexual harassment – it doesn't have to be repeated
- 4.12. The Company will promptly investigate all allegations of sexual harassment (no matter how large or small or who is involved) and will take appropriate corrective action. Retaliation against individuals for raising claims of sexual harassment and victimisation will not be tolerated.

Workplace Health and Safety

- 4.13. The Company is committed to maintaining a healthy and safe working environment for its employees. All appropriate laws and internal regulations (including occupational health and

safety laws) should be fully complied with. All people have obligations to assist in ensuring that this situation is maintained at all times.

- 4.14. Misusing controlled substances or alcohol or selling, distributing, possessing, using or being under the influence of illegal drugs whilst on the job is prohibited and will not be tolerated.

Company Reputation

- 4.15. Employees must not act in any way that could cause harm to the Company's reputation or market position during or after their employment. Employees have a duty to act in a manner that merits the continued trust and confidence of the public.
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5. Accounting policies and disclosure

- 5.1. The Group is committed to delivering to shareholders and the market accurate, timely and up-to-date information within both the letter and spirit of the Listing Rules of the Australian Securities Exchange, all relevant laws and applicable accounting standards.
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6. Whistleblower protection

- 6.1. The Group has adopted a Whistleblower policy which promotes and encourages ethical behaviour and protection for those who report violations in good faith. The Group will ensure that Employees are not disadvantaged or discriminated against for reporting actual or suspected violations of this Code or other unlawful or unethical conduct and that matters are dealt with promptly and fairly.
 - 6.2. Please refer to the Company's **Whistleblower Policy** for further information, including the right to speak in confidence and to report our concerns.
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7. Compliance with this Code

- 7.1. The Company Secretary in conjunction with the Board has responsibility for monitoring and ensuring compliance with this Code, including the conduct of regular reviews of operations and general compliance.
 - 7.2. Failure to comply with this Code is considered a very serious matter, may breach the law and, in the case of any Employees, result in disciplinary action including termination of employment. In the case of contractors, a breach may result in termination or non-renewal of contractual arrangements.
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8. Training and Awareness

- 8.1. Failure to adhere to this Code will be considered a serious misconduct and may result in a disciplinary action which could include termination of employment or contractual arrangements.
- 8.2. All Employees will be provided a copy of this Code as part of the employee onboarding exercise and as and when there has been a change to this code. All employees will need to acknowledge that they have read and understood the Code on the training portal or other platforms as required by the Company.

- 8.3. Any questions in the application or the interpretation of this Code, you may contact your line manager or the Company Secretary.
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9. Further Assistance

- 9.1. Any questions in the application or the interpretation of this Code, you may contact your line manager or the Company Secretary.
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10. Code Review and Amendments

- 10.1. This Code must be reviewed by the Board at least **once every 2 years** or as may be required to ensure it is operating effectively. Any recommended changes must be approved by the Board.
- 10.2. The Company Secretary is authorised to make administrative and non-material amendments to this Code provided that any such amendments are notified to the Board at or before its next meeting.