



Our Code of Conduct

BRINGING OUR VALUES TO LIFE



LEGEND

THE POWER TO TRANSFORM

legend.com.au

A Message from the CEO

“

Every day, all of us at Legend Corporation work hard to build a valuable company that demonstrates repeatable processes, clear strategy, sustained profitable growth and employee purpose that will grow our business into something we should all be proud to be associated with.

While what we achieve is important – so is how we achieve it.

How we work is guided by values. They are Accountability, Teamwork, Integrity, Respect and Excellence. We are relentless in our pursuit of these values and they guide our decision making.

At Legend Corporation we are all about winning, but we care how we win. We strive for superior results through setting clear goals, defining responsibilities and being accountable for our actions. We are proud to have created a trusting, respectful and inclusive environment, where both personal and team growth, creativity and reinvention flourishes. It strengthens our relationships, builds trust in the communities we participate in and protects our business.

Our code sets a standard of behaviour and keeps us accountable. We may be tested at times, but we will not compromise on our values.

Our code has and will continue to guide us.

”



Bryan Tisher
Chief Executive Officer



Our Commitment

At Legend we are committed to doing the right thing in all aspects of our business. This requires that all of us, every day, exhibit an unwavering dedication to the highest ethical standards. We foster a culture that believes in the open-door policy, to encourage open communication, feedback and discussion on any matter of importance with any manager at any time.

Every employee carries a share of the responsibility for the conduct and success of our company. This shared responsibility requires that each of us understands and applies the core values that guide us to make decisions and how we execute our work.



ACCOUNTABILITY

We are accountable for the success of Legend and to fulfilling the commitments that we make to our customers, suppliers and each other. We respect our communities, the environment and take ownership for our actions



TEAMWORK

We encourage an environment of innovation, creativity and results through open and honest communication. We model leadership that teaches, inspires and promotes full participation.



INTEGRITY

We practice values-based leadership and demand of ourselves and each other the highest standards of individual integrity through direct, open and honest communication.



RESPECT

We are direct and open in our communication. We can achieve more as a team when we embrace diversity, challenge each other and recognise the value that comes from individuality, personal experience and varied heritages.



EXCELLENCE

We seek to profitably delight our customers. We challenge each other to improve our products, services, processes and each other. We strive to understand our end markets and our customers' businesses, to anticipate their needs today and in the future.



Work, Health and Safety

At Legend Corporation we are committed to providing healthy and safe working conditions. We will only be successful when everyone goes home safe and well every day.

Health and Safety is everyone's responsibility, and we all need to look out for one another's physical and mental wellbeing. As part of our commitment to mental wellbeing, Legend provides access to Employee Assistance (EAP) in all locations.

Legend Corporation is committed to practices that generate safe workplace actions, conditions and procedures, and we continually work to develop and maintain a safe and healthy operating environment.

✓ ALWAYS

- Comply with relevant health and safety requirements and use all personal protective equipment, and help others who work with us to do the same.
- Identify, assess and take steps to control health and safety hazards
- Immediately stop any work that appears unsafe
- Handle and dispose of all materials properly, safely and lawfully
- Be prepared for emergencies by making sure you, and any workplace visitors, are familiar with emergency procedures
- Report any accidents, injuries, illnesses, unsafe or unhealthy conditions, incidents, spills or release of materials to the environment to your immediate manager
- Act on all complaints or warnings raised with you

✗ NEVER

- Undertake work unless you are trained, competent, medically fit and sufficiently rested and alert to do so.
- Attend the workplace if you consumed any illicit drugs or alcohol.
- Smoke in undesignated areas on any of Legend sites.
- Assume that someone else will report a safety risk or incident or speak up.
- Forget our commitment to health and safety.



Our Expectations

OUR EXPECTATIONS OF YOU

We all have a responsibility to work in accordance with our values, as well as within the law. It is critical you understand our Code and how it applies to you.

When we refer to 'you' this includes all employees employed under the Legend banner. We also expect contractors, consultants and others who may be temporarily assigned to perform work or services for our Company to follow Our Code in connection with their work for us.

Legend expects that you:

- Will be guided in your decisions and actions by our Values
- Will act according to Our Code at all times
- Understand our procedures and standards that apply to how we work
- Know how, and when, to speak up
- Know that we do not tolerate retaliation against anyone for having the courage to speak up

OUR EXPECTATIONS OF LEADERS

We know the standard we walk by is the standard we accept. That's why if you are responsible for leading people at Legend, it is important that you role model our values by:

- Demonstrating positive behaviour
- Rewarding our people for demonstrating our values
- Holding everyone to account for breaching our Code of Conduct
- Embedding Our code into day-to-day activities and existing processes
- Making decisions that in the best interest of Legend Corporation
- Fostering an inclusive culture where everyone feels comfortable to speak up or ask questions with fear of retaliation

Consistent with our Code of Conduct and Values, our leaders are empowered to lift the performance of our people through regular coaching and feedback that is respectful and constructive.

CARING FOR OUR PEOPLE

Our people are our most important asset and are key to Legend's success. We aim to provide a healthy, safe and inclusive workplace, free from harassment and bullying. We want all of our people to be treated fairly, respectfully and with dignity and feel safe to speak up.



Workplace Equality and Inclusion

We will always employ, develop and promote based on merit and we do not tolerate any form of unlawful discrimination. Unlawful discrimination against a person based on personal attributes unrelated to job performance, such as race, gender identity, sexual orientation, intersex status, physical or mental disability, relationship status, religion, political opinion or parental responsibilities is prohibited.

We will strive to treat all existing and prospective employees fairly and evaluate them according to their skills, qualifications and capabilities. Personal relationships must not influence who we employ or reward.

OUR EXPECTATIONS OF YOU

You should always strive to be inclusive, collaborative and supportive. You should consider the impact your actions may have on others and treat everyone fairly and with respect.

Always make yourself aware of relevant cultural considerations and demonstrate respect when working with colleagues from diverse cultural backgrounds.

It is also important to support your colleagues to speak up if they believe they are experiencing harassment, sexual harassment, or bullying. If you witness this behaviour, you have a responsibility to speak up.

WHAT IS HARASSMENT, SEXUAL HARASSMENT AND BULLYING?

Harassment is an action or behaviour that would be reasonably viewed as humiliating, intimidating or offensive.

Sexual harassment is an unwelcome sexual advance, unwelcome request for sexual favours or other unwelcome conduct of a sexual nature, which may make a person feel offended, humiliated and/or intimidated. It may include unwelcome touching, suggestive comments or jokes, insults of a sexual nature, non-consensual acts of a sexual nature, or sending sexually explicit emails or messages. The impact of the action or behaviour on the recipient, not just the intent, is considered when determining whether the action or behaviour is harassment.

Sexual harassment is not always obvious, repeated or continuous. Whilst bullying is characterized by repeated behaviour, sexual harassment can be a one-off incident.

Bullying is repeated unreasonable behaviour directed towards a worker (or group of workers) that creates a risk to health and safety. Unreasonable behaviour is behaviour that a reasonable person, having considered the circumstance would see as unreasonable, including behaviour that is victimizing, humiliating, intimidating, offensive or threatening.

OUR EXPECTATIONS OF OTHERS WHO WORK WITH US

When working with Legend, all parties must respect that Legend values a diverse and inclusive workplace. We expect everyone who works at Legend will be treated with respect.



Respecting Human Rights

We must respect, and work to, uphold and advance human rights in everything that we do. We acknowledge that our activities have the potential to impact human rights and we manage this through our core business practices.

Preventing and addressing our own involvement in modern slavery is central to our sustainability approach including our commitment to running a safe, responsible and profitable business. Legend is required to comply with but seeks to exceed its obligations under the Modern Slavery Act 2018.

We set clear expectations that our employees and suppliers (including contractors and agents) should be alert to possible involvement in modern slavery and should work to prevent and address it.

We know that adopting high standards is not enough. Knowledge sharing, such as targeted training programmes for employees, and action, including mitigation measures where we see a risk of involvement, are vital to ensure Legend leads the way on improving Human Rights outcomes.

WE COMMIT TO OPERATING IN A MANNER CONSISTENT WITH THE:

- United Nations (UN) Universal Declaration of Human Rights
- UN Guiding Principles on Business and Human Rights
- Ten Principles of the UN global Compact
- Voluntary Principles on Security and Human Rights

✓ ALWAYS

- Undertake due diligence on our suppliers to assess their alignment with human rights.
- Report Evidence of any human rights concern to your immediate manager

✗ NEVER

- Threaten, punish, discipline or retaliate against anyone, inside or outside of Legend, for raising or helping to address a human rights concern.



Environment

We all need to demonstrate our environmental responsibility by understanding and minimizing impacts and contributions to lasting environmental benefits at every stage of our operations.

This applies to all our workers and aims to reduce environmental harm and the risk of prosecution for you and Legend Corporation. It supports our Environmental Management Plan (EMS) and encourages continual improvement.

OUR EXPECTATIONS OF EMPLOYEES

- Use due care, skill and foresight to minimize environmental harm
- Act in good faith when performing your role
- Speak up when you think an environmental document is missing or cannot be followed, when something appears wrong, when you are not sure what to do or when something could be improved.
- Immediately report environmental incidents to your immediate manager.
- All employees must be competent in the relevant environmental training for their work. Other training may be required depending on the task and nature of requirements.
- Work strictly in accordance with any environmental approvals
- Manage all waste and contaminated materials appropriately
- Minimize Noise and Emissions



*“Achieving a
better and more
sustainable
future for all”*



Anti-corruption

Our commitment to operating with integrity is part of who we are and what we do every day. We prohibit bribery and corruption in all our business dealings.

How we go about our business matters. Corruption misallocates resources, reinforces poverty, undermines the integrity of government and community decision making and results in waste of the opportunities that arise from resource development.

Compliance with anti-corruption laws is essential to protect Legend's reputation. All our employees, contractors, executive and third parties we deal with, including our suppliers, are required to comply with anti-corruption laws. No one has the authority to waive this requirement. Criminal penalties could result where anti-corruption laws are not respected.

Any concerns regarding corruption must be raised immediately.

OUR EXPECTATIONS OF YOU:

You must not authorise, offer, give or promise anything of value, directly or indirectly (for example, through a third party), to anyone to influence them in their role, or to encourage them to perform their work disloyally or improperly.

You should never make facilitation payments which are payments to government officials for routine services that are legally available.

You must get pre-approval before:

- Offering anything of value to an external person
- Engaging a supplier who will interact with others on our behalf
- Offering to undertake a community donation or project
- Offering to sponsor an event

If you offer or provide anything of value to an external person, the item must:

- Only be offered or provided for a legitimate business purpose
- Not be offered or provided to improperly influence or reward action
- Be legal under local laws
- Be of appropriate value and nature considering local customs and law, the position of the recipient and the circumstances
- Not be capable of causing reputational damage to Legend Corporation

OUR EXPECTATIONS OF OTHERS WHO WORK FOR US:

We expect everyone who works with us to share our commitment to integrity in all business dealings and in providing services to us.



Supplier Relationships

Relationship with suppliers (including vendors, contractors and consultants) make a significant contribution to the success of our company, and we want to make sure our suppliers have strong values and standards of behaviour.

OUR EXPECTATIONS OF YOU

You should always be careful when choosing a supplier and encourage them to uphold our standards and contribute positively to our reputation.

Only seek suppliers who share our commitment to:

- Lawful business practices
- High standards of business practices
- Management practices that respect the rights of all employees and local communities
- Minimizing impacts on the environment
- Providing a safe and healthy workplace

If there is any doubt about the supplier, or potential supplier's integrity or ability to perform the contract, you should address these issues immediately.

All procurement decisions should be based on the best value received, taking into account factors such as safety, price, quality, performance, history and suitability to meet Legend's standards. You should be satisfied that the supplier is reputable, competent and qualified to perform the work for which they are being hired, that they will operate safely and ethically, and that the compensation sought is reasonable.

You need to take steps to monitor and assess the supplier's performance. This will require, at a minimum, carefully checking invoices and raising queries with the supplier about any unclear or excessive charges. Always tell suppliers where they can access our Code so that they understand our expectations of them.

✓ ALWAYS

- Make sure suppliers are reputable, competent and qualified to perform the work, and that the compensation sought is reasonable.
- Make sure that agreements clearly state the services or products to be provided, the basis for payment and rate or fee.
- Conduct regular reviews of supplier relationships and performance

✗ NEVER

- Use suppliers who supply unsafe or environmentally irresponsible products or services, breach laws or regulations, use child or forced labour, or use physical punishment to discipline workers, even if it is allowed by local law.
- Suggest or directly request a personal gift, hospitality or anything of value from a supplier.



Conflicts of Interest

In line with our commitment to integrity, we must always be able to demonstrate that all decisions have been made in the best interests of Legend Corporation and free from personal bias. This means that we need to manage any actual, perceived or potential conflicts of interest.

A conflict of interest arises when an employee's position within the Company and their financial or other personal interests affect, could affect, or have the appearance of affecting, their judgement, objectivity or independence.

Examples include:

- Pursuing, awarding or maintaining Legend business opportunities for personal gain or the benefit of close relatives or friends.
- Holding outside jobs or affiliations, including directorships
- Receiving money, property, services or other forms of financial personal benefits from suppliers or other third parties doing, or proposing to do business with Legend
- Influencing the results of a bid or tender
- Offering jobs or affiliations to close relatives or friends
- Offering or accepting more than a modest amount of gifts, hospitality and entertainment

Nothing you do, professionally or privately, should conflict with your responsibilities to Legend Corporation, compromise the quality of your work performance or jeopardise your ability to make impartial business decisions in Legend best interest.

You should excuse yourself from any decision making and ongoing process where you have an interest that influences, or could be perceived to influence, your ability to make objective decisions for our company. This is important as an unmanaged conflict of interest could encourage unethical behaviour and lead to fraud.



Protecting Our Assets

We all have an obligation to protect Legend's assets and use them for their intended purpose.

Assets include physical and no-physical property, such as equipment, inventory, technology, money, intellectual property (IP) and Company information and data. Competitively sensitive and proprietary information are also considered assets and include:

- Operational data, such as production and maintenance data, master data and data related to our processes.
- Strategic and marketing plans
- Research and other technical data

OUR EXPECTATIONS OF YOU

You are responsible for appropriately using and safeguarding Legend's assets. You are also expected to respect both the physical and non-physical assets of others, and never knowingly damage or misappropriate those assets.

You should never share sensitive Company information without authorisation from your direct manager. If you are not sure what you can share, please speak with an executive leader of our business for clarity.

You should do what you can to prevent theft, misappropriation, damage or misuse of any of our assets. This includes not allowing physical assets to be destroyed, disposed of, sold, loaned or donated without appropriate approvals.

We are all responsible for protecting Legend's assets and this includes preventing and detecting fraud. Fraud is any intentional act of deception which is undertaken for personal or third-party gain and which may result in loss to Legend or another party. Examples include false statements, obtaining a personal commission for awarding work, falsification of expense claims, misuse of Legend information or theft.

OUR EXPECTATIONS OF OTHERS WHO WORK FOR US

We expect those who work with us to protect and not misuse our assets. If there is any uncertainty about the use of a Legend asset, please ask your direct manager.



Cybersecurity

We are committed to protecting personal and corporate security by increasing cybersecurity awareness and taking measures to protect our technology, systems and digital assets.

All Legend hardware, software and data is the property of Legend Corporation, this includes data stored on both personal and Legend devices.

The safeguarding of our technology systems and data is the responsibility of all employees and anyone who conducts business on behalf of our Company.

The use of Legend's technology and systems will be monitored, reported and, where required, blocked without notice to mitigate risk and comply with relevant laws, regulations and standards. Data stored on Legend technology systems may be accessed, reviewed or disclosed for the purpose of maintenance, business needs or to meet legal or policy requirements.

Inappropriate use of technology or data may expose our Company to risks, including viruses, security breaches, theft or loss of Legend property or reputational damage.

OUR EXPECTATIONS OF YOU

As members of our team, you are provided with the technology and data you need to undertake work for Legend. You must safeguard and use technology and data securely and appropriately, and protect them against damage, loss, theft, alteration and unauthorized access.

You must not use our technology or data to commit cybercrime, duplicate or sell software or media files, share your account password, use technology or data for non-Legend business purposes or cause reputational damage to Legend.

If you use our technology and data inappropriately, or inappropriate material is accessed or stored using our systems, disciplinary action may be taken and civil or criminal authorities may be notified. Inappropriate material includes pornographic or explicit images or text, materials promoting violence, hatred, terrorism or intolerance of others, or any other material that is deemed obscene or abusive.

You should never transfer, publish, remove, or delete Legend data or intellectual property without authorization.

OUR EXPECTATIONS OF OTHERS WHO WORK FOR US

If you have access to our equipment while working with us we expect that you fully comply with this section, including protecting Legend's cybersecurity.



Truthful Reporting

All data we create and maintain must accurately reflect the underlying transactions and events. There is never a justification for falsifying records, misrepresenting facts or engaging in any other fraudulent behaviour.

All financial transactions must be evidenced by appropriate source documents, verified for their validity and accuracy, properly authorized and accurately and completely recorded in the relevant accounts, systems and records. This includes, but is not limited to, bid and tender evaluations records, purchase orders, receiving documents, invoices, travel and expense records, journal entries, timesheets and tax findings.

OUR EXPECTATIONS OF YOU

If you are responsible for reporting information, whether financial or non-financial, you must make sure there are adequate controls to achieve truthful, accurate, complete, consistent, timely and understandable reports.

You should only report accurate data and information regarding Legend or its business activities.

You need to understand and comply with all applicable financial, regulatory and other applicable reporting requirements, laws and regulations in the relevant jurisdiction.

If you have any concerns about the validity of any reporting process or record-keeping activity, or believe you are being asked to create false or misleading information, you must report it immediately.

OUR EXPECTATIONS OF OTHERS WHO WORK FOR US

If you are responsible for reporting on behalf of Legend, we expect that the reports and information are transparent and reflect the underlying transactions and events as outlined in this section.

✓ ALWAYS

- Cooperate with our internal and external auditors and disclose all pertinent information that could reasonably impact the results of the audit.
- Speak up immediately about any suspicions of fraud.
- Make sure you only submit and approve legitimate and reasonable expenses that are supported by valid receipts and invoices.

✗ NEVER

- Falsify any record or make a false or misleading entry including omitting any information.
- Circumvent review and approval procedures.
- Allow others to do anything that would compromise the integrity of Legend's records or reports
- Disclose or disseminate confidential or commercially sensitive information without prior authorisation



Personal Information and Privacy

We respect your personal information and privacy, and expect you to respect the personal information and privacy of others.

Personal information is any information which could identify an individual, either from that information alone or in combination with other information which is reasonably likely to come into the possession of Legend Corporation.

To the extent permitted by law, we reserve the right to monitor or audit employee use of Legend information systems, and access electronic communications or information stored on systems, devices or equipment for maintenance, business needs or to meet legal or policy requirements.

OUR EXPECTATIONS OF YOU

It is important you follow our standards and procedures on personal information and privacy.

You should only collect, disclose, retain or process personal information that is necessary to meet business requirements, as permitted by law and in places we operate.

If you do not want others to read an email, you should reconsider sending it. If an email relates to a personal matter, you should use a personal email account.

Always treat the personal information and privacy of others with respect.

OUR EXPECTATIONS OF OTHERS WHO WORK FOR US

If you work with us, you must uphold our standards and respect the personal information and privacy of our people while you are working with us.

✓ ALWAYS

- Comply with legal requirements that apply to the collection, use, disclosure, retention and processing of personal information
- Only collect, use, disclose, retain and process personal information that is necessary for legitimate business activities and functions.

X NEVER

- Access personal information unless you have appropriate authorization and a clear business need.
- Provide personal employee information to anyone inside or outside of Legend without proper authorization.
- Conduct reference or security checks without proper authorization of the consent of the individual.



Open Communication

SPEAKING UP PROTECTS EVERYONE

When concerns are raised it helps Legend Corporation identify and address the matter and improve how we work.

We know that speaking up takes both courage and integrity, and we respect this by treating your concern sensitively and committing to investigate where appropriate.

Our people are our most important asset, and we want you to feel supported in speaking up, there are several ways you can do this.

WHAT HAPPENS WHEN YOU SPEAK UP?

All concerns will be treated seriously and respectfully, and we aim to respond to these in a timely manner.

| CONCERN RAISED | RESOLUTION | INVESTIGATION | OUTCOME |
|--|---|--|--|
| Be open and honest and provide as much information as possible if you raise a concern through: whistleblower@legendcorporate.com.au You can choose to remain anonymous. | In some cases, advice support and guidance can help you resolve your concern. | All concerns are treated seriously and we aim to investigate in a timely manner. Investigations may be performed by a business leader, HR or a third party investigator. | Where an investigation is performed you will be provided with contact information so that you can communicate with the investigator and request updates. You will be notified of outcomes when the investigation is complete. |

SUPPORT

If you have concerns at any stage of the process, please speak to your immediate manager, a senior manager, or the People and Culture Manager.

Remember, our Employee Assistance Program is available if you need any support, guidance or counselling:

PeopleSense

Australia: 1300 307 912

New Zealand: 8 9388 9000

www.peoplesense.com.au

*“Legend Corporation,
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