



Twenty Seven Co. Limited

Code of Conduct and Ethics

September 2021

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1. Introduction

This Code of Conduct (**Code**) and the policies contained within it aim to promote the highest ethical and professional standards for all persons providing services to Twenty Seven Co. Limited and its related companies (**Twenty Seven Co.**).

As a listed public company, Twenty Seven Co. and its personnel have certain legal obligations with respect to a general duty of care. In addition to meeting the statutory requirements, this Code is designed to instil a level of values under which all personnel of Twenty Seven Co. will operate.

All personnel are requested to confirm that they have understood and comply with the Code by signing the acknowledgement on the final page of this document.

CORE PRINCIPLES

1. You have a duty to use due care and diligence in fulfilling your duties. The company has a policy of “Zero harm, 24/7”.
2. You must act honestly, ethically, in good faith and in the best interests of Twenty Seven Co. as a whole.
3. You must not make improper use of information acquired as a result of your relationship with Twenty Seven Co..
4. You must not allow personal interests, or the interests of any associated person, to conflict with the interests of Twenty Seven Co..
5. Confidential information you receive in the course of business remains the property of Twenty Seven Co. and it is improper to disclose it, or allow it to be disclosed, unless that disclosure has been authorised by Twenty Seven Co..
6. You must adhere to the continuous disclosure protocol of Twenty Seven Co..
7. You should not engage in conduct likely to bring discredit upon Twenty Seven Co..
8. You will not knowingly breach any law under which Twenty Seven Co. operates.
9. You must show respect for your fellow workers, the Board of directors, shareholders, contractors, suppliers and competitors.
10. You must be aware that enquiries for certain information may only be handled by relevant authorised personnel of Twenty Seven Co..
11. You must maintain a professional working relationship with fellow personnel. Any form of discrimination or harassment will not be tolerated.

2. Disciplinary action

Adherence to this Code and the policies contained within it is considered mandatory. Any breach of the Code will be treated with utmost seriousness and if you are found to be in breach you may face appropriate disciplinary action, including being placed on probation, or, in the case of serious breaches or multiple breaches, dismissal.

3. Business ethics

Professional conduct

You must act with professionalism at all times and conduct yourself in a professional, business-like manner, whilst performing duties for Twenty Seven Co..

Twenty Seven Co. is listed on the Australian Securities Exchange. Your activities reflect directly on the profile of Twenty Seven Co. and therefore the need for you to display a high level of professional conduct at all times is of paramount importance.

The level of professional conduct expected extends to:

- Maintaining a high level of integrity, honesty and confidentiality.
- At all times displaying a professional attitude and acting in the best interests of Twenty Seven Co. and in accordance with this Code.
- Acting in a professional manner at all times whilst undertaking company duties or representing Twenty Seven Co. in any capacity.
- Promoting Twenty Seven Co. and its products wherever possible and always displaying a positive attitude towards the Twenty Seven Co..

Compliance with laws and regulations

Twenty Seven Co. must comply with a number of laws and regulations, and it is important that you are aware of such laws and ensure compliance at all times.

The laws and regulations can be broadly categorised as follows:

- Corporations Law
- ASX Listing Rules
- ASIC Policies and Regulations
- Taxation Laws
- Occupational Health and Safety Legislation
- Other laws and regulations (Trade Practices Law, Equal Opportunities legislation, Environmental legislation, Common Law, Criminal Law, etc.)

Some laws and regulations can be quite onerous and failure to comply can result in large financial damages and in some circumstances, even jail. On this basis, it is vital that you are very careful in what you say and do. If you have any doubt whatsoever on any matter, policy or procedure, you should always seek advice before acting.

Continuous disclosure protocol

The Company has implemented a Continuous Disclosure & Communications Policy that outlines the processes followed by Twenty Seven Co. to ensure compliance with

its continuous disclosure obligations and the corporate governance standards applied by Twenty Seven Co. in its market communications practices.

You should be aware that under the above protocol you have a responsibility to bring any matter which you believe would trigger the continuous disclosure requirements to the attention of either your department manager, the Chairman, a Director or the Company Secretary. Such issues will in turn be brought to the attention of all the Directors.

Confidentiality

During your employment with the Company you may become aware of information that is commercially sensitive information and is not in the public domain. If information is disclosed to you on a confidential basis in the course of your employment it should remain confidential.

It is your responsibility to take all appropriate and prudent steps to ensure that the confidentiality and security of information is maintained. Your obligation with respect to confidentiality of information survives the termination of your employment with Twenty Seven Co..

4. Handling enquiries

As a company whose securities are listed on the Australian Securities Exchange, Twenty Seven Co. has obligations to disclose certain information, so that this information is then available to shareholders and the investing public in general.

From time to time, people will seek to obtain information which is not readily available to the investing public by telephoning the registered office directly. These people may include:

- Shareholders of the company;
- The media;
- Potential investors in the company;
- Brokers and analysts; and
- Competitors

These enquiries may relate to a wide variety of matters, including:

- Drill results and assays
- Exploration plans
- The early release of financial data;
- Rumours about proposed business strategies and operations

The law imposes obligations on when and how the company must disclose information. By disclosing any information, you may unintentionally result in the company breaching the law. Accordingly, staff must only disclose information which they know is in the public domain – from Annual Reports, ASX announcements, and other official reports already available to the market. If there is any doubt about the proper way to handle an enquiry, or if the enquirer is being “pushy” or suspiciously persistent, the enquirer should be referred to the Chairman or a Director.

Only the Chairman and Directors are authorised to provide non-public information to any party, and then only within the confines of the ASX's continuous disclosure regime.

5. Privacy policy

At Twenty Seven Co. we are committed to ensuring the confidentiality and security of the information provided to us. To comply with legal requirements and to run our business effectively it is necessary for us to collect certain personal information about the people whom we employ or with whom we deal. At a minimum this usually includes information such as people's names, addresses and contact details.

Twenty Seven Co. takes all reasonable security measures to protect personal information from loss, unauthorised access, destruction, misuse, modification or disclosure. As far as permissible under law, Twenty Seven Co. accepts no responsibility for the unauthorised use of personal information held by it.

6. Conflicts of interest

You must not take improper advantage of your position to gain, directly or indirectly, a personal advantage or an advantage for any associated person, which might cause detriment to Twenty Seven Co..

Your personal interests, and those of your family, must not be allowed to prevail over the interests of Twenty Seven Co.'s shareholders generally. You should avoid conflicts of interest, wherever possible. Full disclosure of any conflict, or potential conflict, must be made to the Chairman, CEO/Managing Director, department manager or a director of the company.

7. Occupational Health and Safety policy

Twenty Seven Co. is committed to ensuring the health, safety and welfare of all persons (including directors, staff, contractors, clients and the public) at its workplaces and acknowledges that Occupational Health and Safety (OH&S) is a critical component of business and management activities. Twenty Seven Co. recognises its responsibilities under Commonwealth and State legislation, regulations, and codes of practice.

To maintain a safe and healthy workplace Twenty Seven Co. will:

- seek to ensure its facilities operate to the highest standards to protect directors, staff, contractors, visitors and the public;
- provide safe systems of work developed in consultation with staff taking into account the hazards identified, risks assessed and the effective control of those risks;
- provide appropriate information, instruction, training and supervision on systems of work for all who work in its business activities so they are able to comply in a responsible manner;
- consult with staff and encourage initiatives that contribute to a safer and improved working environment;
- ensure the reporting and investigation of injuries, illness, incidents and near misses is conducted in a consultative manner to prevent recurrence;
- measure and evaluate OH&S performance by regular monitoring audits and inspections of compliance with Twenty Seven Co. policies and legal requirements; and
- regularly review the OH&S component of the HSE Management System to ensure its appropriateness and effectiveness in managing systems of work and OH&S responsibilities.

All staff have strict obligations and responsibilities under this policy to put safety first, to work safely and to report unsafe work practices or situations to their supervisor. The Board strongly endorses this policy and will regard breaches of it by any staff member, very seriously.

8. Equal opportunities policy

Twenty Seven Co. is an equal opportunity organisation. We provide equality of opportunity to all employees, contractors, applicants for employment, investors, clients and others who have contact with us. We deal with them without regard to discriminatory factors such as race, sex, impairment or age.

The Company has developed a Diversity Policy which can be viewed at the Company's web site.

We are committed to ensuring that Twenty Seven Co. provides a workplace free from discrimination, harassment, vilification, victimisation and bullying. We also interact with external parties in a professional manner, without discrimination, harassment, vilification, victimisation or bullying.

It is the responsibility of all personnel to be familiar with this policy and to ensure that proper standards of conduct are upheld in the workplace and in the way we treat external parties and how they treat us. Everyone should take all reasonable steps to ensure that the work environment is free from inappropriate conduct.

If you have any questions about this policy or concerns about inappropriate conduct in the workplace you are encouraged to raise these concerns in accordance with this policy.

Twenty Seven Co. encourages a friendly, enjoyable working environment, based on mutual respect, teamwork, cooperation and professionalism.

Further information regarding government legislation concerning equal opportunity in the workplace can be found at the Australian Human Rights & Equal Opportunity Commission website: <http://www.hreoc.gov.au/index.html>

9. Company Policies and Procedures

The Company has developed many policies and procedures for the safe and efficient operation of the Company's business activities. Some of these policies and procedures are available on the Company's web site whilst other policies and procedures are internal documents which will be stored on the Company's server.

A copy of all policies and procedures will be made available to all employees, directors, officers, contractors and other agents of the Company who must in turn comply with all such policies and procedures.

The Board may amend, vary or introduce new Company policies from time to time and all employees, officers, directors, contractors and other agents of the Company must:

- make themselves familiar with such amended or new policies and procedures; and
- adhere to all policies and procedures in place from time to time.

10. Code of Conduct acknowledgement

Upon reading Code of Conduct, please sign and return this page to the Company Secretary.

I acknowledge that I have read and understood the Code of Conduct and agree to comply with its provisions.

Name: (print)

Signature:

Date: