

Approved by the Board 1 April 2025

SILEX SYSTEMS LIMITED ACN 003 372 067



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### 1 Purpose

The Silex Systems Limited (**Silex** or the **Company**) Code of Conduct (the **Code**) explains the standards of conduct that the Company expects in the conduct of its operations. The Code incorporates Silex's fundamental conduct and business values and summarises key policies, which are based on standards that underlie the Company's business ethics and professional integrity.

The Code has been approved by the Silex Board of Directors and applies to all permanent, temporary, casual and contract employees, including Executive and Non-Executive Directors (**Directors**) and Executive and Senior Management of Silex and its associated businesses and to consultants and contractors of Silex.

#### 2 Commitment to the Code

Silex is committed to promoting the highest standard of ethics, integrity and behaviour.

Employees of Silex are responsible for observing expected standards of behaviour and business values and remain responsible and accountable to providing a work environment which actively promotes best practice.

The Code does not form part of any employees' contract of employment. In addition, Executive and Non-Executive Directors are bound by their own professional code of conduct, which this Code is expected to enhance, not replace.

### 3 Principles of the Code

As a representative of Silex, all directors, executives and employees are expected to conduct themselves in a professional and courteous manner and to observe the following standards of behaviour (both inside and outside the workplace) where the participant may be perceived as representing the Company. Directors, executives and employees have an individual and collective responsibility to:

- Comply with all laws, company policies, procedures, rules, regulations and contracts in the locations in which Silex operates;
- Comply with reasonable and legal instructions by the Company;
- Adhere to the Company's Work Health and Safety Policy at all times;
- Maintain a safe work environment in accordance with the Company's policies regarding discrimination and harassment, sexual harassment, equal employment opportunities, occupational health and safety, and any other Company policies and procedures;
- Treat all stakeholders (internal and third parties) in a non-discriminatory manner, with honesty, respect, dignity and courtesy;
- Protect the financial and other interests of Silex and commit and expend funds with the same care and discretion that they would their own;



- Use good judgement to ensure that Silex assets are not misused or wasted and comply with the Silex Authority schedule;
- Not engage in or tolerate bribery or any other form of corruption;
- Whilst in the office or at a worksite, not engage in any other income or benefit-related activities and do not use Company property or systems for personal gain or benefit;
- Avoid any situations involving divided loyalty or a conflict between their personal interests
  and those of the Company. Employees faced with conflicting interests must declare any
  interest (direct or indirect) that may conflict or be perceived to conflict with the best interest
  of Silex, or may otherwise adversely affect Silex;
- Promptly report any violations of law, ethical principles or policies that come to your attention;
- Uphold the highest level of honesty and integrity when carrying out duties and responsibilities;
- Maintain confidentiality of Silex 's operations, strategy and finances;
- Acknowledge that all confidential and proprietary information, records or other materials
  received in the course of the exercise of their duties remain the property of the Company.
  It is improper for this information to be disclosed, or allow it to be disclosed, unless that
  disclosure has been authorised by the Company, or the person from whom the information
  is provided, or is required by law; and
- Not engage in conduct likely to bring discredit upon the Company.

#### 4 Confidential Information

All directors, executives and employees of the Company must ensure that confidential information relating to the Company, its customers, its operations, or any other commercially sensitive matter, are not given either inadvertently or deliberately to third parties without the consent of CEO/Managing Director or the Board. Other than in circumstances required by law, there is no reason for Senior Executives to disclose confidential information. Confidential information which is to be disclosed to legitimately interested third parties will only be made so available after appropriate authorisation procedures have been followed.

All directors, executives and employees of the Company will maintain and observe their obligations of confidentiality and proper use of information even after leaving the Company's employment or service.



#### 5 Control of Information

Employees must:

- Return all Company property including any documents or confidential information, on termination or on the request of the Company or its representative; and
- If requested by the Company or its representative, destroy or delete any confidential information stored in electronic, magnetic or optical form so that it cannot be retrieved or reconstructed.

### 6 Intellectual Property

Intellectual property includes the rights relating to scientific discoveries, industrial designs, trademarks, service marks, commercial names and designations, and inventions and is valuable to the Company. The Company is the owner of intellectual property created by employees in the course of their employment unless a specific prior agreement has been made. Employees must obtain written permission to use any such intellectual property from the Company Secretary before making any use of that property for purposes other than as required in their role as employee.

### 7 Consultant Responsibilities

Individuals or organisations contracting to, consulting for, or representing the Company, or both, must comply with this Code in the same way as the Company's employees. The Company's employees who engage contractors or consultants should ensure that they are provided with a copy of relevant the Company's policies, including this Code.

### 8 Insider Trading

All directors, executives and employees must observe the Company's Securities Trading Policy. In conjunction with the legal prohibition on dealing in the Company's securities when in possession of unpublished price sensitive information, the Company has established specific time periods when directors, executives and employees of Silex are permitted to buy and sell the Company's securities.

#### 9 Guidelines

As part of Silex's commitment to the highest standards of ethics, integrity and behaviour, the Company will treat any breach of the Code as a serious matter which may result in immediate disciplinary action, up to and including termination of employment. If any laws are contravened, then legislative enforcement procedures will apply. Silex has a zero tolerance for wilful breaches of the Code. Everyone who the Code applies to is expected to act in a manner consistent with the Code. Not following the Code is a serious matter and breaches will be investigated. Some breaches may simply incur a warning, however, breaches that are more serious may result in termination of employment. All material breaches will be reported to our Board.



#### 10 Review

The Board will review this Code periodically to ensure that it is operating effectively and to assess whether any changes are required. The Code may be amended by resolution of the Board.

٧	ersion	Date Issued	Approval
	0	03-May-2017	Silex Systems Limited Board of Directors
	1	01-Apr-2025	Silex Systems Limited Board of Directors

Note: Previous versions of this Policy date back to 08-Oct-2003