September 2026

POLICY

Workplace Behaviour

1. Introduction

Cyprium Metals Limited[1] ('**Cyprium**', or the '**Company**') is committed to:

- fostering a workplace environment that reflects our values;
- promoting a safe work environment through positive and supportive workplace behaviours; and
- resolving conflicts or concerns regarding workplace behaviour in a fair and constructive way.

The requirements in this Policy are intended to reinforce and reflect our values and should be read in conjunction with our Code of Conduct and Whistleblower Policy.

2. To whom does this policy apply?

This Policy applies to all:

- Cyprium directors, employees and contractors; and
- persons present at a Cyprium site or workplace, including consultants, contractors, subcontractors, labour hire personnel and secondees,

(each, a '**workplace participant**').

This Policy applies wherever and whenever there is a relevant connection between the behaviour or activity and working with Cyprium. For example, this Policy also applies to behaviour at work-related functions and places you visit for work, such as:

- work lunches, conferences, Christmas parties and contractor/consultant premises; and
- other functions sponsored by, or relating to, the Company.

Conduct which involves the use of Cyprium IT devices and/or the Company's IT network also has a relevant connection with work.

3. Discrimination, harassment, bullying and victimisation

Cyprium is committed to promoting a work environment where all workplace participants are treated fairly and with respect, and free from inappropriate workplace behaviours, including unlawful discrimination, harassment, vilification and bullying.

All workplace participants should be aware that unlawful discrimination, harassment, vilification and bullying may also breach equal opportunity and anti-discrimination laws in each jurisdiction where Cyprium undertakes its business.

[1] A reference to Cyprium includes each of its subsidiaries (from time to time), unless the context requires otherwise.

Discrimination

Unlawful discrimination in employment occurs when a person is treated less favourably in their employment because of a '**protected attribute**' or reason. What constitutes protected attributes and reasons differs under different state and federal laws, but irrespective of which law applies, this policy prohibits unlawful discrimination.

Examples of protected attributes under relevant laws (collectively referred to in this policy as '**EEO Laws**') include race, religious belief, disability, gender or gender identity, pregnancy, childcare responsibilities, sexual orientation and age. A more detailed list of protected attributes under EEO Laws are set out in **Attachment 1** to this policy.

It is also possible to discriminate against a person indirectly by imposing a term or condition which is, or may be perceived to be, more difficult for a person with a protected attribute to meet. For example, it might be indirect sex discrimination to have a requirement that you must be 180cm tall to do a particular job. Such a requirement could be discriminatory (ie, on the basis that it is perceived to disadvantage one gender where that gender is shorter on average than the other gender), if, in fact, the work could be arranged so that the height requirement was not necessary.

Harassment

Harassment is unwelcome conduct that a reasonable person would expect to offend, humiliate or intimidate another person. Harassing a person because of one of the protected attributes referred to above is unlawful.

Sexual harassment

Sexual harassment is unwelcome conduct of a sexual nature, which makes a person feel offended, humiliated or intimidated. Conduct can amount to sexual harassment even if the person did not intend to offend, humiliate or intimidate the other person.

Sexual harassment does not have to be directed at a particular individual to breach the law or this policy. Behaviour which creates a hostile working environment for other workplace participants can also be unlawful.

Examples of sexual harassment include:

- physical contact such as pinching, touching, grabbing, kissing or hugging;
- staring or leering at a person or at parts of their body;
- sexual jokes or comments;
- requests for sexual favours;
- persistent requests to go out, where they have been refused;
- sexually explicit conversations;
- displays of offensive material such as posters, screen savers, Internet material etc;
- accessing or downloading sexually explicit material in a workplace setting, or on a Cyprium IT device or the Cyprium IT network;
- suggestive comments about a person's body or appearance; and
- sending offensive emails, attachments or text messages.

However, conduct will not be sexual harassment if a reasonable person, having regard to all the circumstances, would not have anticipated that the conduct would offend, humiliate or intimidate the other person.

Conduct between colleagues which is welcome and consensual is also not sexual harassment, however, workplace participants must take care not to offend others around them.

Bullying

Bullying is repeated, unreasonable behaviour, directed towards an individual or group, that creates a risk to health and safety. Unreasonable behaviour means behaviour that a reasonable person, having regard to all the circumstances, would expect to victimise, humiliate, undermine or threaten.

Behaviours that may constitute bullying, include:

- demeaning language;
- threats, abuse or shouting;
- coercion;
- isolation;
- inappropriate blaming;
- ganging up;
- constant unconstructive criticism;
- deliberately withholding information or equipment that a person needs to do their job; and
- unreasonable refusal of requests for leave, training or other workplace benefits.

It is not bullying for a manager or supervisor to counsel a workplace participant about their performance - performance counselling is a necessary part of ensuring that workplace participants meet the standards of work and behaviour required by Cyprium.

Other reasonable management actions, such as taking disciplinary action, giving work directions and orders, and allocating work in accordance with business needs and systems, also do not constitute bullying provided that the relevant action is done in a respectful and professional manner.

Victimisation

Victimisation is where a person is the subject of some type of retaliation or detriment because they have lodged a complaint, they intend to lodge a complaint or they are involved in a complaint, relating to or involving allegations of unlawful conduct or other misconduct (e.g., a witness).

Workplace participants must not retaliate against a person who raises, or is otherwise involved in, a complaint, nor subject them to any detriment.

Vilification

Vilification is a public act which incites hatred, severe contempt or severe ridicule of a person or group, for example, because of race, homosexuality, transgender status, transsexuality or HIV/AIDS. Vilification is a particularly serious breach of EEO laws and will be dealt with accordingly.

Important note about Intention

Conduct can breach this policy or a corresponding legal requirement even if there was no intention to discriminate, harass or bully another workplace participant. For example, a colleague may find a comment offensive or humiliating even though it is intended to be joking or teasing.

For this reason, and consistent with our values, it is important that all workplace participants consider the impact of their behaviour on others, and how behaviours may be perceived by others.

4. Workplace rights and responsibilities

All workplace participants

All workplace participants are required to understand the letter and spirit of the laws and regulations relevant to their work and place of work, and to comply with those legal requirements. Without limiting the generality of the foregoing, all workplace participants must:

- ensure they do not engage in any unlawful conduct towards other workplace participants, customers/clients or others with whom they come into contact through work;
- ensure they do not aid, abet or encourage other persons to engage in unlawful conduct;
- follow the grievance procedure in this Policy if they experience any unlawful conduct;
- report any unlawful conduct they see occurring in the workplace in accordance with this policy; and
- maintain confidentiality if they are involved in a complaint procedure.

Our leaders

Our leaders are also expected to:

- be role models, demonstrating expected standards of behaviour;
- take steps to promote awareness of the obligations of workplace participants under this Policy; and
- intervene and respond in accordance with this Policy if they become aware of inappropriate behaviour.

5. Workplace behaviour grievances

Cyprium has a grievance procedure for dealing with these issues, with options available to suit the circumstances of each individual situation (the '**Grievance Procedure**'). The Grievance Procedure is set out in **Attachment 2** to this policy.

Under the Grievance Procedure, complaints may be managed formally or informally, depending on (among other things) the nature of the complaint and after taking into account how the person making the complaint would like it to be handled.

The manner in which a grievance will be handled is at the discretion of Cyprium.

If a workplace participant feels that they have been subjected to any form of unlawful conduct contrary to EEO laws or this Policy, or a workplace participant observes a colleague or fellow workplace participant being subjected to such conduct, they must not ignore it.

A Grievance Officer, or a supervisor or manager, who becomes aware of behaviour that does not comply with this Policy may take action under the grievance procedure even though no complaint has been made.

If a workplace participant is unsure about how to handle a situation and is also unsure if they want to make a complaint they should contact a Grievance Officer for support and guidance.

Confidentiality

All workplace participants involved in the complaint must maintain confidentiality, including the workplace participant who lodges the complaint. Spreading rumours or gossip may expose workplace participants to a defamation claim.

The Grievance Officer will endeavour to maintain confidentiality of complaints and the complaint procedure as far as is reasonably practicable. However, it may be necessary to speak with other workplace participants in order to determine what happened, to afford fairness to those against whom the complaint has been made and to resolve the complaint.

If a complaint is raised and it appears that unlawful conduct has potentially occurred, Cyprium will take such actions in relation to the complaint as the Company considers appropriate, including reporting to relevant authorities as appropriate.

Support person

An individual involved in a complaint may discuss the complaint with a designated support person or representative (which person or representative is not a workplace participant employed or engaged by Cyprium). However, the support person or representative must also maintain confidentiality.

Possible outcomes

The possible outcomes arising from a complaint will depend on the nature of the complaint and the procedure followed to address the complaint (refer to section 6 below).

If a workplace participant considers that a grievance has not been dealt with in accordance with this policy, they may escalate their concern to the Company Secretary (or, in the case of a complaint involving the Company Secretary, the Chief Executive Officer[2]) for a review of the process to be conducted.

Grievance Officers

Cyprium has designated the following persons as Grievance Officers for the purposes of this Policy:

- any member of the Human Resources team at an operating site or corporate head office; and
- the Company Secretary (or their delegate).

6. Breach of this policy

A workplace participant that breaches this policy may be subject to disciplinary action which may include termination of employment or contract. Conduct that breaches this policy may also breach other Cyprium policies, including (for example) the Code of Conduct and Cyprium's IT policies.

Conduct which breaches this policy may also be unlawful conduct and a workplace participant can be named personally as a respondent to a legal complaint. In addition, workplace participants who aid, abet or encourage other persons to engage in unlawful conduct can also be personally liable under the law.

If a person makes an unfounded complaint or a false complaint in bad faith (eg, making up a complaint to get someone else in trouble or making a complaint where there is no foundation for the complaint), that person may be subject to disciplinary action. They also put themselves at risk of a defamation claim.

7. Administration of this policy

Training

All Cyprium employees will be required to undertake periodic training in relation to awareness and expectations of standards of workplace behaviour as outlined in this policy, as part of the Company's compliance training cycle. Cyprium leaders, including all persons at manager level or above, will be required to undertake training on an annual basis.

A copy of this policy will be made available as part of the Company's normal induction procedures.

Review of this Policy

This policy will be reviewed periodically to assess whether it continues to meet its purpose and objectives in the context of (among other things) applicable standards and relevant regulatory requirements, as well as community expectations. Any amendment to this Policy requires the approval of the Cyprium Board.

A copy of this Policy will be available on the Company's website at: https://cypriummetals.com/about-us/corporate-governance/.

[2] If the role of CEO is performed by an Executive Chair, a reference to the CEO in this document is a reference to the Executive Chair.

Attachment 1
Protected Attributes

The following are '**Protected Attributes**' under Australian laws as at the date of this policy. Additional attributes may apply in one or more jurisdictions in which the Company operates its business (from time to time).

- race (including colour, nationality, descent, ethnic, ethno-religious or national origin)
- religious belief or activity
- sex
- marital status, relationship status
- pregnancy (including potential pregnancy)
- homosexuality, transsexuality, transgender, gender identity, sexuality, sexual preference, lawful sexual activity
- carers' responsibilities, family responsibilities, carer or parental status, being childless
- disability, including physical, mental and intellectual disability
- breastfeeding
- age
- physical features (unlawful in the State of Victoria only)
- profession, trade, occupation or calling (unlawful in the Australian Capital Territory only)
- industrial/trade union membership, non-membership or activity
- political belief or activity
- employer association membership, non-membership or activity
- compulsory retirement
- criminal record
- HIV/AIDS
- medical record
- spent convictions
- defence service
- association (that is, being associated with a person who has one or more of these attributes).

Attachment 2
Grievance Procedure

There are a number of options available to Cyprium and the complainant to manage a complaint, with varying degrees of formality. This Grievance Procedure sets out the steps that Cyprium requires to be followed when responding to any complaints brought under the Workplace Behaviour Policy.

Step 1:

Workplace participants may raise a complaint with any Grievance Officer, or through their direct line manager or manager once-removed.

Under the Grievance Procedure, complaints may be managed formally or informally, depending on (among other things) the nature of the complaint.

Step 2:

The Grievance Officer determines the appropriate option for handling the complaint. The manner in which a grievance will be handled is at the discretion of the Grievance Officer, taking into account the nature and circumstances of the complaint and such other matters as the Grievance Officer considers appropriate.

The Grievance Officer may consider the wishes of the person making the complaint when determining how to manage the complaint.

Step 3:

Option 1 – Counsel and advice

If a workplace participant feels comfortable doing so, they are encouraged to address the issue directly with the person concerned.

The role of the Grievance Officer is to provide support and advice to the complainant regarding the approach to addressing the issue directly, including ensuring that the complainant properly identifies the offending behaviour, explains that the behaviour is unwelcome or offensive (for example) and ask that the behaviour ceases.

It is important that the complainant is cognisant that the other party may not be aware that the relevant behaviour was unwelcome or caused offence.

Option 2 – Referral of the complaint

A complainant may wish to formally refer a complaint to:

- a Grievance Officer; or
- in the case of an employee complainant:
  - to the employee's manager; or
  - the employee's manager once-removed,

to be managed in accordance with the Workplace Behaviour Policy. In any case, the complaint will be investigated appropriately.[3]

The Grievance Officer is responsible for assessing the complaint and determining what action should be taken, including whether options 3 and 4 (below) are appropriate.

[3] Complaints under the Company's Whistleblower Policy may result in referral of the complaint to a Grievance Officer in any case.

Option 3 - Informal Complaint Procedure

Cyprium generally encourages informal resolution of grievances in the first instance, except where the nature of the allegations or the circumstances in which they are said to have occurred make it inappropriate to do so.

Informal options include, but are not limited to:

- the Grievance Officer or a senior representative of Cyprium (such as an Executive) discussing the issue with the person against whom the complaint is made; and/or
- the Grievance Officer facilitating a meeting between the parties in an attempt to resolve the issue and agree on a way to work together in future.

Cyprium may use the services of an external mediator in appropriate cases.

The informal complaint procedure is more suited to less serious allegations that, if substantiated, would not warrant disciplinary action being taken. It may also be more suitable where parties are likely to have ongoing contact with each other and need to maintain a working relationship.

Option 4 - Formal Complaint Procedure

The formal complaint procedure involves a formal investigation of the complaint. Formal investigations may be conducted by a Grievance Officer or a person from outside the Company appointed by Cyprium to investigate.

An investigation generally involves collecting information about the complaint and then making a finding based on the available information as to whether the alleged behaviour occurred.

Once a finding is made, the Grievance Officer or the external investigator will make recommendations about resolving the complaint.

If Cyprium considers it appropriate for the safe and efficient conduct of an investigation, workplace participants may be required to not report for work during the period of an investigation. Cyprium may also provide alternative duties or work during the investigation period. Generally, employees will be paid their normal pay during any such period.