



# OUR CODE OF CONDUCT



Revised and approved by the YAL Board on 19 December 2025

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## MESSAGE FROM THE CHAIRMAN OF THE EXECUTIVE COMMITTEE



At Yancoal our vision is to build a world class mining enterprise that provides resources that benefit modern society. We strive to be a business that: operates responsibly, safely and ethically; makes positive contributions to the social and economic well-being of communities in which we live and work; and effectively manages ongoing risks and opportunities to enhance the business.

We are committed to producing a reliable energy source that powers communities around the world. In supporting the world's energy transition and Yancoal's ongoing success, we are exploring opportunities to diversify.

We value the contributions of our employees, contractors and their families, and embrace close relationships with our local communities and suppliers. Our people are our priority, and we strive to provide our people with a safe, enjoyable and rewarding work environment. We have a holistic approach that addresses the interconnectedness of people, the environment and the economy in the areas where we operate.

Being a major player in the Australian mining industry comes with great responsibility. Yancoal aims to conduct business through the highest standards of professionalism and ethical conduct which is underpinned by our core corporate beliefs of compliance, efficiency and transparency. Guided by our approach, beliefs and values, we will continue to sustain the growth and success of the Company over the longer term.

Who we are and how we work as Yancoal employees is informed by the 'Yancoal Way', which encapsulates our beliefs, values and expected behaviours. Our Code of Conduct reflects the 'Yancoal Way' and outlines the expected standards of behaviour for all our people, whether you are a director, employee, contractor, agent, or representative engaged by Yancoal. Our Code of Conduct is non-negotiable – everyone working at or with Yancoal is expected to follow this minimum standard and to report observed behaviours that are not aligned with our requirements.

Yancoal's Code of Conduct has been written with our responsibilities in mind. I ask that you read this document carefully, refer to it regularly and seek clarification where in doubt or if required. Our Code of Conduct should guide your daily decisions, your actions and your treatment of everyone you encounter while working with us at Yancoal.

I look forward to your contribution to Yancoal and our ongoing success.

*Ning Yue*  
*Chairman of Executive Committee*

## EXPLAINING THE CODE OF CONDUCT

Yancoal Australia Ltd is committed to operating legally, honestly and to the highest level of integrity and ethical standards in all business practices. For the purposes of this Code, any reference to Yancoal or the 'Company' includes Yancoal Australia Ltd, its subsidiaries and each entity that it manages or operates.

The Yancoal Code of Conduct (the "Code") sets out the basic rules on how we work with each other, how we interact with others outside the Company and how we make decisions in the way we conduct our business. The Code should be read in conjunction with all other relevant Yancoal policies.

The Code applies to all business activities of Yancoal, in Australia and overseas. It includes dealings with directors, officers, employees, government officials, contractors, customers, suppliers, consultants, agents, advisors and representatives and is a common reference point for anyone who is unclear about what is expected of them in certain situations. Suppliers should also refer to the Yancoal Supplier Code of Conduct which sets out Yancoal's minimum requirements and expectations for our suppliers in all business dealings with Yancoal.

Adherence to the Code means we are not only complying with relevant legislation and regulations, but also ensuring our individual behaviour is aligned with the Yancoal Way and our core values regarding safety, people, excellence, integrity and innovation.

The details of the Code are presented in three sections:

- I. Ethics and professional standards;
- II. Information and communication; and
- III. Behaviour, people and culture.

Examples of conduct are given throughout the Code to illustrate certain principles and requirements. Those examples are not exhaustive. If you are in any doubt regarding whether conduct is permitted or not, you must speak with your manager or HR.



## WHO MUST FOLLOW THE CODE OF CONDUCT

The Code applies to all directors, officers, employees, contractors, agents, and representatives engaged by Yancoal (Personnel).

You can also use the Code as a guide if:

- you are uncomfortable with the behaviour of others;
- you are unsure whether or not behaviour is appropriate; and
- you need advice on whether to take further action.

You are expected to attend and participate in induction, awareness and training sessions on the Code. All of your Yancoal responsibilities and business activities must be conducted in accordance with the Code.

The Code will be periodically reviewed to check that it is operating effectively and will be updated should amendments be required.

*The Code does not and cannot describe every law, regulation, minimum performance requirement or scenario that you may face. Make sure you know the laws, Company charters, policies and procedures applicable to you, and comply with them. If you are ever in doubt about a particular situation and how the Code might apply, discuss this with your manager, a member of the Legal and Compliance Team, an HR Manager, the Company Secretary or a member of the Audit and Risk Team.*



# A QUICK CHECK

## WHEN IN DOUBT ASK YOURSELF:

- |   |  |               |
|---|--|---------------|
| ✓ | Is it legal? Am I authorised to do this?   | ? Seek Advice |
| ✓ | Am I behaving in line with Yancoal's values?   | ? Seek Advice |
| ✓ | Is it in line with Yancoal's health & safety standards?  | ? Seek Advice |
| ✓ | Does it fit with my personal values and would I be comfortable telling my family, friends or workmates about this? | ? Seek Advice |
| ✓ | Is it the right thing to do?   | ? Seek Advice |
| ✓ | Am I setting the right standard for my team mates?   | ? Seek Advice |
| ✓ | If the story appeared on the news, would I feel comfortable with my decisions?                                     | ? Seek Advice |

# OUR WAY

## THE YANCOAL WAY

The Code should be read in conjunction with the Yancoal Way and the Company's charters, policies and procedures. The Yancoal Way defines our vision, values, company culture and the behaviours expected of all Yancoal Personnel.

### TRANSPARENCY

We are open and honest with one another and have a "no surprises" mentality for all the stakeholders we work with.

### EFFICIENCY

We strive to be efficient, productive and effective at what we do all day, every day.

### COMPLIANCE

We always follow our internal rules and the rules of law where we operate.



# OUR CORE VALUES



## SAFETY

Safety is not optional. It is considered in everything we do to eliminate harm to our people.



## PEOPLE

We value involvement from everyone. Full engagement is encouraged. 99% of what we need to know is already within the Yancoal workforce.



## EXCELLENCE

We identify and implement best practice and operate above the line in the 'can do' zone with courage, trust and pride.



# OUR WAY

THE YANCOAL



## INNOVATION

We seek to continuously improve all aspects of our business.

## INTEGRITY

We do what we say with honesty, integrity and reliability.

If it feels like the wrong thing to do it quite possibly is. If you are uncomfortable with doing something, check the Code or seek advice.

# YOUR INDIVIDUAL RESPONSIBILITIES

## DO THE RIGHT THING

The Code is for you. It sets the boundaries within which you must operate every day, without exception. Read it. Understand it. Follow it.

## YOUR RESPONSIBILITIES

It is your responsibility to:

- comply with the Code and all other applicable Yancoal charters, policies and procedures;
- act at all times in the best interests of Yancoal, with strict integrity and according to legal and approved Yancoal business practices;
- conduct business honestly, ethically, responsibly, collaboratively and sustainably, with your best skills and judgment and for the benefit of shareholders, customers, colleagues and Yancoal alike;
- make sure that any third party contractors, agents or consultants you work with are aware that you are both bound by our Code and that they are expected to act accordingly;
- advocate standards, practices and processes which respect human rights and avoid complicity with human rights abuses;
- actively participate in creating a psychosocially safe and inclusive workplace;
- be aware of and comply with your duties and obligations under all laws and regulations relating to your work; and
- speak up and report any concerns, issues or suspected violations of our Code. If you do not feel comfortable raising such matters directly with others, report them in accordance with the Yancoal Whistleblower Policy.

## WHAT HAPPENS IF I VIOLATE THE CODE?

You will be held accountable for your work and behaviour at Yancoal. Violations of the Code, and relevant policies as indicated, can result in disciplinary action. Depending on the severity of the breach, appropriate disciplinary or corrective action will be determined in consultation with HR, the Legal and Compliance Team and in accordance with the Workplace Behaviour & Disciplinary Action Procedure. Disciplinary outcomes may include formal warnings, suspensions or termination of employment or contract. In some cases, Yancoal may report a violation to the relevant authorities, which could also lead to legal action, fines or imprisonment.



## KEY COMPONENTS OF THE CODE OF CONDUCT

### I. WE ACT PROFESSIONALLY AND ETHICALLY AT ALL TIMES

We must ensure that activities are conducted to the highest legal and ethical standards possible. Listed below are some of the things to consider in acting professionally and ethically at Yancoal:

#### **BRIBES, CORRUPTION, INDUCEMENTS AND COMMISSIONS**

Bribery is the offer, payment, provision, or promise of a benefit or advantage to someone with the intent to improperly influence or given in a manner that would tend to influence, the performance of that person's duty in order to obtain or retain business or an advantage.

There are many criminal laws, both in Australia and other countries, that apply to Yancoal. In all cases, bribery of government officials, either foreign or domestic, is a crime. Some laws that apply to Yancoal also make it a criminal offence to bribe private individuals. Yancoal prohibits all forms of bribes (for example, a bribe does not have to be a payment - It can be an advantage), regardless of the recipient, including to private individuals.

You must not offer, authorise or pay any bribes, facilitation payments, inducements, commissions or anything else of value to a Public Official (including without limitation, family members or associates of a Public Official), or any other parties to induce them to perform their work duties disloyally or to otherwise improperly gain an advantage for Yancoal.

You must not offer, promise, give or authorise a gift or benefit including any advantage to any public servant of Hong Kong in any circumstance.

These prohibitions extend to payments or any other advantage made, offered, promised, given or authorised in any form, either directly, or indirectly through agents, representatives, consultants or other intermediaries. There is no minimum value or threshold for an "advantage" to qualify as a bribe. It is not a defense to argue that such payment or advantage is a custom or tradition.

## GIFTS AND BENEFITS

You must not give, offer, promise, authorise, solicit, or accept, in connection with Yancoal activities, any gift, entertainment or other personal favour, benefit or assistance which goes beyond common courtesies associated with general commercial practice and which is above nominal value (as defined in the Gifts and Benefits Policy).

Yancoal requires pre-approval, approval and reporting of certain gifts and benefits to ensure that the offer or acceptance of these does not create an obligation and cannot be construed or used by others to allege favouritism, discrimination, collusion or similarly unacceptable practices by Yancoal.

Similarly, some gifts and benefits should not be offered or accepted at all. You must not, under any circumstances accept any gifts or benefits (including hospitality), if the party giving or offering the gift or benefit is, at the time of giving or offering the gift or benefit, participating in any tender or other competitive process related to the supply of goods or services to the Company. You must also not solicit gifts or benefits from competitors, suppliers, customers, trading parties or companies associated with any of them, or from other employees or intermediaries.

It is important that you familiarise yourself with Yancoal's Gifts and Benefits Policy before you offer, give, promise or accept any gifts or benefits. If you are in any doubt regarding Yancoal's Gifts and Benefits Policy, you must speak with your manager, HR, a member of the Legal and Compliance Team or a member of the Risk & Audit Team.

## CONFLICTS OF INTEREST

You must act at all times in the best interests of Yancoal. You must not use your position or any property or information of Yancoal for personal gain, or to inappropriately benefit any business or person or to cause detriment to Yancoal or its customers.

You must avoid entering into any situation in which an actual, potential or perceived conflict of interest may arise.

A conflict of interest exists where loyalties are divided. You may, for example, have a conflict of interest if, during your employment or engagement with Yancoal:

- any of your decisions lead to an improper gain or benefit to you or an associate; or
- your personal interests, the interest of an associate or relative, or your obligation to some other person or entity conflict with your obligation to Yancoal. This includes instances where this situation impacts your independence or the quality of your work. An example of this could include where you are in a relationship with a member of your team (if you are a line manager) or your line manager (if you are a team member).

You are responsible for formally notifying Yancoal in a timely manner of any actual, potential or perceived conflicts of interest. If you have reasonable grounds to believe that you have a conflict of interest, you must immediately disclose that interest and discuss the matter with your manager, local HR department, the Executive General Manager for Audit and Risk, a member of the Legal and Compliance Team, or other person notified to you by the Company. The outcome of the discussion must be documented and, where applicable, include mitigating actions and a defined and reasonable point in time to revisit these matters.

In addition, Directors and Company Officers are also bound by Yancoal's Conflict of Interest and Conflicts and Related Party Transactions Policies.

# OUR WAY

THE YANCOAL

## IS TO:

- Conduct all activities to the highest legal and ethical standards possible and in the best interest of Yancoal.
- Comply with Yancoal's Conflict of Interest Policy and formally declare any actual, potential or perceived conflicts of interest in the Conflict-of-Interest Register on the Company's intranet as soon as they arise.
- Excuse yourself from situations where a spouse, relative, family member, friend or person with whom they have a close personal or romantic relationship applies for work as a supplier or for a role within our company where you are in a position to influence the outcome.
- Comply with Yancoal's Anti-Corruption and Sanctions Policy and Gifts and Benefits Policy and maintain accurate books and records, including formally declaring Gifts and Benefits received in the Gifts and Benefits Register on the Company's intranet pursuant to the policy.

## IS NOT TO:

- Offer, give, promise, authorise, or pay anything of value to a public official with the intent to improperly influence the performance of a person's duty to obtain or retain business or an advantage.
- Offer, give, promise, authorise any advantage, or pay anything of value to a public servant in Hong Kong.
- Use facilitation payments to make things go quicker.
- Accept gifts, entertainment or other benefits that extend beyond common courtesies.
- Accept gifts, entertainment or any other benefit from a supplier during a competitive procurement process.
- Solicit Gifts and Benefits from competitors, suppliers, customers, trading parties or companies associated with any of them, or from other employees or intermediaries.
- Participate in any third-party business activities that deal with or are competitive to Yancoal.
- Use your position within Yancoal to gain insights or advantage for another business you or your family/ friends may be involved in.
- Make employment decisions that are influenced by personal relationships.

## KEY COMPONENTS OF THE CODE OF CONDUCT

### IMPROPER USE OR THEFT OF COMPANY PROPERTY, ASSETS AND EMAIL

You are responsible for protecting all Yancoal property and assets that are under your control, and you must safeguard them from loss, theft and unauthorised use.

Company property and assets include but are not limited to:

- cash and fuel-cards;
- plant and equipment, parts, power-tools, materials, supplies, fuel and securities;
- office equipment and supplies;
- mobile phones and computers;
- company vehicles;
- confidential, commercially sensitive and/or third-party information including business plans;
- intellectual property (including computer programs, software, models and other items or business files);  
and

You must not:

- use Company assets for any unlawful purpose or unauthorised personal benefit;
- remove Company property and documents from official premises without a good and proper reason. If required to be removed, they should be stored in a secure manner, covered by appropriate insurance and returned at the earliest possible occasion; or
- make improper disclosure (including disclosure that results from a failure to take reasonable precautions) or use of Yancoal confidential information, including competitive business strategies and plans, special methods of operation, tender or pricing information or other information that can be considered confidential, sensitive or of competitive value to Yancoal. If you are unsure whether information is of a sensitive or confidential nature, seek advice from your General Manager before disclosure.

As set out in Yancoal's ICT Acceptable Use Policy and Workplace Surveillance Procedure, the Yancoal IT department will monitor internet browsing, email activity and other forms of IT usage to ensure compliance with these policies.

## COMPANY REPUTATION

Employees must not act in any way that could cause harm to Yancoal'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. This includes any event connected to the workplace e.g. travelling for work purposes or at work-related functions.

## COMPETITION

Yancoal supports fostering competition in the markets in which it operates. You must comply at all times with anti-trust and competition laws. You must:

- Not engage in anti-competitive behaviour in the acquisition of goods and services or in the sale of our products. Examples include collusive behaviour and price or volume fixing, boycotts or otherwise act in concert with competitors.
- Not discuss, share or receive competitively sensitive information with competitors.
- Consult with the Legal and Compliance Team if you are concerned about any activity of an employee, contractor or third party that might involve competition laws or issues.

## APPLICABLE POLICIES

Yancoal maintains a variety of policies to help ensure ethics and professional standards are always maintained at Yancoal, including but not limited to:

- ICT Acceptable Use Policy;
- Anti-Corruption and Sanctions Policy;
- Community Support Program Policy
- Competition and Anti-Trust Policy;
- Conflict of Interest Policy;
- Delegation of Authority;
- Fraud Policy;
- Gifts and Benefits Policy;
- Share Trading Policy;
- Privacy Policy;
- Procurement Policy and Procure to Pay Procedure;
- Working Hours and Arrangements Policy;
- Workplace Behaviour Policy; and
- Workplace Surveillance Procedure.

*These policies and procedures can be found on Yancoal's intranet and are updated when applicable. You are expected to be familiar with and adhere to their requirements.*

# OUR WAY

THE  
YANCOAL

## IS TO:

- Protect Yancoal's property and assets including data / information, equipment power-tools / tools, materials and fuel.
- Follow Yancoal's procurement policies and procedures. This includes following the requirements as related to sole sourcing / contract management, and it extends to being diligent in your SAP endorsements and approvals.
- Comply with the Company's warehousing and goods receipting process; all goods must be delivered to the warehouse (or reception for corporate offices) along with appropriate delivery dockets.
- Be diligent with your SAP Service Entry Sheets (SES), you will be deemed accountable for validating the vendor's claim or invoice.
- Accurately record overtime, entitlements and annual leave.
- Remain alert to cyber security threats, including phishing and/or business email compromise attempts. If in doubt, seek advice. Consider the places we conduct and discuss our business to avoid information being inadvertently shared with third parties.
- Always act in a manner that is professional and protects your and Yancoal's reputation.
- Always do the right thing and comply with the company's charters, policies and procedures and confidentiality requirements / agreements.
- Speak up if you experience or witness something that is not aligned with our Code or our policies and procedures.



## IS NOT TO:

- Use Yancoal IT infrastructure inappropriately.
- Falsely claim working hours, overtime or other benefits to which you are not entitled.
- Inappropriately seek reimbursement of personal expenses or inappropriately use fleet cards. ‘
- Use the Yancoal procurement process for personal / non-business-related purchases.
- Circumvent the warehousing process, e.g. have goods delivered directly to you or your home.
- Inappropriately dispose of any Company assets / items for your or third-party gain.
- Inappropriately use or share confidential or commercially sensitive information.
- Copy, forward or otherwise take Yancoal’s intellectual property, information, emails or other business data without legitimate reason and/or for your personal use or gain.
- Share passwords or otherwise facilitate or allow unauthorised access to the Company’s systems, information and data.
- Plan, build or repair personal property within working hours or at Company cost.

## KEY COMPONENTS OF THE CODE OF CONDUCT

### II. WE RESPECT INFORMATION AND COMMUNICATE EFFECTIVELY WITH OUR STAKEHOLDERS

Our work requires the use and exchange of information. When dealing with information there are certain risks to be aware of, including in respect of personal information or data falling into the wrong hands. This section of the Code is designed to help you deal with risks associated with information and communication.

#### DATA PRIVACY

You must always respect the personal information and privacy of others. You should only collect, use, disclose, retain or process personal information in accordance with the law and Yancoal's Privacy Policy. All communications using Yancoal equipment, devices or infrastructure is the property of Yancoal. If your email or other electronic communication is personal, you should consider using a personal device if you wish for them to remain private.

#### PUBLIC COMMUNICATIONS AND DISCLOSURES

You are responsible for the integrity of the information, reports and records under your control and you are expected to exercise the highest standard of care in preparing materials for public communications. Those documents and materials should:

- comply with any applicable legal requirements;
- fairly and accurately reflect the transactions or occurrences to which they relate;
- not contain any false or intentionally misleading information, nor intentionally misclassify information; and
- be in reasonable detail and recorded in the proper account and in the proper accounting period.

Media statements and official announcements may only be made by persons authorised to do so.

If you receive a request for information and you are not authorised to respond to the enquiry, refer the request to the General Manager, Corporate Affairs.

Unless the General Manager, Corporate Affairs has given prior written consent, you must not participate in public forum discussions (including internet-based forums) where the subject matter is related to Yancoal, its competitors or the industry in which Yancoal operates.

## DISCLOSURES AND SHARE TRADING POLICIES

The objective of the Disclosure Policy is to keep the market fully informed of information that may have a material effect on the price or value of Yancoal's securities, and to correct any material mistake or misinformation in the market.

You must ensure that you are aware of the requirements of the Disclosure Policy and act in accordance with this policy.

You must only trade in Yancoal securities in accordance with the Share Trading Policy.

You must not buy, sell or otherwise deal in Yancoal securities if you are in possession of 'inside information' about Yancoal that is not generally available to the public. If you possess such inside information, you should not pass that information on to any other person or advise or encourage another person to trade in Yancoal securities. You must comply with the Yancoal Share Trading Policy.

## APPLICABLE POLICIES

Yancoal maintains a variety of policies to help ensure ethics and professional standards are always maintained at Yancoal, including but not limited to:

- ICT Acceptable Use Policy;
- Disclosure Policy;
- Privacy Policy; and
- Share Trading Policy;

*These policies can be found on Yancoal's intranet and are updated when applicable. You are expected to be familiar with and adhere to their requirements.*

# OUR WAY

THE YANCOAL



## **IS TO:**

- **Protect personal information.**
- **Refer any media enquiries to the General Manager, Corporate Affairs.**
- **Refer any investor relations enquiries to the General Manager, Investor Relations.**
- **Keep the market fully informed of information through the proper means.**
- **Only trade in Yancoal's securities in strict accordance with the Share Trading Policy.**
- **Speak up if you experience or witness something that is not aligned with our Code or our policies and procedures.**

## **IS NOT TO:**

- **Post Company related information on social media without authorisation.**
- **Share, distribute or post photographs, documents or audio recordings related to the Company's operations without authorisation.**
- **Respond to media enquiries without authorisation.**
- **Behave in a way that could cause damage to the employment relationship.**
- **Behave in a way that could damage Yancoal's interests.**
- **Behave in a way that is incompatible with an employee's duty of care to their employer.**

## KEY COMPONENTS OF THE CODE OF CONDUCT

### III. OUR PEOPLE, BEHAVIOURS AND CULTURE SUPPORT THE CODE OF CONDUCT

Yancoal wants to ensure everyone works in an environment that is conducive to productivity, safety and teamwork. This section of the Code outlines the standards of good behaviour that are expected from you and that you can expect from others.

#### ACCEPTABLE WORKPLACE BEHAVIOUR, EQUAL OPPORTUNITY AND ANTI-DISCRIMINATION

Yancoal is committed to:

- Fair employment practices, anti-discrimination and equal employment opportunity;
- creating a positive, inclusive and diverse work environment where all individuals are respectfully accepted and that is free from any kind of discrimination, harassment, sexism, sexual harassment, bullying or intimidation; and
- respecting human rights.

You are expected to conduct yourself in an appropriate manner and demonstrate respect for others at all times. You must not harass, sexually harass, bully, victimise or unlawfully discriminate against another.

Yancoal's Workplace Behaviour Policy and Modern Slavery Policy can be found on Yancoal's intranet. You are expected to be familiar with and adhere to these policies.

Yancoal will endeavour to promptly investigate all allegations of harassment, sexual harassment, bullying, victimisation, discrimination and human rights abuses and will take appropriate corrective action. Retaliation against individuals for raising such concerns will not be tolerated.

#### MANAGING SUSTAINABLY

For Yancoal, sustainability involves the generation of lasting value for stakeholders through our mining activities, all while minimising financial, operational, environmental and social risks.

Our commitment to sustainability is outlined in the Yancoal P4 Change 4 Tomorrow Strategy, which revolves around four interconnected pillars and has been intentionally crafted to be comprehensive, adaptable and integrated across all of Yancoal's business activities.

#### HEALTH AND SAFETY

Yancoal is committed to maintaining a healthy and safe working environment for its employees as far as is reasonably practicable. You must fully comply with all appropriate laws and internal regulations (including workplace health and safety laws).

Misusing controlled substances or alcohol, or selling, manufacturing, distributing, possessing, using or being under the influence of illegal drugs on the job or in the workplace will not be tolerated.

You are required to familiarise yourself with, and strictly adhere to, Yancoals Health and Safety Policy and all relevant procedures to ensure the workplace is safe and without risk to the health of others and yourself. You should follow any lawful and reasonable instructions consistent with that policy and those procedures. You may have further workplace health and safety policies to comply with at your particular workplace.

## CONTRIBUTION TO THE COMMUNITY

Yancoal is a responsible corporate citizen and actively supports the communities in which we live and work. You are expected to uphold Yancoals commitment to pursue good corporate citizenship while engaging in work activities. Yancoal supports and encourages you to actively contribute to the needs of the community. If you wish to make such a contribution (such as donations or sponsorship) on behalf of Yancoal, consult the Head of HR Corporate for approval.

Modern Slavery in all forms is strictly prohibited. Yancoal is committed to respecting human rights, and to acting ethically and with integrity in all its business dealings and relationships to ensure Modern Slavery does not take place anywhere in its business, operations and its supply chains.

## ENVIRONMENT

Yancoal is committed to doing business in an environmentally responsible manner and identifying environmental and cultural heritage risks that may arise out of its operations. You must abide by all applicable local laws and regulations and are expected to respect and care for the environments in which Yancoal operates. If you are aware of, or suspect, an action that is not environmentally responsible and/or in breach of the applicable laws and regulations, report the matter immediately to your supervisor, manager, local HR department, or a member of the Legal or Compliance Team.

## POLITICS

You may voluntarily participate in the political process as an individual. We ask that you do so in your personal capacity only (unless authorised otherwise) and do not engage in actions that could cause someone to believe that your actions reflect the views or position of Yancoal.

It is against Company policy to use corporate funds for political purposes. This Code does not prohibit:

- political activity by any employee in his or her individual or private capacity. However, to eliminate any appearance of coercion in such political activities, it is against Company policy for any supervisor to solicit funds from a subordinate for political purposes;
- payments of salaries and expenses of employees whose duties may include communication with government officials; and
- communications by Yancoal to its shareholders on any lawful subject.

## APPLICABLE POLICIES

Yancoal maintains a variety of policies to help ensure ethics and professional standards are always maintained at Yancoal, including but not limited to:

- Anti-Corruption and Sanctions Policy;
- Health and Safety Policy;
- Modern Slavery Policy;
- Diversity and Inclusion Policy;
- Preventing and responding to Sex Discrimination and Sexual Harassment Procedure;
- Workplace Behaviour Policy; and
- Workplace Surveillance.

*These policies and procedures can be found on Yancoals intranet and are updated when applicable. You are expected to be familiar with and adhere to their requirements.*

# OUR WAY

THE YANCOAL

## IS TO:

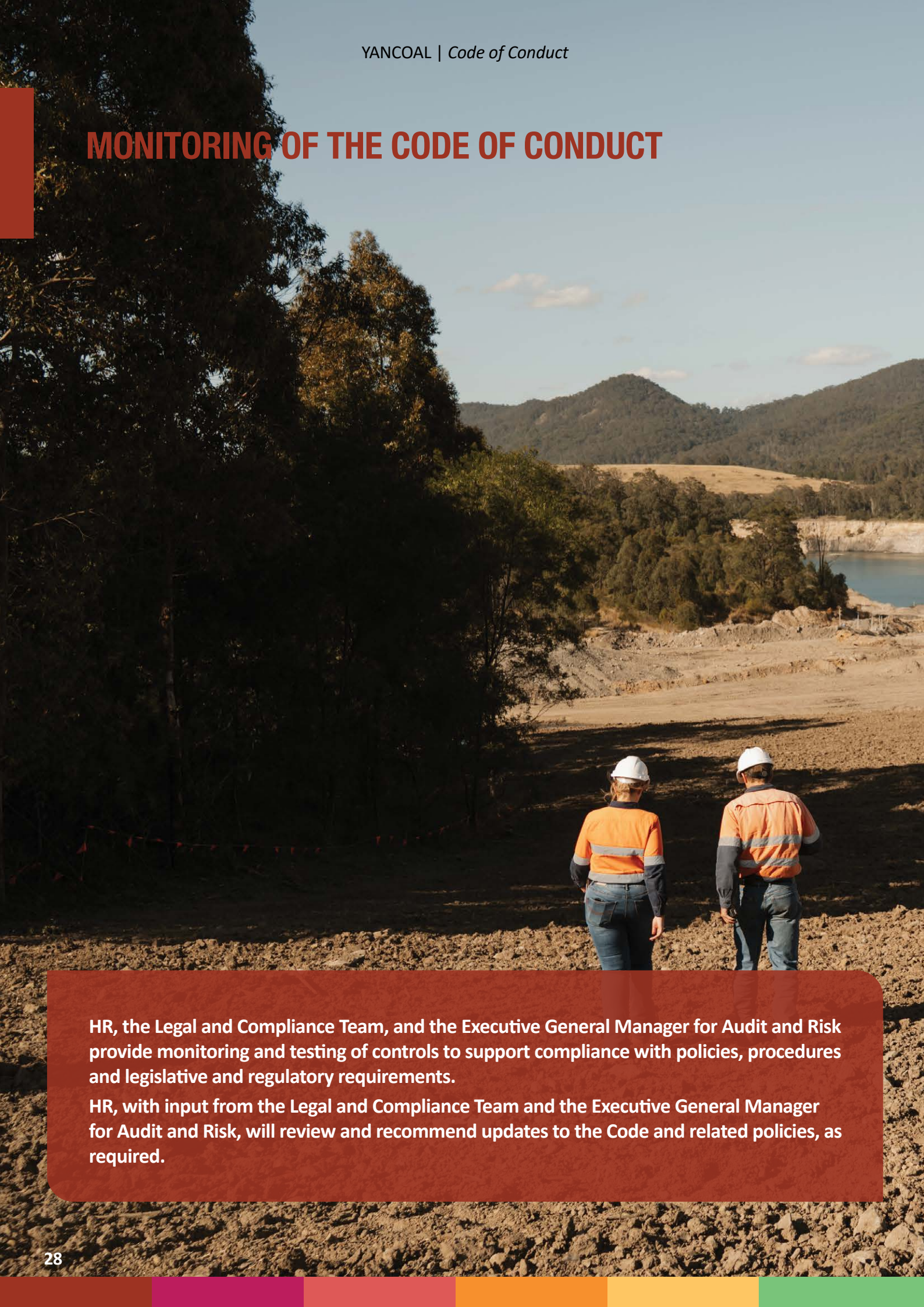
- Consistently and timely log into sites using Yancoal's Pegasus Portal.
- Strictly abide by Yancoal's health and safety requirements, immediately stop work if it would be unsafe to continue and report incidents and concerns in a timely and transparent manner.
- Immediately report where a person is suspected to be under the influence of alcohol or illicit drugs at our sites.
- Treat everyone with respect and value the diversity within the organisation.
- Show respect to issues of environmental or cultural heritage significance.
- Share information with our colleagues as appropriate and required for the job (while respecting potentially applicable confidentiality requirements).
- Behave like a good corporate citizen in everything we do.
- Speak up if you experience or witness harassment, bullying or victimisation.



## IS NOT TO:

- Drive production at all costs regardless of impact on safety, communities or the environment.
- Work while fatigued, under the influence of alcohol or drugs or otherwise unfit for work.
- Harass, sexually harass, bully, threaten or physically attack others.
- Discriminate against anyone because of their race, gender, age or sexual orientation.
- Make comments or jokes of sexual nature or unwelcome advances.
- Be dismissive, belittling, rude or aggressive in your dealing with others.
- Use rude or otherwise inappropriate language.
- Spread rumors about others.
- Make employment decisions that are influenced by personal relationships.
- Use suppliers who participate in human rights abuse, breach laws or regulations or have a poor safety track record.

## MONITORING OF THE CODE OF CONDUCT



HR, the Legal and Compliance Team, and the Executive General Manager for Audit and Risk provide monitoring and testing of controls to support compliance with policies, procedures and legislative and regulatory requirements.

HR, with input from the Legal and Compliance Team and the Executive General Manager for Audit and Risk, will review and recommend updates to the Code and related policies, as required.

## HOW TO SPEAK UP

By reporting misconduct or non-compliance with the Code you can help ensure:

- our people enjoy their work and are safe and secure in our workplace;
- the impact on communities and the environment is minimised; and
- we maintain and protect our good reputation.

You must report to your manager any behaviour or situation which you believe breaches or potentially breaches the Code, other Yancoal policies or the law as soon as practicable after becoming aware of potential breach.

Alternatively, you can report unacceptable behaviour through any of the following channels:

- your supervisor;
- a human resources manager;
- a member of the Legal or Compliance Teams; or
- the Company Secretary.

If you do not feel comfortable making a report to these colleagues, you can make an anonymous report using the third party Speak Up service:

- online at the confidential Speak Up web site - [www.yancoal.deloittedigital.com](http://www.yancoal.deloittedigital.com);
- via email to the confidential address [yancoal@deloittedigital.com](mailto:yancoal@deloittedigital.com);
- via telephone to the confidential Speak Up Line: 1800 721 989; or
- via mail to Yancoal, Reply Paid 12628, A'Beckett Street, Victoria 8006

Where you report your concerns anonymously, please make sure to regularly check the system for further communication, including additional information request.

## WHISTLEBLOWER PROTECTION

Yancoal is committed to ensuring that you are not disadvantaged or discriminated against for making a report under our Whistleblower Policy.

Yancoal does not tolerate retaliation, payback or detriment where a genuine concern has been reported in good faith. Retaliation is grounds for disciplinary action, including dismissal. If you have been retaliated against for a raising concern, you should report it immediately to your supervisor, a human resources manager, or a member of the Legal or Compliance Teams.

Yancoal's whistle-blower protection is provided via the Yancoal Speak Up Facility as above.

## INTERACTION WITH OTHER POLICIES

The Code should be read in conjunction with all other Yancoal policies, including but not limited to the following:

**ICT Acceptable Use Policy** - The objectives of the ICT Acceptable Use Policy are to:

- Protect employees from contact with material that is considered to be offensive or objectionable;
- Protect Yancoal IT assets from intentional or accidental damage and theft;
- Ensure that network storage is free of non-business and illegal data and information;
- Ensure that the reputation of Yancoal is not damaged by improper use of IT assets;
- Ensure that confidential information will only be available to authorised persons or organisations;
- Ensure that the availability and capacity of IT hardware and infrastructure shall not be diminished by improper use of IT assets and that Yancoal will not be exposed to external digital threats such as viruses, worms and trojans; and
- Ensure that all employees understand what is acceptable and unacceptable behaviour when using IT assets.

**Anti-Corruption and Sanctions Policy** - The Anti-Corruption Policy outlines the Company's commitment to the highest level of integrity and ethical standards in all business practices.

**Conflict of Interest Policy** - This Policy sets out the Company's expectations regarding the formal declaration of any perceived, potential or actual conflicts of interest.

**Conflicts and Related Party Transactions Policy** - The Conflicts and Related Party Transactions Policy details the Company's approach to managing conflicts of interests and related party transactions.

**Competition and Anti-Trust Policy** - The objective of the Competition and Anti-Trust Policy is to ensure that Yancoal and its personnel do not engage in anti-competitive conduct are in compliance with laws and regulations relating to anti-competitive behaviour.

**Disclosure Policy** - The Disclosure Policy details the Company's commitment to ensuring that the market is kept fully informed of information which may have a material effect on the price or value of Yancoal's securities.

**Diversity and Inclusion Policy** - The Diversity and Inclusion Policy details the Company's commitment to maintaining and promoting workplace diversity, in recognition that an engaged and diverse workforce will contribute to improved operating performance and business growth.

**Fraud Policy** - The Fraud Policy details the Company's risk management approach to preventing, detecting and responding to fraud within the company's purview. It sets out that Yancoal has zero tolerance for fraud, takes related exposures seriously, will work to recover losses and may refer fraud matters to regulators and/or law-enforcement agencies.

**Gifts and Benefits Policy** - The Gifts and Benefits Policy outlines expected behaviour in relation to gifts and benefits that may be offered, declined, given or received, meeting legal requirements, ethical standards, and community expectations.

**Health and Safety Policy** - This Policy sets out Yancoal's policy with respect to health and safety in the workplace. Yancoal is committed to zero harm to all people involved in Yancoal activities. We will provide a safe and healthy work environment.

**Modern Slavery Policy** – The Modern Slavery Policy describes Yancoal’s commitment to respecting human rights, and to acting ethically and with integrity in all its business dealings and relationships in ensuring Modern Slavery does not take place anywhere in its business, operations and its supply chains. Modern Slavery in all forms is strictly prohibited by Yancoal.

**Privacy Policy** - Yancoal values the privacy of individuals we interact with, from our customers and employees to our external business contacts. This policy ensures compliance with our obligations and gives clear direction on how we deal with personal information.

**Preventing and Responding to Sex Discrimination and Sexual Harassment Procedure** – At Yancoal, everyone has the right to feel safe and respected at work. Yancoal has a positive duty to take reasonable and proportionate measures to eliminate, as far as possible:

- conduct amounting to sex discrimination;
- sexual harassment;
- sex-based harassment (also known as harassment on the ground of sex);
- conduct that creates a hostile workplace environment on the ground of sex; and
- victimization.

The positive duty aims to create systemic change by preventing unlawful conduct from happening in the first place, rather than reacting to conduct after it has occurred and already caused harm. This is because preventative action that addresses relevant unlawful conduct at a systemic level is more effective at creating safe, respectful and inclusive workplaces.

**Procurement Policies and Procedures** - These documents set out Yancoal’s company-wide procurement standards, including (but not limited to) sole-sourcing, contract management as well as the receipting of goods and validation of service entry sheets.

**Share Trading Policy** - The Share Trading Policy establishes a best practice procedure for ensuring that relevant directors, employees and contractors do not buy, sell or otherwise deal in securities during times when the Company is likely to hold ‘inside information’ that could materially affect the price or value of securities. The Share Trading Policy also prohibits relevant directors, employees and contractors from dealing in securities when they are in possession of certain information as prescribed under the Corporations Act 2001 (Cth) and the Securities and Futures Ordinance (Cap. 571, The Laws of Hong Kong).

**Yancoal Whistleblower Policy (Speak Up Policy)** - The Speak Up Policy is intended to encourage employees and others to raise concerns regarding misconduct or an improper state of affairs or circumstances within the Yancoal Group. It is designed to complement normal communication channels between employees and their direct managers by providing an avenue for raising, and protection to those who raise, matters concerning misconduct or impropriety at Yancoal.

**Workplace Behaviour Policy** - The Workplace Behaviour Policy explains the standard of behaviour expected of employees in the workplace and defines how to resolve complaints about inappropriate workplace behaviour.

*These policies and procedures can be found on Yancoal’s intranet and are updated when applicable. You are expected to be familiar with and adhere to their requirements.*



[www.yancoal.com.au](http://www.yancoal.com.au)

