

Code of Conduct and Ethics Policy

1. Purpose

Mint Renewables Limited and its subsidiaries ('Mint') requires the highest standards of honesty and integrity from its directors, officers and employees. This commitment is reflected in this Code of Conduct and Ethics Policy ("Code"). The Code sets out the ethical and behavioural standards as well as the professional conduct with which we are expected to conduct our work life. It recognises the importance of Mint's reputation and the responsibility of each of us to uphold Mint's obligations to all of our stakeholders.

Mint also strives to create an inspirational and happy working environment. Mint expects employees to be trustworthy, respectful, responsible, fair, caring and good citizens. Mint seeks to embrace diversity in all its forms, as a value that enhances the business, and attempts to follow the environmental principles that underpin our business.

2. Compliance with All Laws, Regulations and Rules

We will, at all times, act honestly and in good faith, and comply with all applicable laws, including legislation, regulations, local authority decrees, local rules and customs in the countries in which Mint operates.

3. Prevention of Financial Crime

Mint has no tolerance for fraud, money laundering, terrorist financing, bribery or corruption.

Fraud is an abuse of position, providing false information or compromising someone's rights for personal gain. Money laundering is any arrangement which facilitates the acquisition, retention, use or control of criminal property. Terrorist financing is a financial crime where a person provides or collects funds with the intention to carry out terrorist acts.

We will not do anything to facilitate these financial crimes.

For more details, please refer to "Prevention of Financial Crime" Policy.

4. Gifts and Entertainment

We will not accept or offer any bribe, gratuity or other inducements in the course of our business dealings on behalf of Mint. Note that gifts of Mint-branded collateral (caps, bags keyrings etc) is an exception to this general rule.

We will not accept gifts or personal benefits of any value from internal or external parties if this could compromise or influence any decision by Mint (or be perceived to do so), taking into account the perception of key stakeholders. "Gifts" and "personal benefits" can include, for example, accommodation, goods, services, discounts, hospitality (e.g. sports events) and special terms on loans. Cash or cash equivalents should never be accepted.

As a general rule, accepting hospitality during a competitive tender process is strongly discouraged as it may compromise the perceived independence of the process. Similarly, political contributions could be construed as seeking to influence permitting or planning processes and will not be made, ensuring any conflicts, perceived or otherwise, are avoided.

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In line with the “Gifts and Entertainment Policy”, any gifts or entertainment over A\$100 which are accepted must be disclosed for recording. If offered a gift or hospitality that we are uncomfortable with, we will raise this promptly with our manager.

Similarly, all gifts over A\$300 must be pre-approved by Head of Australia.

All political and charitable contributions made on behalf of Mint should be pre-approved by the Head of Australia and all payments properly recorded.

For more details, please refer to “Prevention of Financial Crime” Policy.

5. Conflicts of Interest

We all have an obligation to ensure that our individual interests do not interfere or appear to interfere with Mint’s interests.

We will not have any undisclosed and unapproved business relationships, including with suppliers, customers, shareholders, investee companies or competitors that may impair, or could be perceived to impair, the independence of any judgement that we may make on behalf of Mint. We will not, without Mint’s prior written consent, engage in any other business or commercial activities which may conflict with our ability to perform our duties to Mint, or support a political party or organisation other than in a personal capacity.

For more details, please refer to “Conflict of Interests” policy.

6. Fair Dealing

We will deal honestly and fairly in all our dealings with Mint’s clients, professional advisors, and other stakeholders. We will treat all colleagues with respect and dignity.

7. Bullying, Discrimination and Harassment

Mint feels strongly that everyone has the right to be treated fairly in the workplace – no exceptions. We are committed to providing a work environment that is safe and free from any form of bullying, discrimination and/or harassment and will take all reasonable steps to ensure this. We are each responsible for ensuring we work in a positive and healthy work environment.

Mint will take all reasonable steps to ensure that bullying or harassment is dealt with as quickly as possible and that every employee feels that he/ she can continue to work in a safe and positive environment.

For more details, please refer to “Diversity, Equity & Inclusion” and “Bullying and Harassment” policy.

8. Use of Mint Assets and Property

We will use our best endeavours to protect Mint’s assets and property from loss, damage, misuse, waste and theft. We may use Mint’s equipment for reasonable personal use, provided that sufficient discretion is used. This use is a privilege, not a right, and may be withdrawn where use is inappropriate or excessive. Otherwise, we will only use Mint’s assets and property in our control and care for the legitimate and lawful business purposes of Mint and will not use that property for any other purpose, including for personal gain.

9. Confidentiality and Use of Mint Information

We will use Mint corporate information gained during our relationship with Mint only in the best interests of Mint and not for personal gain.

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Mint has adopted the Information Security Policy, which covers the requirement for confidentiality of sensitive information, integrity of data storage and availability of important information. We will comply with this policy and regularly refresh our knowledge of the relevant standards.

For more details, please refer to "Information Security" policy.

10. Social Media

Mint recognises that social media (including LinkedIn) is a tool of corporate and business engagement and that we may also use social media in a personal capacity. If we make any reference to Mint when using social media, we must comply with this Code. In particular, we will not post any photos on social media related to Mint business or social events without the prior written approval of the Head of Australia or a member of the management team.

This Code applies whether the use of social media is for work purposes or is outside of work, and regardless of whether Mint equipment is being used.

11. Compliance with Corporate Policies

We will, at all times, behave and conduct ourselves in a manner that is consistent with the values set out in this Code and will comply with all corporate policies adopted by Mint from time to time.

12. Escalation Procedures and Whistle Blowing

If we become aware of a legal, regulatory, policy or any other compliance issue, we have a responsibility to report it using Mint's breach reporting procedures and whistle blowing procedures.

For more details, please refer to "Whistleblowing" policy.

13. Compliance with this Policy

We are each required to attest annually that we have complied with this Code.

Failure to follow the standards provided in this Code will result in the appropriate staff or other performance management practices being invoked, and may lead to disciplinary action, including dismissal.

Signed



Peter Cowling
Head of Australia
Date: 17 April 2023

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