



PRIMERO

CODE OF CONDUCT POLICY

PURPOSE

Primero is committed to operating with a high level of ethical business standards and integrity. The Code of Conduct reflects our values and sets out the key principles and expectations for how we must behave in our day-to-day activities. At Primero, we all commit to the Code of Conduct – regardless of where we are or what we do. Please refer to the Code of Conduct Procedure (PRIM-HR-PRO-0011) for further information.

OUR VALUES

- Efficiency – Working Smarter.
- Accountability – Taking Ownership.
- Integrity – Upholding Promises.

WE EXPECT OUR PEOPLE TO

- Act in accordance with the Primero's values and the best interests of the Company.
- Comply with all laws and regulations that apply to the Company and its operations to avoid any illegal or unethical activity.
- Act ethically and responsibly.
- Avoid conflicts between the Company's interests and personal interests.
- Treat fellow staff members with respect and not engage in bullying, harassment, discrimination, or other forms of detrimental conduct.
- Report breaches of the Code of Conduct and speak up to hold others accountable.
- Foster an environment where rational, open, honest, and frank (and where appropriate, robust) debate is encouraged, with a view to achieving the best outcome for Primero.
- Protect the property and assets of the Company such that they are safeguarded from loss, theft, and unauthorised use.
- Maintain strong working relationships with suppliers and business partners allowing Primero to conduct business fairly, efficiently and in a manner consistent with achieving our vision.

COMMITMENT TO OUR CLIENTS

The Code of Conduct applies to all Primero personnel and contractors working across all projects and operations. The Primero Executive Leadership Team commits to ensuring the Code of Conduct Procedure is enforced and communicated to the workforce.

Michael Gollschewski

Chief Executive Officer and Managing Director