Code of Conduct

Approved 29 October 2009; revised 29 September 2022

1. Introduction

Techniche Limited (**the Company** or **Techniche**) and its subsidiaries (collectively **the Group**) is committed to not only complying with the law in each country in which it operates but also conducting business in accordance with the highest standards of ethical conduct in accordance with the core principles encapsulated in this Code of Conduct (**Code**).

This Code has been adopted to provide a clear guideline of the ethical behavioural standards expected of the Group's directors and employees.

2. Objectives

The purpose of this Code is to set the ethical standards for the Group's directors and employees all of whom are expected to pursue the highest standards of ethical conduct in the interests of shareholders, customers, suppliers and the general public.

Directors and employees also have an obligation under this Code to advise the Company of any illegal or unethical practices of which they become aware. Directors and Management will monitor compliance and will act on any actions which are inconsistent with this Code.

Any breaches of this Code should be reported to the Managing Director (employees) or the Chairman of the Board (directors).

3. Principles

The following principles will guide the conduct of the Group's directors and employees:

Good Corporate Citizenship

The Group is committed to demonstrate responsible leadership towards shareholders, customers, suppliers, employees and the communities within which it operates by:

- treating any complaint with sensitivity and taking appropriate action;
- observing the letter and the spirit of all relevant laws; and
- implementing appropriate Health and Safety policies, practices and procedures with the objective of zero injury to its employees.

Fairness, Honesty and Integrity

The Group is committed to conducting business with fairness, honesty and integrity. Its personnel are expected to:

- deal fairly and honestly with customers and suppliers – treating everyone with courtesy and respect
- treat all employees equally and fairly, without discrimination on the basis of gender, age, race, religion, sexual orientation or marital status;
- understand and comply with the legal requirements of the Group's policies;
- avoid actual or potential conflicts of interest and declare any actual or potential conflicts of interest that may arise;

- never give or receive bribes or kickbacks or similar inducements;
- decline gifts or other benefits that will compromise their independence;
- only trade in the Company's shares in the approved "trading windows" and in accordance with the Company's Securities Trading Policy;
- maintain the confidentiality of business information that they have access to in their work;
- respect the privacy of individuals and the privacy laws in relation to the collection, use and handling of other people's personal information;
- use the Group's information and communication tools in an effective, ethical and lawful manner; and
- protect the Group's property and the belongings of others from theft, misappropriation and misuse.

Employment Practices

The Group is committed to providing a safe and productive workplace. This includes a commitment to the principle of fair and equal opportunity in employment.

The Group will endeavour to:

- provide and promote equal access to employment;
- ensure personal development, training, and promotion is based on merit and the development of workplace competencies;
- eliminate all workplace harassment and discrimination,
- ensure the principles of equal opportunity through grievance procedures are maintained, and
- ensure a committed approach by management in dealing with equal opportunity, harassment and discrimination in a sympathetic, confidential and effective manner.

Trading in Shares

All of the Group's directors and employees are expected to comply with the Australian laws governing transactions in Techniche securities. The Board has adopted a Securities Trading Policy which regulates dealings in Techniche securities and securities of any other entity that may be affected by insider information.

The Group's directors and employees are prohibited from:

- using non-public or privileged Group information for personal advantage; and
- disclosing this information to any other person before the information is available to the general public.

Directors and senior executives (including in certain circumstances associates of Directors and senior executives) may not trade in Techniche securities if they have access to potentially price sensitive information not yet disclosed on the Company's website or during the period beginning one month before, and ending three Business Days after, the day on which::

- the Company lodges its half-yearly results with ASIC and posts a copy on its website;
- the Company lodges its full year results with ASIC and posts a copy on its website; and
- the Company holds its annual general meeting (assuming an update of the full year's results is given at the meeting).

Whistle blowing

The Group does not tolerate known or suspected incidents of fraud, corrupt conduct, adverse behaviour, legal or regulatory non-compliance, or questionable accounting and auditing matters by its employees. Nor does the Group tolerate taking reprisals against those who come forward to disclose such conduct.

The Group has adopted a Whistleblower Policy which is available for viewing on the Company's website in the "Governance" section.

4. Disclosure

The Board will make appropriate disclosure to shareholders in the Company's Annual Report of the key aspects of this Code of Conduct.

This code was adopted by the Techniche Limited Board on 29 October 2009 and revised on 29 September 2022.

The code is also publicly available on the Company's website in a clearly marked Corporate Governance section.

Any questions relating the interpretation of this code should be forwarded to the Company Secretary.