

Code of Conduct policy

1. Purpose

The purpose of the policy is to provide Denison Personnel¹ with the standards of behaviour required to ensure that we are seen as an organisation with a reputation of respect and integrity.

2. Introduction

The Denison Code of Conduct aims to:

- provide clear guidance on the company's values and expectations while acting as a representative of Denison.
- promote a common minimum standard of ethical behaviour, standards and expectations across the group, all business units and locations.
- offer guidance for shareholders, customers, readers, suppliers and the wider community on our values, standards and expectations, and what it means to work for Denison.
- raise employee awareness of acceptable and unacceptable behaviour and provide a means to assist in avoiding any real or perceived misconduct.

We are likely to be faced with situations that are not specifically addressed in this code. When dealing with these, we can ask ourselves the following questions to assist us in determining an appropriate course of action:

- Would I be proud of what I have done?
- Is it legal?
- Is it consistent with Denison's values, principles and policies?
- Do I think it's the right thing to do?
- What will the consequences be for my colleagues, Denison, other parties, and me?
- Are my actions transparent? Is there anyone else who I should make aware of my actions?
- What would be the reaction of my family and friends if they were to find out?
- What would be the impact if rumours started with our stakeholders or employees that Denison was engaged in this practice?
- Do my actions put anyone's health and safety at risk?

The Code of Conduct, detailed in the following pages, is written as a set of general principles in employment and should be read in conjunction with our other policies

3. Business Integrity

¹ Refers to anyone who is employed by or works at Denison, including employees (whether permanent, fixed-term or temporary), contractors, consultants, secondees and directors wherever located.

3.1 Honesty, Integrity & Fairness

We endeavour to perform our duties and conduct business in a manner that is honest and of the highest integrity. We strive to maintain our business relationships in a manner which are consistent with principles of respect for others and fairness. We aim to maintain standards that exceed community expectations.

Refer to:

- the Anti-Bribery and Anti-Corruption Policy
- the Anti-Slavery Policy
- the Corporate Social Responsibility Policy

3.2 Reporting Concerns

Denison is committed to fostering an environment where concerns can be reported without fear of punishment. We will treat all reports seriously and will act appropriately and promptly.

Refer to:

- the Whistleblower Protection Policy

3.3 Public Comment

As employees, we will not disclose publicly any information about the company, or make public comment on behalf of Denison, or using Denison facilities or equipment, unless required as part of our normal work or as specifically approved by the Managing Director.

If the media contacts us we will refer this to your Senior Team Leader.

Refer to:

- the Communication and Media Policy
- the Social Media Policy
- the Acceptable Use Policy

3.4 Conflict of interest

We will disclose any real or potential conflicts of interest when dealing with family, friends, or other related parties or entities on behalf of the company. We will make our interests known and seek approval before contracting with any of these parties.

Refer to:

- the Anti-Bribery and Anti-Corruption Policy
- the Procurement Policy

3.5 Compliance with and respect for the law

Denison and its employees respect the law and act accordingly by observing and respecting the relevant laws, customs and business methods in the environment in which the Company operates.

4. Professional Practice

4.1 Financial Interests

Denison employees should avoid taking a specific financial interest, or participating in financial activities and arrangements, that could conflict with their obligations of fairness and integrity to the company or its stakeholders, or that could be perceived to.

Refer to:

- ➔ the Anti-Bribery and Anti-Corruption Policy
- ➔ the Procurement Policy
- ➔ the Anti-Money Laundering and Counter-Terrorism Financing Policy (AML CTF Policy)

4.2 Property & Ownership

We take responsibility for the protection and care of our company assets including:

- Cash, corporate cards and vouchers; refer to the Corporate Credit Card Procedure
- Plant and equipment e.g.: cars or machinery;
- Company information; refer to the Data Privacy Policy, Acceptable Use Policy and various IT policies.
- Denison products and publications;
- Computers and software; refer to the various IT policies
- Intellectual property (e.g. copyright, trademarks, patents, registered designs and the right for the company to have its confidential information kept confidential).

We ensure that our actions in relation to company property are honest at all times. If we believe that theft or damage is taking place in the workplace, we will report it immediately to our manager.

To avoid any misunderstanding of our behaviour we should remember to always:

- Seek permission from a senior manager to take company property from the workplace and ensure its removal is documented and authorised.
- Always use company property for what it was intended and not for personal use unless authorised.
- Never assume that damaged stock or goods is not wanted or not valuable to the company.
- Return all assets when leaving the organisation.

4.3 Privacy & Confidentiality

We understand that as Denison employees we are placed in a position of trust and are regularly privy to sensitive information. We strive to operate in accordance with the relevant privacy legislation.

We undertake to handle such information in a confidential and sensitive manner and not use this information for personal gain or to share this information either during or after our employment with Denison unless required as part of our normal work.

We will under no circumstances discuss or disclose any confidential Company information. This information includes marketing or strategic plans, pricing, policy, costs and stories. If we are unsure of whether or not a particular piece of information is confidential, we will check with the source.

The Company's records include personal information. Personal information is information or an opinion about an individual whose identity is apparent or can be ascertained from the information or opinion. During the course of its activities, the Company may collect, hold or use personal information about suppliers of goods and services, customers, contractors and prospective and current Denison employees.

We will manage any such personal information in a professional and ethical manner and will not use it for any other purpose or disclosed it outside the Company without the permission of the individual concerned, unless authorised by law.

Refer to:

- the Data Privacy Policy and the Confidentiality Policy.

4.4 Other Employment

If we wish to work another job whilst with Denison we agree to obtaining written permission from our manager before undertaking such work and any such work must not represent an actual, potential or perceived threat of conflict of interest.

4.5 Personal Advantage

As Denison employees, we will not abuse any benefit or advantage that is not afforded to the public or part of any company sanctioned benefit. Such advantages include discounts, priority bookings, access to venues, retail or wholesale sales, restaurant bookings, real estate queues and upgrading of goods and services.

Refer to:

- the Procurement Policy

4.6 Gifts & Inducements

We will not accept gifts or inducements, which could impair our judgement or be perceived to be a conflict of interest, bribe or inappropriate gift.

Similarly, we will not offer bribes or inappropriate payments for the purpose of acquiring, retaining, directing business or receiving any kind of special or favoured treatment for the company.

Refer to:

- the Anti-Bribery and Anti-Corruption Policy
- the Anti-Bribery and Anti-Corruption Procedure
- the Gifts Register

4.7 Recruitment & Selection

Our commitment to attracting the best talent is reflected in our rigorous recruitment and selection process, which are based on merit. Our recruitment policies and procedures reflect this commitment.

Refer to:

- ➔ the Equal Employment Opportunity Policy
- ➔ the Diversity and Inclusion Policy

4.8 Company Reporting

We are committed to producing complete, balanced, timely, accurate and truthful company data, records and reports. We will be transparent and ensure that issues are raised to an appropriate level on a timely basis.

5. Health & Safety

Denison aims to provide a safe, healthy, injury free environment, as well as a positive team culture for our employees, contractors, visitors and other stakeholders. We aim to carry out our business activities in a manner consistent with applicable health and safety laws and regulations. We recognise Denison Employees' right to disconnect, based on their position and/or key duties.

We commit to learn and follow safe work practices and all Health and Safety policies and procedures.

As part of this commitment, we all need to:

- be aware that drugs and alcohol are prohibited at Denison; and
- actively manage the risk of physical and psychosocial hazards.

In practice this means:

- Treating all colleagues with dignity, courtesy, and respect, and refraining from any conduct that could reasonably be expected to cause harm, fear, distress, or injury.
- Communicating constructively and raising concerns promptly and respectfully.
- Cooperating with all reasonable steps taken by management to identify, assess, and control psychosocial risks related to job demands, work design, role definition, required support or management of change.
- Reporting any identified hazards or incidents, including harmful behaviour to a team leaders, HR, or via the designated reporting mechanism.

Refer to:

- ➔ the Drugs, Alcohol and Smoking Policy and Procedure
- ➔ All Health and Safety policies and procedures
- ➔ All HR policies and procedures
- ➔ All the standard operating procedures

6. Equal Employment Opportunity and Anti-Harassment

Integral to a safe work environment, Denison aims to prevent unlawful discrimination and harassment in employment related matters.

Refer to:

- the Equal Employment Opportunity Policy
- the Diversity and Inclusion Policy
- the Anti-Bullying and Harassment Policy

7. Respect for the Environment

At Denison, we are committed to conducting our operations in a manner that safeguards the environment and complies with all applicable environmental laws and regulations. This means actively minimising environmental impact preventing water and ground pollution, limiting air pollution and avoiding land disturbance when possible, and using resources responsibly. We strive for continuous improvement in environmental performance and expect all personnel to report any environmental risks or incidents promptly. Protecting the environment is integral to our reputation and our responsibility to the communities in which we operate, including landholders and cultural heritage.

Refer to:

- Environmental Management Plans, Policies and Procedures
- Land Access Policies and Procedures
- Incident Reporting Procedure

8. IT Protocols

Cybersecurity is critical to protect company assets and maintain the confidentiality, integrity, and availability of information across all digital tools used by the Company.

We use company information systems responsibly, ensuring secure handling of data, proper use of cloud storage, and compliance with account and communication guidelines.

We always seek the IT Manager's approval before using new AI tools, and we make sure that our use complies with security and information classification standards.

Social media engagement should be professional, avoid disclosure of confidential information, and align with this code of conduct, the Company's policies and IT security principles.

Refer to:

- Electronic Mail, Internet and Social Media Policy
- Artificial Intelligence Policy
- Acceptable Use Policy
- Other relevant IT and HR Policies and Procedures

9. Compliance with Company Policies

We will comply with all Company policies as amended from time to time.

10. Implementation and Compliance with this Code of Conduct

10.1 Questions

If we have any questions about a matter or issue, we should consult with any of the following:

- the Managing Director
- the Whistleblower Protection Officer
- the Human Resources Manager

10.2 Reporting

We will report all breaches of this Code of Conduct immediately to our manager or any of the following:

- the Managing Director
- the Whistleblower Protection Officer or
- the Human Resources Manager

Individuals making complaints in good faith will be protected by this code of conduct, however, we understand that disciplinary action may be taken where an allegation is malicious or vexatious.

10.3 Non-Compliance

We acknowledge that non-compliance may lead to disciplinary action. Examples of relevant disciplinary action include verbal or written warnings, counselling on misconduct, suspension (with or without pay) and dismissal.

VER*	Approved By	Approval Date
5	The Board	26/11/2025

Application: This policy applies to the Denison group companies, including Denison Gas Limited and its subsidiaries Denison Gas (Queensland) Pty Ltd, Denison Renewables Pty Ltd and Denison Petroleum Services Pty Ltd.