



## CODE OF CONDUCT POLICY

### 1. Introduction

This Corporate Code of Conduct (the Code) sets out the standards with which the directors, officers, managers, employees and consultants (together "Personnel") of Horizon Gold Limited and its subsidiaries (the Company) are expected to comply in relation to the affairs of the Company's business and when dealing with each other, shareholders and the broader community.

The Board of Directors approves and endorses the Code.

The Company undertakes to make the Code known and accessible to all Personnel. Its management will strive to ensure that the Code is observed in word and in spirit by all who represent the Company.

### 2. Compliance

All Personnel must, comply with all applicable laws, rules and regulations.

Any breach of compliance with this Code of Conduct is to be reported directly to the Managing Director or Chairman, as appropriate.

Where necessary, Personnel must, after consultation with the Managing Director, seek appropriate legal advice to ensure compliance.

### 3. Conflicts

Conflicts of interest are to be avoided and any actual or potential conflict is to be reported to the Managing Director. Personnel must not exploit their position with the Company for personal gain. Personnel must declare to the Managing Director a significant ownership interest in any enterprise which may compromise loyalty to the Company.

Personnel have a duty to bring business opportunities identified through the use of Company property, information or position to the attention of the Company.

Refer to the Company's Related Parties Transactions and Conflicts of Interest Policy which establishes a protocol for directors and management in negotiating and entering transactions between Horizon Gold and related parties

### 4. Fair dealing

All dealings with customers, suppliers, competitors, employees and other stakeholders of the Company are to be conducted with honesty, integrity and objectivity, striving at all times to enhance the reputation and performance of the Company.

### 5. Company assets and property

All assets of the Company are to be properly used in the interests of the Company and must be safeguarded from loss and misuse.

### 6. Knowledge and information

The accuracy, use and handling of information is critical to the Company's integrity and reputation.

Personnel must ensure that information is recorded by them honestly and accurately and is made known to their relevant supervisor so as to enable the Company to meet its obligation to keep the market fully informed about its activities.

Personnel must never make improper use of knowledge, information, documents or other company resources obtained in the course of employment with the Company. Personnel must respect the confidentiality and observe the privacy of information about the Company, its customers and fellow Personnel. The security and proper use of Company information is mandatory.

Personnel must use computer facilities appropriately. Unauthorised use, manipulation or other interference will be treated seriously. For example, private passwords to computer files should be kept confidential, and unauthorised access to confidential information is prohibited.

## **7. Confidential information**

Confidential or commercially sensitive information must not be disclosed without proper authorisation.

## **8. Disclosure and securities trading**

Continuous disclosure obligations are to be met in accordance with the Company's Continuous Disclosure Policy. All Personnel should familiarise themselves with the Company's Continuous Disclosure Policy.

Securities trading must be conducted in compliance with the Company's Securities Trading Policy. All Personnel should familiarise themselves with the Company's Securities Trading Policy.

## **9. Health, safety and environment**

The Company is committed to protecting the health and safety of its Personnel in accordance with its Occupational Health & Safety Policy.

The Company is also committed to protecting the environment in the conduct of its operations in accordance with its Environmental Policy.

All health, safety and environmental obligations and good practices are to be recognised, respected and adhered to.

## **10. Employment practices**

The Company subscribes to good employment practices, specifically:

- a. all employment practices are to be fair and non-discriminatory;
- b. a safe system of work is to be maintained;
- c. all forms of discrimination, harassment and bullying are prohibited; and
- d. the privacy rights of all individuals associated with the Company are to be respected.

## **11. Harassment, bullying, vilification and unlawful discrimination**

Harassment (including sexual harassment), bullying, vilification and unlawful discrimination by any member of the Company is unacceptable and contrary to Company policy. Harassment, bullying, vilification and unlawful discrimination may:

- a. create an intimidating hostile, offensive or distressing work environment;
- b. adversely affect the health and performance of a person or groups of employees;
- c. lead to increased absenteeism, reduced employee productivity and motivation;
- d. result in the loss of experienced and skilled employees through resignation;
- e. adversely affect a person's recruitment, level of appointment, promotion and progression opportunities;
- f. adversely reflect on the integrity and standing of the Company; and/or
- g. increase the risk of the Company as an employer to be exposed as being vicariously liable.

The Company expects all staff and contractors to ensure that their behaviour meets appropriate standards and contributes to a productive workplace.

## **12. Gifts and entertainment**

All business entertainment received or provided is to be reasonable and properly authorised. Only gifts that are not in cash or equivalent, are of small value (< \$200) and are appropriate to the business relationship may be accepted. Personnel must not under any circumstances make offers of, or receive, bribes or other improper payments.

## **13. Reporting**

Any matter which Personnel believe to be a breach of a law or this Code, should be brought to the attention of the Managing Director or the Company Secretary for guidance.

Any person reporting such breaches will be protected from retribution.

## **14. Periodic Review of Code**

The Company will monitor compliance with this Code of Conduct periodically by liaising with the Board, management and staff especially in relation to any areas of difficulty which arise from this Code of Conduct and any other ideas or suggestions for improvement of it. Suggestions for improvements or amendments to this Code of Conduct can be made at any time by providing a written note to the Managing Director.