

CODE *of* CONDUCT

→ Promoting **Integrity, Professionalism** and **Transparency**



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1.
Message from
the Chief
Executive Officer

1. Message from the Chief Executive Officer



Dear Colleagues and Friends

For over a decade Mainstream Renewable Power has been at the forefront of the global transition from fossil fuels to renewable energy and has earned a reputation as of a world class developer and industry leader.

Our vision and mission to lead the clean energy revolution are supported by a set of core values and an ethos of doing the right thing the right way.

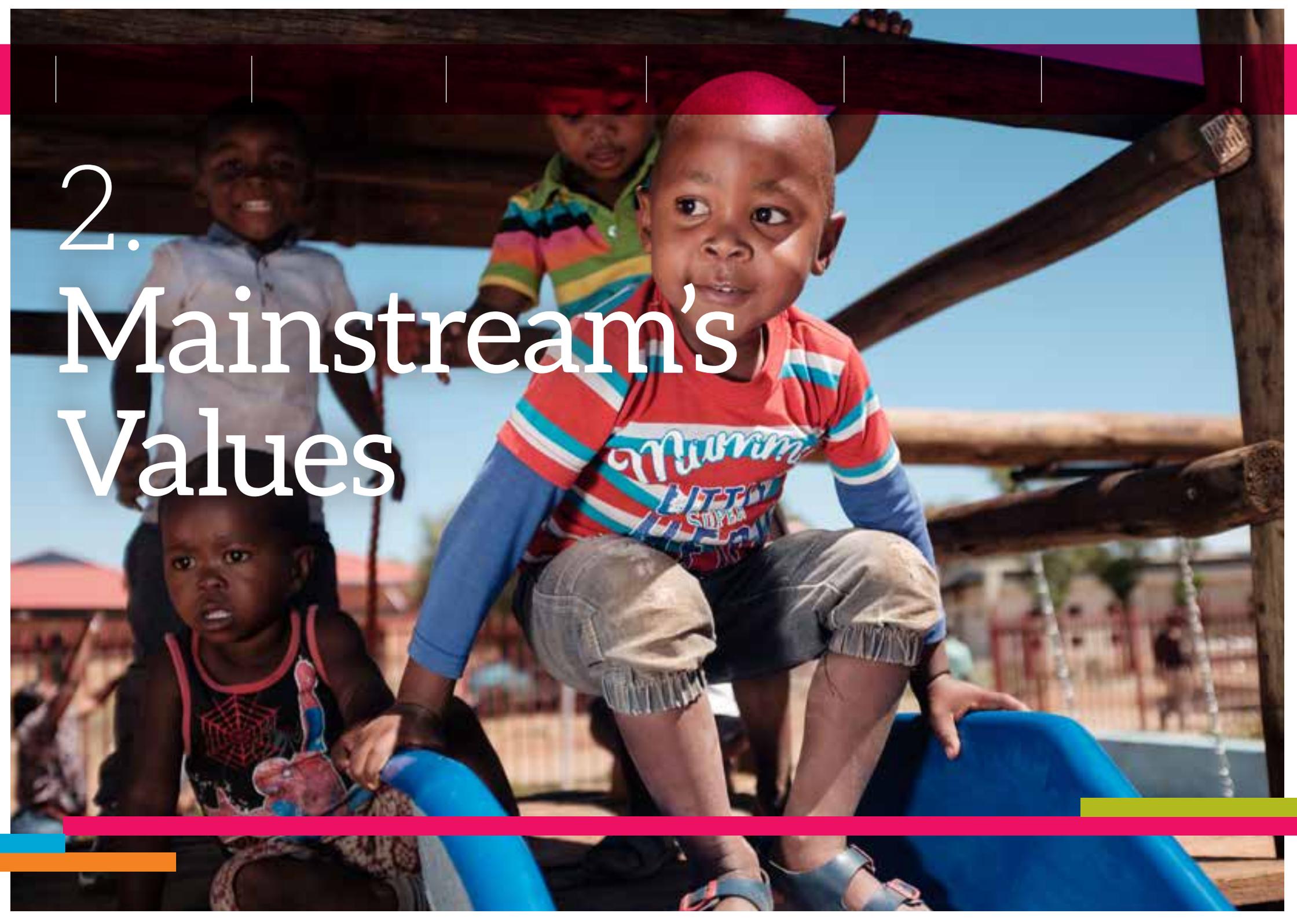
At Mainstream we work tirelessly to uphold those values in all that we do. Our reputation as an industry leader is an achievement we hold with pride and guard with care. It is built on the continuous dedication, perseverance and passion of our people, –and without you Mainstream would not be the company of which we are so proud today.

Our reputation is our most valuable asset but it is the most vulnerable. All it takes to damage it, or even destroy it, is one careless lack of judgement, an ill-considered comment or one unethical decision. Mainstream’s reputation is in your hands and this is why it is essential that we conduct our business in accordance with this Code of Conduct.

The Mainstream Code of Conduct applies to anyone who represents Mainstream, including our employees, directors, contractors, partners, suppliers and other third-parties. I ask you to read it carefully and use its principles to help guide your conduct both personally and professionally in all your activities for and with Mainstream.

Thank you for your support and I look forward to sharing Mainstream’s continued success with you in the years ahead.

Mary Quaney
Group Chief Executive Officer



2. Mainstream's Values

2. Mainstream's values



Mainstream has a global team but wherever we are, we all share the same values:

We believe in a **Safe Environment** for our people. By putting safety first, we have created an environment in which people work at their best, assured in the knowledge that their security is our priority.

We believe in showing **Personal Respect** for everyone we deal with. Respect forms the core of the most successful relationships and relationships are the foundation block of our business. Where there is mutual respect, trust is established and partnerships thrive.

We believe that by **Working Together** as a team, we deliver more. We won't achieve our vision in isolation. By coming together, sharing information and working towards a common goal, we empower each other to deliver a sustainable future and share in its success.

We believe that an **Entrepreneurial Approach** will find the solutions others can't see. The world is facing monumental challenges and we won't overcome them by conventional thinking. This is the time for finding new ways. Those with innovative concepts and creative solutions, coupled with the commitment to deliver them, will lead the way forward.

We believe in a **Sustainable Approach** to everything we do. We think about tomorrow and how today's actions will impact our future. It's central to everything we do. Taking the long-term view is fundamental to the success of our business, to the relationships that we form and for the future of our planet.

We believe that by embracing **Innovation** we will stay ahead of the game. Our success reflects our flexibility and openness to embrace innovation across all our markets and business activities, reducing cost and maximizing performance. Only by driving good practice and new ideas will we develop as a team, grow as a business and evolve as an industry.

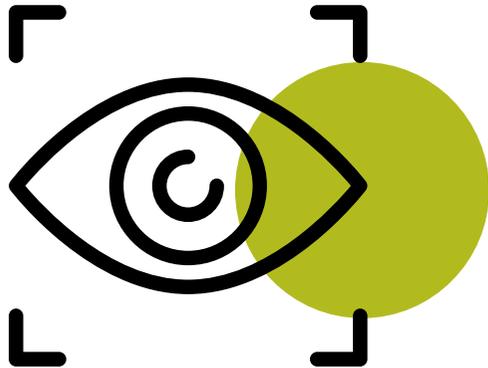
We believe in conducting our business to the highest levels of **Integrity** with a strong and consistent moral code. Acting with integrity is about more than our company's image and reputation or avoiding legal issues. It is about sustaining a place where we all are proud to work and ultimately knowing that we have done the right thing. This means conducting our business openly and according to the highest standards of professionalism, honesty and integrity.

Our vision is a world electrified by renewable energy

3. Overview



3. Overview



3.1 Purpose

The Mainstream Code of Conduct has been developed to communicate mandatory standards and behaviours which support our organisational culture.

Specifically, the Code of Conduct seeks to:

- a) Establish **clarity** around the ethical standards which must be upheld when representing Mainstream;
- b) Communicate the **behavioural expectations** and requirements which all internal and external stakeholders must comply with when representing Mainstream;
- c) Inform and guide strategic and operational **decision-making processes** and standards throughout the organisation; and
- d) Continue to establish Mainstream as a **safe, inclusive and socially responsible environment** to work in.

3.2 Scope

The Mainstream Code of Conduct applies to all employees, secondees, apprentices, trainees, volunteers, executives, directors (internal stakeholders) of Mainstream Renewable Power, and to all entities and their personnel (including hired-ins) where Mainstream, directly or indirectly, effectively controls 90% or more of the shares and votes in the entity in question. It also applies to intermediaries, lobbyists, consultants and others who act on behalf of said companies.

Suppliers, contractors, joint venture partners, intermediaries, lobbyists, consultants and other third parties (external stakeholders) acting on behalf of Mainstream Renewable Power and its subsidiaries are also expected to adhere to standards which are consistent with this Code of Conduct and applicable laws and regulations, and Mainstream shall do its best to ensure such adherence.

The Code of Conduct applies whenever you are representing Mainstream, whether you are working from home, in another office, in the field, or during work-related activities such as conferences, functions, travelling for work or participating in training activities.

The Code of Conduct is not an exhaustive list of expected behaviours in every aspect of work, rather together with the Mainstream policies and procedures it provides a framework that aids in decision-making when faced with personal and ethical dilemmas. Where relevant the appropriate Mainstream policy or procedure has been linked to this Code.

3.3 Our Responsibilities

The Code of Conduct sets out our obligations with the Mainstream values at its core.

As someone in the scope of the Code of Conduct, you are required to:

- Follow Mainstream policies, guidelines and procedures (all internal stakeholders, and where applicable for external stakeholders);
- Comply with applicable laws, regulations and requirements in all jurisdictions;
- Behave in accordance with the Mainstream values and the Code of Conduct;
- Report any misconduct or inappropriate behaviour in accordance with the Speaking Up Procedure; and
- Ensure all mandatory compliance training assigned to you is completed as a priority and in a timely fashion.

All internal and external stakeholders must be aware of and comply with this Code of Conduct at all times.

It is the responsibility of all internal and external stakeholders to ensure they have read, understood, and comply with the Code of Conduct.

Responsibilities and Implementation

Personal Responsibility

As a Mainstream Renewable Power internal stakeholder, you shall strive to exercise good judgement, care and consideration in your service for Mainstream. You are expected to familiarize yourself with, sign off on, and perform your duties in line with the principles set forth herein. If you need advice in handling a specific ethical dilemma, you are advised to consult with your line manager or other appropriate authority.

Senior Management Team and Line Managers are responsible for communicating the requirements in the Code of Conduct to all their direct reports. Managers are also responsible for promoting and monitoring compliance with the Code of Conduct within their respective area of responsibility.

The Board of Directors and the Chief Executive Officer are responsible for safeguarding, implementing and overseeing the management of this Code of Conduct.

The CEO shall ensure that stakeholders are aware of and comply with this Code of Conduct, and that annual Code of Conduct training is conducted for the company's employees, and that the employees, as part of such training or other suitable process, sign that they have read and understood the Code of Conduct.





3.4 Upholding the Law

Mainstream is committed to ensuring that all internal and external stakeholders always comply with the applicable laws, in each jurisdiction in which we operate.

Mainstream recognises that our global footprint across several jurisdictions means that we must comply with a number of complex and cross jurisdictional laws, and all internal and external stakeholders are expected to familiarise themselves with these laws.

In any instances where local customs, practices or traditions conflict with this Code of Conduct, all internal and external stakeholders are expected to follow the law and the Code of Conduct. If in doubt, consult the Legal & Compliance team for further guidance.

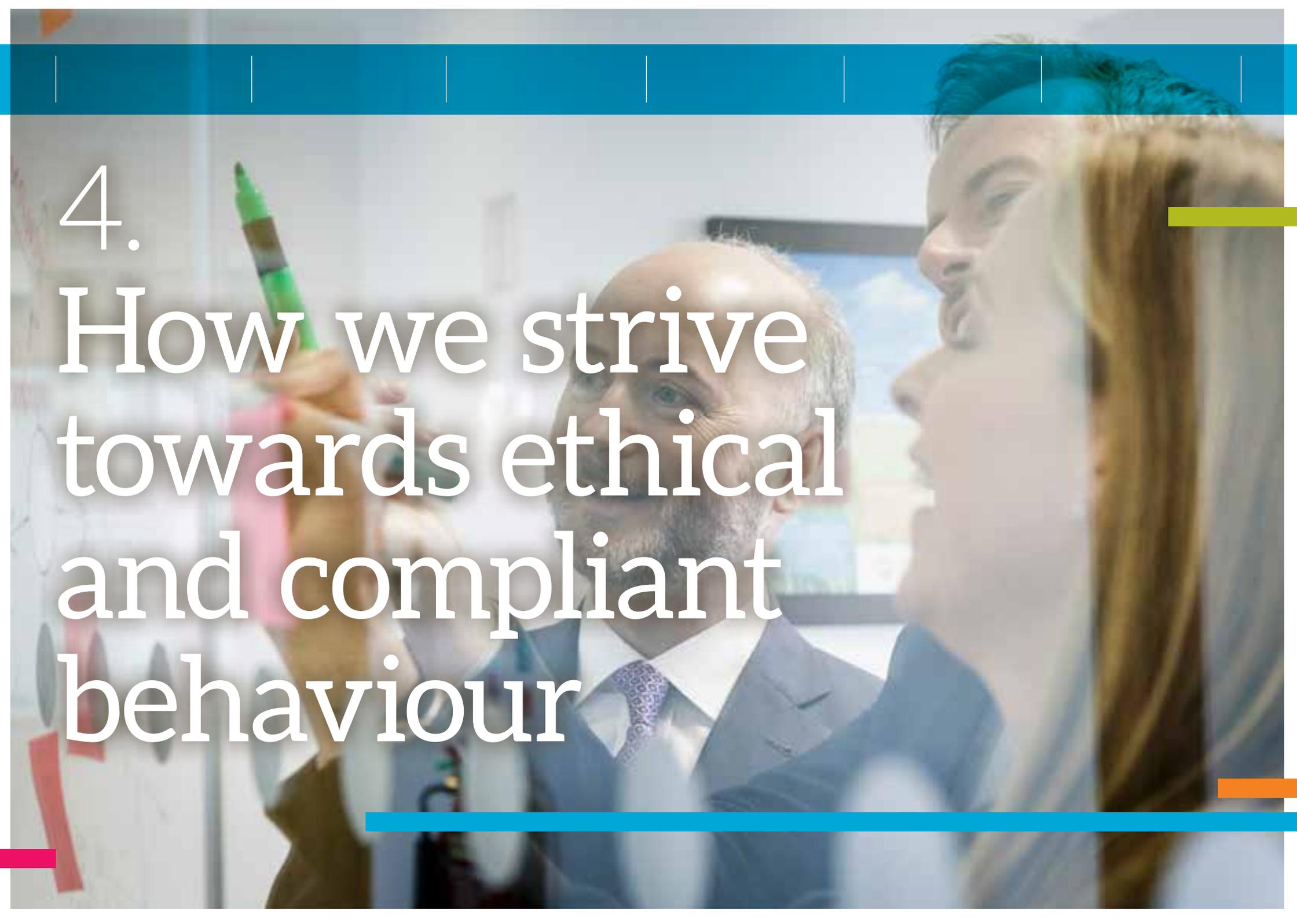
3.5 Breach of this Code

We expect all internal and external stakeholders to act in compliance with the Code of Conduct, and a failure to do so may significantly harm Mainstream's reputation and ability to comply with all applicable laws.

In instances where an actual or potential breach of the Code of Conduct occurs, an investigation will be conducted and it may result in disciplinary actions.

3.6 Annual Compliance Declaration

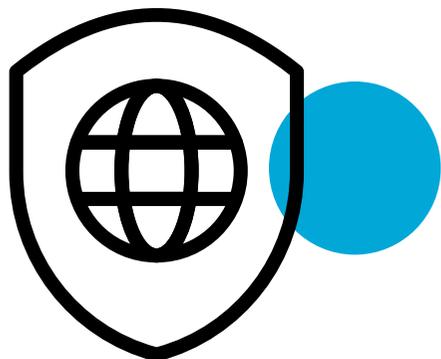
All internal stakeholders are expected to provide an annual declaration which confirms that they have read and familiarized themselves with this Code of Conduct and to the best of their knowledge, they have complied with this Code of Conduct.

A man in a blue suit and purple tie is pointing at a whiteboard with a green marker. A woman with long blonde hair is looking at him. The background is a blurred office setting. There are decorative blue, green, and orange bars at the top and bottom of the image.

4.

How we strive
towards ethical
and compliant
behaviour

4. How we strive towards ethical and compliant behaviour



4.1 Holding Each Other to Account

Mainstream expects, and actively encourages all internal and external stakeholders to proactively hold each other to account for the ethical appropriateness of behaviours which are observed in the workplace.

4.2 Speaking Up

Mainstream is committed to achieving the highest standards of ethical behaviour in the conduct of its business and other activities worldwide.

Any internal or external stakeholders have a responsibility to raise a concern if they suspect any illegal, unethical conduct and/or violation to this Code of Conduct and Mainstream Policies and Procedures has occurred.

You can ask questions or raise concerns in good faith through the following channels:

- Your line manager, or your line manager's manager;
- Your local HR business partner;
- Your local Legal and Compliance team, or the Group Ethics and Compliance team;
- The Speak Up Line; or
- A safety representative, union representative or lawyer.



The options to ask questions or raise concerns are not listed in any particular order and, you may also report matters directly to the Chief Executive Officer or to any member of the Audit Committee.

You may also notify a public supervisory authority or other public authority in your region



SPEAK UP LINE

Mainstream Speak Up Line is an independent 24/7 reporting service provided by Convercent, and managed by the Mainstream's Group Chief Compliance Officer, where any internal or external stakeholder can raise questions or issues, and choose to remain anonymous, where permitted by law.

You can access the Speak Up Line and raise concerns in writing or orally from anywhere in your local language via:

- Online by clicking this [Mainstream Speak Up link](#);
or
- By making a phone call via the local contact number on the [Mainstream Speak Up Line website](#).

When contacting the Speak Up Line by phone you will be put in touch with an operator who is trained to receive a report about concerns in the workplace that you feel cannot be addressed in any other way.

Your call will not be tape recorded, and calls received by the Speak Up Line will be treated confidentially and should you wish, guarantee your anonymity.

What Happens When a Concern is Raised:

- You may choose to remain anonymous, where permitted by law
 - Where this is not possible, or you identify yourself, we will always seek to protect your identity

- Everyone involved in raising an ethical concern or the investigation of one should respect the confidentiality of the processes set out in the Speaking Up Procedure

- All concerns will be assessed and investigated impartially, fairly and so far as possible confidentially
 - The outcome of assessments and investigations are reported to the Ethics Committee or the delegated Committee for locally-managed matters
 - Violations of this Code of Conduct may result in disciplinary actions

For further details on Mainstream's approach to Speaking Up, please refer to the Speaking Up Procedure.

Non-Retaliation

Every person associated with Mainstream is always encouraged to speak-out freely, as the business promotes openness and transparency.

Mainstream fully supports anyone who raises concerns in good faith and will ensure that there is no retaliation against them. There is zero tolerance towards any form of retaliation or victimisation of persons who have raised concerns honestly and in good faith.

A woman wearing a yellow hard hat and a high-visibility vest is writing on a clipboard. She is standing in front of a large pile of dark rocks or rubble. In the background, an orange excavator is visible. The image has a blue and orange color scheme with white text.

5.

Ethical standards and culture at Mainstream

5. Ethical standards and culture at Mainstream



5.1 Safe, Healthy and Secure Workplace

Our responsibility is to provide a safe and healthy work environment for all internal and external stakeholders which may be involved with or affected by our operations.

The scope of safety, health and security ranges from small office issues to project development, construction, and asset operations. Safety is our number one priority in everything we do.

As a result, safety, health, and security are embedded in Mainstream's values and throughout the organisation at all levels thanks to the implementation of international recognised standards such as ISO 9001 and ISO 45001. It is a fundamental priority at Board level and this filters through the organisation by our dedicated Safety Health Environmental and Quality ("SHEQ") team which communicates matters to all global operations.

→ *Stop Work Authority (SWA) is one other essential measure to the prevention of incidents which could result in serious injury or fatality. Mainstream's Global SHEQ Standard, the "Proactive Safety Standard", outlines that each Mainstream employee and contractor is empowered to call a halt to work as soon as somebody identifies a situation which they feel is unsafe. Everyone has an obligation to stop working as soon as they are requested to do so by somebody invoking the SWA.*

Mainstream's approach to safety is based on five key principles:

- a) **Prevention** – Through risk management, policies, global standards, awareness, and culture reinforcement based on the proper implementation of ISO 45001 and 9001 systems, we can prevent ill health and injury to our employees, contractors and others involved in our business activities, as well as continuously improve processes in order to make Mainstream a major renewable company competitor.;
- b) **Leadership** – Our transparent safety leadership by both employees and management will determine our safety, health, and security performance;
- c) **Communication** – We believe that communication of responsibilities, performance, learning and best practice is an essential part of our approach to safety, health, and security management;
- d) **Review** – As our business grows we will continuously review all aspects of our activities to ensure that the associated risks are appropriately managed. Mainstream remains committed to encourage employees and contractors to use the "Stop Work Authority" policy when work conditions are not safe to continue; and
- e) **Improvement** – While we will ensure compliance with stakeholders requirements and country/markets legislation, Mainstream will also seek to continually improve all aspects of its processes by having a sound quality programme in place, which helps manage performance in most efficient ways.

5.2 Harassment and Intimidation

Mainstream has a zero tolerance policy for any actions or behaviours which amount to, or could be potentially perceived as harassment or intimidation.

We are committed to ensuring that all Mainstream stakeholders are treated with, and treat others with respect, dignity, decency and fairness and we will not tolerate any form of violence, harassment, intimidation, degrading treatment or sexually offensive behaviour or abuse towards any internal or external stakeholders.

All internal and external Mainstream stakeholders are expected to take caution with their behaviour to ensure that they do not engage in any inappropriate behaviour, and are strongly encouraged to always consider whether their behaviour and actions would be considered appropriate by others. Comments or any other forms of offensive messages, derogatory remarks or inappropriate jokes are unacceptable.

If you become aware of any behaviour which is, or could reasonably be considered to be violent, harassment, intimidation or abuse, please report this immediately.

Your Responsibilities:

- a) Take steps to create a good working environment – free of all harassment;
- b) Never engage in abuse, harassment, bullying, workplace violence, sexually offensive behaviour or other behaviour that colleagues or business partners may regard as threatening or degrading;
- c) Respect other people's customs and culture;
- d) If you become aware of any situation in breach of the above principles, speak up and report your concern.

5.3 Human and Labour Rights

Mainstream is committed to achieving the highest standards of ethical behaviour in the conduct of our business and activities worldwide.

We support and respect the protection of internationally proclaimed human and labour rights, such as the UN Guiding Principles on Business and Human Rights, the International Labour Organisation on Fundamental Principles and Rights at Work, the International Bill of Human Rights, the UK Modern Slavery Act, the OECD Guidelines for Multinational Enterprises, as well as all applicable local labour laws and regulations. Mainstream shall ensure that its business operations do not cause or contribute to any infringements to human and labour rights as set out above.

Mainstream also recognises and acknowledges that the nature of our business, the industry we operate in, and the jurisdictions in which we operate mean that the organisation is faced with an inherent risk of exposure to modern slavery through our deep supply chains.

To this end, we will not tolerate slavery or human trafficking or abusive or unfair treatment in any part of our own business or in any of our supply chains and have developed and implemented robust modern slavery prevention controls and processes to mitigate any potential human rights abuses or modern slavery.

Our policies, procedures, and processes in relation to risk management, due diligence, procurement and human resources allow us to express and live out our commitment to taking steps to ensure that slavery and human trafficking play no part in our own business or in our supply chains.

Your Responsibilities:

- a) Never cause or contribute to the infringement or circumvention of human and labour rights;
- b) Respect the personal dignity, privacy and rights of all individuals you interact with in connection with your work and those affected by our business operations;
- c) Notify your manager in writing if you become aware of any situation in breach of the above principles.

5.4 Diversity and Inclusion

Mainstream seeks to hire and promote the best talent by providing a dynamic environment that brings people with diverse skills and ideas together. An inclusive, diverse workforce fosters innovation and enhances Mainstream's position in the market.

Mainstream relies on the contribution of people who best understand the cultures and operations in the countries and jurisdictions in which we do business. Mainstream has always been committed to hiring people with the right expertise and talent.

Our employees can expect a workplace free from harassment and discrimination. We do not tolerate discrimination against any employee based on age, gender, sexual orientation, disability, race, nationality, political opinions, religion or ethnic background, or any other basis prohibited by law.

We are committed to

- Attracting and selecting a diverse range of people based on merit and through fair and equitable processes;
- Welcoming a diverse range of people and providing a workplace that is both welcoming and inclusionary;
- Providing a workplace that is free from inappropriate conduct such as, discrimination, bullying, harassment, vilification, victimisation and violence;
- Basing work-related decisions on merit;
- Educating and training our employees on the value of diversity and their roles and responsibilities in relation to diversity and equal opportunity; and
- Fostering diversity through reviewing the demographic profile of the workforce and ensuring talent solutions are initiated to build a diverse workforce.

5.5 Work-related Events

Mainstream is committed to providing a safe, productive, and welcoming environment at all work-related events and activities and this Code of Conduct applies to all Mainstream related events, including, but not limited to the following:

- Mainstream social events such as breakfasts, lunches, dinners, functions, birthdays, parties and team building events;
- Mainstream corporate events such as charity events, workshops, industry conferences, networking events and shareholder and board meetings;
- Events sponsored by third-party partners, but held in conjunction with a Mainstream event; and
- Events held by third-party partners, but attended by Mainstream stakeholders.

Regardless of the occasion, a Mainstream stakeholder, when identified or representing as such, must carry him/herself accordingly, including in social media and other public forums.



5.6 Environmental Responsibility

Mainstream's core business is designed to have a positive impact on the environment and on the sustainability of human activity. We are committed to ensuring that environmental protection and awareness are at the forefront of all our activities.

Mainstream is committed to doing more than simply complying with environmental legislation. We aim to persuade governments to set ambitious environmental and sustainability standards. We aim to continually improve our environmental performance through the setting, implementing and monitoring of high environmental and sustainability targets. Environmental legislation will vary from country to country but we insist on the highest standards regardless of local law.

We are committed to:

- Promoting environmental awareness and improving the environmental mind-set amongst our employees;
- Promoting environmental sustainability in all our activities, including the reduction of waste and carbon dioxide (CO₂) emissions;
- Ensure that the working methods adopted by Mainstream and any third-party working on our behalf minimise damage to the environment; and
- Develop our projects according to the Mainstream Global Development Standard.

We are all responsible for reducing our environmental impact and Mainstream encourages all employees to continuously promote ways to do this in both their personal and professional capacities.

5.7 Community Engagement

At Mainstream we aim to be good neighbours. Our values and our experience have taught us the importance of the community in which we develop our sites. The Mainstream Global Development Standard helps ensure we have the best possible relationship with the communities we work in.

We are committed to:

- Gaining an understanding of the local communities we operate in, including their history and traditions;
- Looking at all situations from the community's point of view;
- Consulting and communicating with the local community from an early stage through meetings, formal letters, advertising, social media, project websites and open days to enable the community and Mainstream to build a strong relationship of mutual trust; and
- Ensuring we follow the Mainstream community charter.

5.8 External Communication

Mainstream's communications team is responsible for all statements made to the media, including press releases and responses to media queries.

Our Communications Protocol sets out how media enquiries must be dealt with and if you have any questions or concerns please contact Mainstream's Head of Communications, or your local Corporate Affairs team, for guidance.

If you are asked to respond on behalf of Mainstream to a question, please ensure you get the consent of the Head of Communications or your local Corporate Affairs team before making any public statements.



5.9 Property, Information and Assets

Mainstream expects and requires all internal and external stakeholders to protect all Mainstream property and assets from theft, misuse, loss, damage or destruction.

Examples of property and assets at Mainstream include, but are not limited to the following:

- Mainstream's reputation;
- Mainstream offices and all equipment within the office;
- Mainstream development and construction sites, and all equipment on these sites;
- IT Hardware, systems, database and infrastructure;
- Any commercial and non-commercial partnerships and agreements which Mainstream has;
- Any solar, battery (BESS), or wind generation assets whether currently operational or not, real estate, land or commercial property owned and/or operated by Mainstream; and
- Intellectual property, including but not limited to know-how, design rights, databases, patents and trademarks.

Your Responsibilities:

- a) Protect Mainstream's property, information and assets from theft and loss;
- b) Report any security breaches of property to according to our internal procedures;
- c) Report any theft, waste or misuse of company information and assets according to our internal procedures;
- d) Maintain electronic files and archives in an orderly manner.

5.10 Reporting, Accounts and Record Keeping

It is the responsibility of all stakeholders to produce and maintain transparent and accurate reports, registers and records for internal procedures, operations, key decisions and transactions with a clear audit trail.

All accounting and financial information, as well as other disclosure information, must be accurately registered and presented in accordance with laws, regulations and relevant accounting standards.

Mainstream requires employees to maintain an exhaustive list of records as outlined in each associated policy and/or procedure.

Mainstream is committed to ensuring that it communicates all relevant business and financial information in a timely and transparent matter, to all internal and external Mainstream stakeholders.

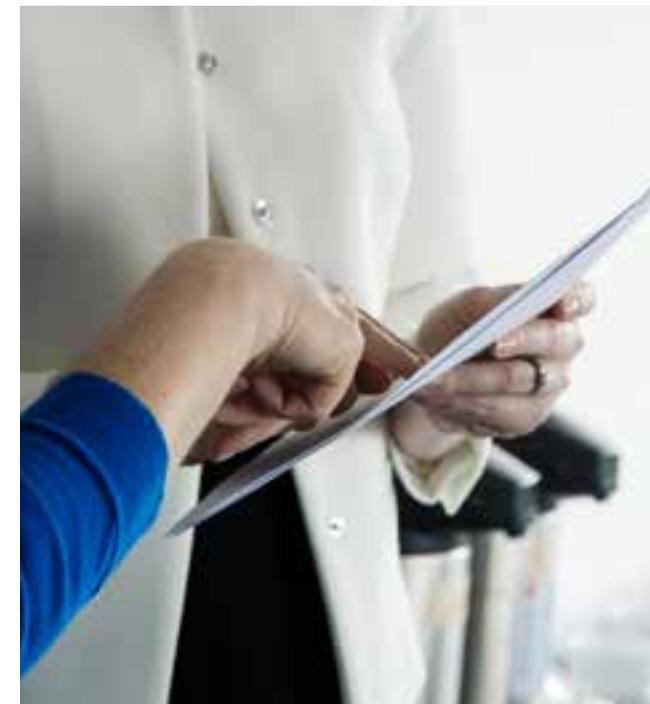
Additionally, where required by any applicable laws or contractual agreements, Mainstream will publicly disclose all relevant business and financial information.

All internal and external Mainstream stakeholders are expected to treat business and financial information as confidential, unless otherwise informed by the Communications team and/or the Legal and Compliance teams.

All Mainstream financial information and statements are validated by Mainstream's external audit partner.

Your Responsibilities:

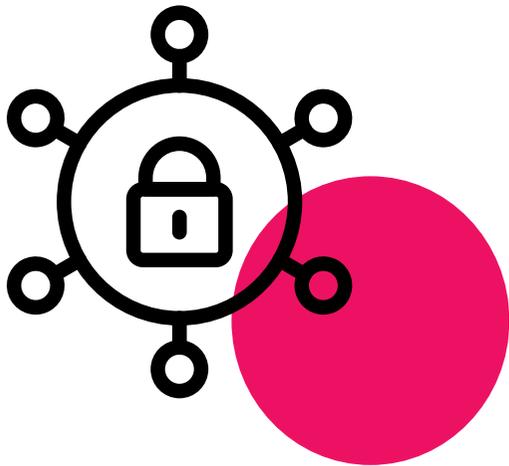
- a) Protect Mainstream's property, information and assets from theft and loss;
- b) Report any security breaches of property to according to our internal procedures;
- c) Report any theft, waste or misuse of company information and assets according to our internal procedures;
- d) Maintain electronic files and archives in an orderly manner.



6. Integrity standards and expectations



6. Integrity standards and expectations



At Mainstream, the following integrity standards and expectations are inherent to the way in which we do business, and in many instances, detailed procedures have been developed to provide prescriptive guidance around these expectations.

6.1 Bribery and Corruption

Bribery occurs when an individual or organisation offers, provides, receives, or requests something of value in instances where a favour, action or obligation has been requested in return from another individual or entity.

Any instances of actual or perceived bribery and corruption are likely to negatively impact Mainstream's reputation and can result in legal liabilities for the company and the individuals involved.

Mainstream restricts the use of commercial third parties to support sales-related activities. Any use of third-party representatives shall be done in accordance with the relevant internal procedures and be approved by Mainstream's Chief Executive Officer.

Mainstream is committed to complying with all anti-bribery and corruption laws and has a zero tolerance policy for any actions or behaviours which amount to, or could be potentially perceived as bribery or corruption.

Your Responsibilities::

- a) Ensure that you understand, and comply with the Mainstream Anti-Bribery & Corruption Policy and Procedure;
- b) Ensure that all payments are legal and made in accordance with the established payment approval procedure, with records maintained for all requests and management approvals;
- c) Never (either directly or indirectly through a third-party) offer anything of value to influence the actions or decisions of any internal or external persons, including any public official or private party, who you engage with on behalf of Mainstream;
- d) Ensure that all gifts and hospitalities receive the appropriate approvals, and are recorded in the Mainstream Disclosures Register;
- e) Do not make facilitation payments under any circumstances, even if not considered to be a criminal offence under certain jurisdictions ("Facilitation payments" are small unofficial payments aimed at expediting or securing the provision of products or services to which you or the company is legally entitled);
- f) Do not use third-party representatives without specific approvals; and
- g) Report any actual or potential occurrences of bribery and corruption in accordance with the Speaking Up Procedure.

Examples of Bribery & Corruption

- Making a political donation for the express purpose of obtaining or receiving favourable outcomes;
- Providing or receiving a facilitation payment to expedite or accelerate the provision of services for which the entity or individual is entitled too; or
- Providing or receiving a payment or providing gifts and/or hospitality to an entity or individual to win a contract.

6.2 Fraud

Fraud occurs when an entity or individual dishonestly obtains a tangible or intangible benefit or causes a harm or loss to others by behaving in a manner which is fraudulent.

Fraudulent behaviour typically involves a number of key factors, including deception of others, concealment of important information, fabrication of information and coercion or exploitation of others.

Any instances of actual or perceived fraud are likely to cause a significant negative consequence for Mainstream's reputation and can result in legal and criminal liabilities for the company and the individuals involved.

Mainstream is committed to complying with all anti-fraud laws and has a zero tolerance policy for any actions or behaviours which amount to, or could be potentially perceived as fraud.

Your Responsibilities:

- Ensure that you understand, and comply with the Mainstream policies and procedures;
- Ensure that you always act truthfully, honestly and in the best interests of Mainstream;
- If in any doubt over the accuracy, legitimacy and appropriateness of any actions or decisions, consult with the Legal and Compliance teams for guidance; and
- Report any actual or potential occurrences of fraud in accordance with the Speaking Up Procedure.

Examples of Fraud

- Falsification of expense claims;
- Intentionally incorrect financial reporting;
- Providing false or misleading information; or
- Theft of company property, including information and physical assets.





6.3 Money Laundering and Terrorism Financing

Money laundering refers to an act, or acts which are designed to conceal the true source of the funds obtained through criminal behaviour, to enable criminal entities and individuals to enjoy the benefits of these funds.

Terrorism Financing refers to the raising of funds to enable the financing of terrorist organisations or activities, which are usually funded and obtained through criminal behaviour.

Mainstream is committed to only engaging with entities and individuals of good and reputable standings, who have been validated throughout our due diligence processes and procedures.

Mainstream is committed to complying with all anti-money laundering and counter terrorism financing laws and has a zero tolerance policy for any actions or behaviours which amount to, or could be potentially perceived as money laundering.

Your Responsibilities:

- Ensure that you understand, and comply with the Mainstream policies and procedures;
- Ensure and seek to prevent that Mainstream's financial transactions and business activities are not used to launder money;
- Ensure that the appropriate due diligence checks are completed before engaging in business with any new, current or former entities or individuals;

- Ensure that all business activities are legitimate and involve legitimate funds, in accordance with the payment method specified in the contractual agreement with the third party partner;
- Exercise caution if there are irregularities in the course of receiving or providing payments, such as if there are offshore bank accounts involved or accounts that are not normally used by the party in question;
- If in any doubt, consult with the legal and compliance and/or tax and finance teams for guidance; and
- Report any suspicious transactions or incidents in accordance with the Speaking Up Procedure.

Examples of Money Laundering and Terrorism Financing

- Utilising the proceeds of crime to finance the development of property or assets;
- Utilising the proceeds of crime to finance the purchasing of property or assets;
- Utilising the proceeds of crime to finance a terrorism organisation or attack;
- Establishing a business and creating false revenue records to disguise the proceeds of crime as legitimate revenue; or
- Making small deposits into bank accounts (typically less than \$10,000) on a frequent and consistent basis, where the source of funds are the proceeds of crime.

6.4 International Sanctions and Export Controls

International sanctions refer to political and economic restrictions which are imposed against specific countries, entities and individuals.

International sanctions do not involve the use of military force, and are implemented in an attempt to change the behaviour of sanctioned countries, entities and individuals in instances where violations of human rights or threats to international peace have occurred.

Export control laws impose restrictions and prohibitions over certain sale, shipment, electronic transfer, provision, or disclosure of information, software, goods, assets, funds, and services across national borders or involving parties subject to economic sanctions.

Mainstream has a zero tolerance policy for engaging with countries, entities or individuals who are subject to international sanctions and is committed to complying with all applicable sanctions laws and all applicable export control laws, in all jurisdictions we operate in.

Your Responsibilities:

- a) Ensure that you understand, and comply with Mainstream policies and procedures;
- b) Ensure that the appropriate due diligence checks are completed before engaging in business with any new, current or former entities or individuals;
- c) Think carefully about the potential impact of export control laws before transferring goods, technology, software or services across national borders and make sure it is in line with all applicable export control laws;
- d) Remain alert and attentive to any major international events which occur and if in any doubt, check with the legal and compliance team regarding potential sanctions; and
- e) Report any suspicious transactions, incidents or third-party agreements in accordance with the Speaking Up Procedure.

Examples of International Sanctions and Export Controls

- Restrictions on trade in goods and services or on engaging in commercial activities;
- Travel bans for individuals;
- Custom clearance documents, license and/or approval from national authorities prior to export.



6.5 Conflicts of Interest

A conflict of interest occurs when personal relationships, participation in external activities or interest in another venture can influence or could be perceived to influence a person's decision-making when acting for Mainstream.

A personal relationship could include spouse or other immediate family, relative and close personal friends. All dealings, transactions and contracts should be entered into for the best interests of Mainstream, and any personal or business benefits or interests should not influence the decision to enter into any such agreements.

In some instances, a conflict of interest will be deemed to be manageable when safeguards and barriers can be established to prevent the conflict from inappropriately influencing business decisions, but in most instances conflicts of interest will be considered unmanageable.

Mainstream is committed to ensuring that the organisation is compliant with all applicable conflict of interest laws as well as avoiding any conflicts of interest which are unmanageable.

Your Responsibilities:

- a) Ensure that you understand, and comply with Mainstream policies and procedures;
- b) If you have an actual or potential conflict of interest, raise it immediately in accordance with the Mainstream Conflicts of Interest Procedure, and via the Mainstream Disclosures Register;
- c) Do not participate in or attempt to influence any dealings, transactions and contracts where you may have, or could reasonably be suspected to have, an actual or potential conflict of interest;
- d) Where possible, avoid having any external personal or business interests which may come into conflict with Mainstream's key services or third party partners;
- e) As a manager, ensure that conflicted individuals are isolated from any operation, influence, and/or decision-making process associated with the subject of the conflict;
- f) Where a conflict of interest is deemed to be manageable, act in express accordance with any conditions or requirements which are imposed by the legal and compliance team, in accordance with the Mainstream Conflicts of Interest Procedure; and
- g) Report any actual or potential conflicts which you observe in accordance with the Speaking Up Procedure.

Examples of Conflicts of Interest

- An employee has a personal relationship with a subordinate who they are responsible for assessing and managing their performance;
- An employee has a personal relationship with a representative at a third-party company who Mainstream is partnering with and they are responsible for decision-making;
- An employee has a personal relationship with a candidate who is applying for a position at Mainstream and they are involved in the hiring process;
- An employee has a personal business which competes directly with Mainstream, and leverages Mainstream information to win contracts.





6.6 Engagement with Politically Exposed Persons

Mainstream accepts and understands that the nature of our business means that engaging with politically exposed persons is often necessary, but requires extreme caution to ensure that there are no inappropriate influences or conduct when this engagement occurs.

Specifically, Mainstream is committed to mitigating its exposure to dealings, transactions and third-party partnerships which involve a politically exposed persons.

Your Responsibilities:

- a) Ensure that you understand, and comply with Mainstream policies and procedures;
- b) Never, in order to obtain or retain business or other improper advantage in the conduct of business, offer, promise, or give any undue advantage to a public official to make the official act or refrain from acting in relation to the performance of her/his duties. This applies regardless of whether the advantage is offered directly or through an intermediary;
- c) When engaging with politically exposed persons, always do so in a transparent and straightforward manner and exercise the utmost integrity. Always consider whether your conduct would reflect well on Mainstream's reputation, and ensure that it is in accordance with the Code of Conduct;

- d) Ensure that any gifts and hospitalities which are provided to, or received from politically exposed persons are done so in accordance with the Mainstream Gifts and Hospitality Procedure, and recorded in the Mainstream Disclosure Register; and
- e) Report any actual or potential inappropriate conduct or engagement with politically exposed persons which you observe or reasonably in accordance with the Speaking Up Procedure.

Examples of Politically Exposed Persons

- An official or employee of any Government, or any agency, ministry or department of a Government;
- Any person acting in an official capacity on behalf of a Government;
- Official or employee of a company which is owned by a Government; or
- A Candidate for political office or any employees who are supporting their campaign.

6.7 Gifts and Hospitality

Providing gifts and hospitalities to third party partners is a common business practice which is typically intended to assist with the development relationships and expressing of gratitude and appreciation.

However, in instances where gifts and hospitalities are excessive or provided with an expectation or understanding that they are being provided in exchange for a favour or action, they can amount to bribery and corruption.

Mainstream's stance on giving/receiving gifts and hospitalities is that they are only permissible where they would not influence any business decision or cause others to perceive such influence, and they are compliant with local gifts and hospitality laws and the limited circumstances and expenditure limits outlined in Mainstream's Gifts and Hospitality Procedure.

Your Responsibilities:

- a) Ensure that you understand, and comply with Mainstream policies and procedures;
- b) Request and receive approval for all gifts and hospitalities provided or received in accordance with the Gifts and Hospitality procedure;
- c) Ensure that you have confirmed the rules and requirements of the third party partner in relation to gifts and hospitalities;
- d) Never solicit, or accept a gift or hospitality from a third party partner where it may actually, or could be perceived to influence your decision-making, Including situations of contract negotiation, bidding, or award;
- e) All gifts and hospitalities must be recorded in the Mainstream Disclosures Register, regardless of whether they have been approved or declined; and
- f) Report any inappropriate gifts or hospitalities which you observe or reasonably suspect in accordance with the Speaking Up Procedure.

Examples of Gifts and Hospitality

- Tickets to sporting and entertainment events;
- Invitations to breakfasts, lunches or dinners;
- Discounts on goods and services or perishable gifts such as food or alcohol; or
- Customary gifts given during cultural rituals, festivities or ceremonies of birth and/or funerals.



6.8 Donations and Sponsorships

A charitable donation can be defined as a donation (such as cash, gifts, aid, goods or services) given by an individual or a company to a non-profit organisation, charity, trust or private foundation where there is no pre-condition or expectation of a commercial return.

Similarly, sponsorships involve the provision of a benefit to an entity or individual in return for a non-financial benefit such as media attention or reputational benefits, in instances where no conflicts of interest exist.

Mainstream's stance on charitable donations and sponsorships made on behalf of the company is that they are only permissible in instances where they are linked to a legitimate Mainstream project or community engagement initiative.

Mainstream has a zero tolerance policy for, and prohibits political and religious donations of any kind which utilise company funds or resources, or which are made on behalf of Mainstream.

Your Responsibilities:

- a) Ensure that you understand, and comply with Mainstream policies and procedures;
- b) Do not make any political donations which utilise company funds or are made on behalf of Mainstream;
- c) All charitable donations and sponsorships must be recorded in the Mainstream Disclosures Register;
- d) Ensure that all charitable donations and sponsorships have the necessary approvals prior to proceeding, and that appropriate records are maintained; and
- e) Report any inappropriate donations or sponsorships which you observe or reasonably suspect in accordance with the Speaking Up Procedure.

Examples of Appropriate Donations and Sponsorships

- Making a charitable donation to a local organisation in a community which Mainstream operates; or
- Sponsoring a local junior sports team in a community where this is considered to be in Mainstream's benefit.



6.9 Confidentiality

Ensuring the security and appropriate utilisation of all confidential information is a critical component of maintaining Mainstream's reputation as a safe, healthy and secure workplace and a reliable partner.

Mainstream is committed to ensuring that all confidential information is identified, protected, stored and utilised in accordance with all applicable laws and third-party partner expectations.

Your Responsibilities:

- a) You have a duty of confidentiality which also applies after the conclusion of the employment or contractual relationship with Mainstream and for as long as the information is considered sensitive or confidential in nature;
- b) Ensure that a non-disclosure agreement is drafted and agreed with all third-party partners and suppliers prior to any confidential information being shared;
- c) Ensure that all confidential information regarding Mainstream, its people and its third-party partners is kept confidential;
- d) Ensure that you do not use confidential or insider information when dealing in publicly listed shares or other securities;
- e) Do not spread rumours, mislead with false information or manipulate prices;
- f) Ensure that any discussions regarding Mainstream, its people and its third-party partners are conducted privately, and with appropriate stakeholders who are entitled to have that information; and
- g) Report any inappropriate disclosures of information which you observe or reasonably suspect in accordance with the Speaking Up Procedure.

Examples of Confidential Information

- Third-party information which is provided during a competitive bidding or any contract negotiation process;
- Internal employee information; or
- Confidential information related to Mainstream's business performance, processes and plans.



6.10 Fair Competition

Anti-trust laws are designed to protect consumers from any behaviour or predatory business practices which do not allow for fair competition in international and domestic markets.

Mainstream is committed to ensuring that the organisation is compliant with all applicable anti-trust and competition laws, regulations and requirements.

Your Responsibilities:

- a) Ensure that you understand, and comply with Mainstream policies and procedures;
- b) Do not engage in any activities that involve obtaining, receiving, using or sharing non-public competitively or commercially sensitive information without a lawful reason;
- c) Do not share, solicit or leverage any confidential information which would give Mainstream an unfair competitive advantage throughout a competitive bidding process;
- d) If any doubt over the appropriateness of any competition related conduct, always seek advice from the legal and compliance team; and
- e) Report any inappropriate competition related conduct which you observe or reasonably suspect in accordance with the Speak Up Procedure.

Examples of Non-Competitive Practices

- Placing lower bids or withdrawing from a competitive bidding process to enable another competitor to win the applicable contract, in exchange for favours or benefits;
- Engaging with industry competitors to establish fixed prices which do not allow for competitive pricing; or
- Establishment of an industry monopoly through exclusive supply agreements and/or predatory pricing.



6.11 Data Privacy and Protection

Data privacy and protection laws are designed and applied to ensure that personal data is only collected in instances where it is necessary and appropriate to do so, as well as ensuring that there are adequate controls and procedures in place to prevent unauthorised access and utilisation of personal data.

Mainstream is committed to ensuring that all personal data is collected, stored and protected in accordance with all applicable data protection and privacy laws and with our data protection policy and procedure.

Your Responsibilities:

- a) Ensure that you understand, and comply with Mainstream policies and procedures;
- b) If any doubt over the appropriateness of accessing or utilising personal data in your role, always seek advice from the Legal and Compliance team; and
- c) Report any inappropriate accessing or utilisation of personal data which you observe or reasonably suspect in accordance with the Data Privacy Procedure or the Speaking Up Procedure.



Annexure A - Decision-Making at Mainstream

→ Whilst we understand that on some occasions decisions and actions will need to be made and taken quickly, we strongly encourage all Mainstream stakeholders to consider the key questions, listed to the right, before making a decision, or taking an action.

If you are in any doubt over your response to the questions, or if your answer to any of the questions is **NO**, we strongly recommend that you seek advice and guidance from any of the following:

- a) Your line manager;
- b) Your local HR business partner; or
- c) Your local Legal and Compliance team, or the Group Ethics and Compliance team.

IS THE DECISION OR ACTION LEGAL?

IS THE DECISION OR ACTION CONSISTENT WITH THIS CODE OF CONDUCT?

IS THE DECISION OR ACTION CONSISTENT WITH MAINSTREAM'S POLICIES AND PROCEDURES?

IS THE DECISION OR ACTION IN THE BEST INTEREST OF MAINSTREAM?

SHOULD I REASONABLY BE EXPECTED TO MAKE THE DECISION, OR TAKING THE ACTION IN MY ROLE?

WOULD I BE COMFORTABLE IF MY DECISION OR ACTIONS WERE MADE PUBLIC?

WOULD YOU BE COMFORTABLE EXPLAINING MY DECISION OR ACTIONS TO MY FRIENDS AND FAMILY?



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