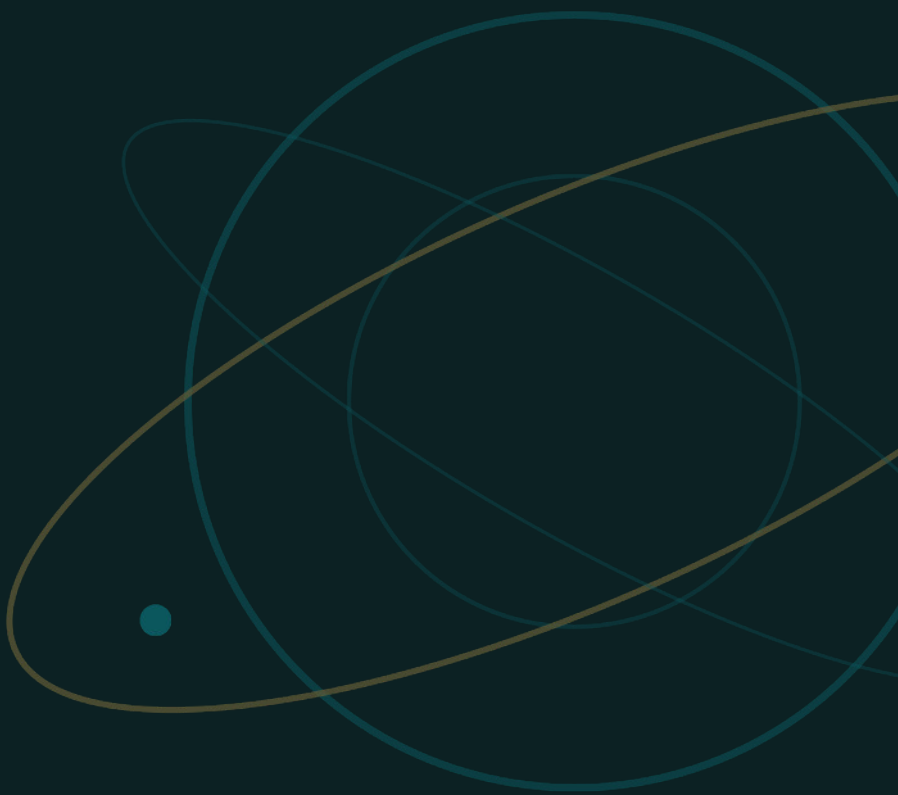




GEO SCAN AUSTRALIA PACIFIC

THE GREEN EXPLORATION COMPANY



GOVERNANCE

Corporate policies

Code of Conduct · Anti-Bribery and Corruption · Work Health and Safety · Environmental and Community · Information Security and Client Data

GeoScan Australia Pacific Pty Ltd (ACN 663 163 933)

Level 38, 71 Eagle Street, Brisbane QLD 4000

Effective 4 October 2026

How we work

GeoScan Australia Pacific works with governments, regulators, mining companies and landowners across Australia, the Pacific and beyond. These five policies set out the standards we hold ourselves, our people and our subcontractors to. They apply in every country we operate in, and they are available to clients and the public at geoscanauspac.com.

01 Code of Conduct

How we behave with clients, partners, communities and each other. Honest technical reporting, no conflicts of interest, respect for people and the law in every country we work in.

02 Anti-Bribery and Corruption Policy

Zero tolerance for bribery in any form, including facilitation payments. Applies to every project, from Australia to Papua New Guinea, Solomon Islands and Vietnam, and to everyone who acts for us.

03 Work Health and Safety Policy

Everyone goes home safe. Risk assessment and journey management for every field program, the authority to stop unsafe work, and compliance with WHS and mine safety law in each jurisdiction.

04 Environmental and Community Policy

The Green Exploration Company. Low-footprint survey methods, respect for customary landowners and Traditional Owners, protection of cultural heritage, and fair local engagement.

05 Information Security and Client Data Policy

Client survey data is treated as commercially sensitive. Access on a need-to-know basis, multi-factor authentication, encryption, controlled sharing with our technology partners, and a tested breach response.

Approval

These policies were approved by the Board of GeoScan Australia Pacific Pty Ltd (ACN 663 163 933) and take effect on 4 October 2026. They will be reviewed by October 2027, or earlier if the law or our operations change.

Brent Thomson, Chairperson and Group Managing Director

Date: _____

Code of Conduct

Entity	GeoScan Australia Pacific Pty Ltd (ACN 663 163 933)
Registered office	Level 38, 71 Eagle Street, Brisbane QLD 4000
Policy owner	Brent Thomson, Chairperson and Group Managing Director
Effective	4 October 2026. Next review October 2027.

Purpose

GeoScan works for governments, regulators, mining companies and landowners whose decisions rest on our data. This Code sets the standard of behaviour that trust depends on. This policy applies to every director, officer, employee and contractor of GeoScan Australia Pacific Pty Ltd (ACN 663 163 933) ("GeoScan", "we"), and to agents, consultants and subcontractors acting for us, in every country where we work.

Our standards

- Act lawfully. Comply with the laws of Australia and of every country we operate in. Where local custom and the law differ, follow the law. Where this Code is stricter than local law, follow this Code.
- Report honestly. Present survey results, interpretations and capability claims accurately, with their limitations stated. Satellite and remote sensing results identify targets and anomalies. We never present them as Mineral Resources or Ore Reserves, and we never overstate depth, accuracy or success rates.
- Avoid conflicts of interest. Declare any personal, financial or family interest that could influence, or appear to influence, a decision you make for GeoScan. Do not hold undisclosed interests in tenements, companies or projects we survey.
- Protect confidential information. Client data, survey results, pricing and partner technology are confidential. Use them only for the purpose they were provided. Do not trade on, or pass on, information about a client's project.
- Treat people with respect. We do not tolerate discrimination, bullying, harassment or sexual harassment. Everyone is entitled to a safe and respectful workplace, in the office and in the field.
- Respect communities and culture. Engage with customary landowners, Traditional Owners and local communities openly and with respect for their rights, customs and cultural heritage.
- Comply with sanctions and export controls. Our technology partners operate under German, European Union and United States law. Do not provide services, data or technology to a sanctioned person or country, and check with the Group Managing Director before any work in a country under sanctions.
- No forced or child labour. We do not use, and will not knowingly work with suppliers who use, forced, bonded or child labour, or any other form of modern slavery.

- Use company assets properly. Equipment, vehicles, systems and funds are for GeoScan business. Keep accurate records of all expenses and transactions.

Gifts, hospitality and political activity

Gifts and hospitality are covered by the Anti-Bribery and Corruption Policy. GeoScan does not make political donations. Any personal political activity must be undertaken in your own name and time, without using GeoScan's name or resources.

Speaking up

Report any actual or suspected breach of this Code to the Group Managing Director, or to the Group Chief Financial Officer if the concern involves the Group Managing Director. Reports can be made in confidence to info@geoscanauspac.com marked "Confidential: Attention Group CFO". We will not tolerate retaliation against anyone who raises a concern in good faith.

Breaches

Breaches of this Code may result in disciplinary action, up to termination of employment or engagement, and may be referred to the relevant authorities.

Anti-Bribery and Corruption Policy

Entity	GeoScan Australia Pacific Pty Ltd (ACN 663 163 933)
Registered office	Level 38, 71 Eagle Street, Brisbane QLD 4000
Policy owner	Brent Thomson, Chairperson and Group Managing Director
Effective	4 October 2026. Next review October 2027.

Purpose

GeoScan has zero tolerance for bribery and corruption. Much of our work is with governments, state agencies and regulators, and some of it is in countries where corruption risk is high. This policy sets out what we will and will not do. This policy applies to every director, officer, employee and contractor of GeoScan Australia Pacific Pty Ltd (ACN 663 163 933) ("GeoScan", "we"), and to agents, consultants and subcontractors acting for us, in every country where we work.

Legal framework

We comply with all applicable anti-bribery laws. These include Division 70 of the Criminal Code Act 1995 (Cth), which makes bribery of a foreign public official an offence and, since September 2025, makes a company liable for failing to prevent foreign bribery by its associates. We also comply with the anti-corruption laws of every country we work in, including Papua New Guinea, Solomon Islands and Vietnam, and with the laws that apply to our German and United States partners.

What is prohibited

- Offering, promising, giving, requesting or accepting a bribe, directly or through a third party. A bribe is anything of value given or received to improperly influence a decision or gain a business advantage. It can be cash, gifts, travel, employment, donations, discounts or favours.
- Facilitation payments. These are small payments to a public official to speed up a routine action such as a permit, visa, customs clearance or licence. Australian law provides a narrow defence for them, but GeoScan prohibits them in all circumstances.
- Payments through agents or intermediaries that we could not make directly.
- Hiding payments or recording them inaccurately in our books.

Duress

If a payment is demanded under threat to someone's life, health or liberty, safety comes first. Make the payment, then report it to the Group Managing Director within 24 hours so it can be recorded accurately and reported where required.

Gifts and hospitality

- Gifts and hospitality must be modest, infrequent, given openly and never intended to influence a decision. Cash and cash equivalents are never acceptable.
- No gift or hospitality may be offered to a public official, or to anyone involved in a current tender or licensing decision, without the prior written approval of the Group Managing Director.
- Any gift or hospitality given or received with a value above AUD 200 must be recorded in the gifts and hospitality register.
- Customary gifts exchanged as part of community or landowner engagement must be reasonable in value, given openly and recorded in the register.

Third parties

- We carry out risk-based due diligence before engaging any agent, consultant, joint venture partner or subcontractor who will deal with public officials for us. This includes checking ownership, reputation and any links to public officials.
- Agreements with these third parties must include anti-bribery obligations, a right to audit and a right to terminate for breach.
- Payments to third parties must match the services provided, be made to an account in the third party's own name, and be supported by invoices.

Community and landowner payments

Payments to landowner groups, community organisations or for local services must be made under a written agreement, to the entity entitled to receive them, and recorded accurately. They must never be made to an individual public official or as a condition of a government decision.

Records

All payments, gifts, hospitality and third-party fees must be recorded accurately and supported by documents. No off-book accounts or undisclosed funds are permitted.

Reporting and breaches

Report any request for, offer of, or suspicion of a bribe immediately, following the speaking up process in the Code of Conduct. Breaches will result in disciplinary action, up to termination, and may be reported to the authorities. No one will be penalised for refusing to pay a bribe, even if GeoScan loses business as a result.

Work Health and Safety Policy

Entity	GeoScan Australia Pacific Pty Ltd (ACN 663 163 933)
Registered office	Level 38, 71 Eagle Street, Brisbane QLD 4000
Policy owner	Brent Thomson, Chairperson and Group Managing Director
Effective	4 October 2026. Next review October 2027.

Commitment

Everyone who works with GeoScan goes home safe. No survey, schedule or contract is worth an injury. This policy applies to every director, officer, employee and contractor of GeoScan Australia Pacific Pty Ltd (ACN 663 163 933) ("GeoScan", "we"), and to agents, consultants and subcontractors acting for us, in every country where we work. It covers office work and all field activity, including ground surveys, drilling programs, site visits and travel.

Legal framework

We comply with the Work Health and Safety Act 2011 (Qld) and the equivalent laws in other Australian states and territories, mine safety legislation that applies at client sites, and the health and safety laws of every country we work in. Where a client's site rules are stricter, we follow the client's rules.

What we do

- Identify hazards and assess risks before every field program, and record the controls in a job safety plan.
- Plan journeys and remote work, including communications, check-in schedules, emergency evacuation and medical support. Remote and overseas programs carry a satellite communication device and a documented emergency response plan.
- Assess security, health and travel risks before work in any new country or region, and follow government travel advice.
- Make sure people are trained, competent, fit for work and equipped with the right personal protective equipment.
- Select subcontractors, including drilling contractors, on their safety performance and systems, and hold them to this policy.
- Consult workers on safety matters and give them the information they need to work safely.
- Report, investigate and learn from every incident and near miss.

Stop work authority

Every person working for or with GeoScan has the authority and the duty to stop work they believe is unsafe. No one will be disciplined for stopping work in good faith.

Fitness for work

No one may work while impaired by alcohol, drugs or fatigue. Client site requirements for drug and alcohol testing apply in full.

Responsibilities

The Group Managing Director is accountable for this policy. Project leads are responsible for job safety plans and site compliance. Every worker is responsible for their own safety and for the safety of others affected by their work.

Reporting

Report all injuries, incidents, near misses and hazards to your project lead immediately and to the Group Managing Director within 24 hours. Notifiable incidents will be reported to the relevant regulator within the required time.

Environmental and Community Policy

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Commitment

GeoScan positions itself as the Green Exploration Company. Our purpose is to give clients certainty before the drill, so that fewer holes are drilled in the wrong places and less ground is disturbed. This aligns with our technology partner GeoScan GmbH's support for the UN Sustainable Development Goals, including clean water and sanitation, affordable and clean energy, and life below water. This policy applies to every director, officer, employee and contractor of GeoScan Australia Pacific Pty Ltd (ACN 663 163 933) ("GeoScan", "we"), and to agents, consultants and subcontractors acting for us, in every country where we work.

Environment

- Use satellite and remote sensing methods first, to reduce ground disturbance in early exploration.
- Comply with all environmental laws, permits and tenement conditions, including the Environmental Protection Act 1994 (Qld) in Queensland and the equivalent laws in other jurisdictions.
- Plan field and drilling programs to minimise clearing, protect waterways and prevent the spread of weeds and pests.
- Manage fuel, chemicals and waste safely, remove all waste from site and rehabilitate disturbed ground.
- Report environmental incidents immediately to the Group Managing Director, the client and, where required, the regulator.

Communities and landowners

- Recognise the rights of Traditional Owners, customary landowners and local communities in the areas where we work.
- Engage before field work begins, explain what we will do in plain language, and respect decisions about access.
- Support the principle of free, prior and informed consent when working on land held under customary tenure.
- Protect cultural heritage. Comply with the Aboriginal Cultural Heritage Act 2003 (Qld) and the Torres Strait Islander Cultural Heritage Act 2003 (Qld) in Queensland, and with heritage laws elsewhere. Stop work and report immediately if a cultural site or artefact is found.

- Employ and buy locally where we can, and pay fairly and on time.
- Provide a clear way for community members to raise concerns, and respond to them.

Human rights and supply chain

We respect human rights in line with the UN Guiding Principles on Business and Human Rights. We do not tolerate modern slavery in our operations or supply chain, and we expect our suppliers and subcontractors to meet the same standard. GeoScan is not currently required to report under the Modern Slavery Act 2018 (Cth), but we apply its principles when selecting and managing suppliers.

Review

We review environmental and community performance at the close of every field program and report lessons to the Group Managing Director.

Information Security and Client Data Policy

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Purpose

Survey areas, tenement boundaries, results and interpretations are commercially sensitive and, for government clients, can be sensitive to national interests. This policy sets out how we protect them. This policy applies to every director, officer, employee and contractor of GeoScan Australia Pacific Pty Ltd (ACN 663 163 933) ("GeoScan", "we"), and to agents, consultants and subcontractors acting for us, in every country where we work. It covers all client data, company data and personal information, in any format.

Classification

- Client Confidential: survey areas, coordinates, tenement data, raw and processed results, interpretations, reports and client correspondence.
- Commercial in Confidence: pricing, proposals, partner agreements and financial records.
- Public: material published on our website or in our company profile.
- Client data is Client Confidential unless the client agrees otherwise in writing.

Controls

- Access to Client Confidential data is limited to people working on that project, and removed when they leave the project or the company.
- Multi-factor authentication is required for email, cloud storage, the website and all business systems.
- Data is encrypted in transit and stored in managed cloud services with encryption at rest. Laptops and phones that hold company data must be encrypted, password protected and able to be wiped remotely.
- Client data is not stored on personal accounts or removable media without approval, and is never entered into public AI tools.
- Software and devices are kept up to date with security patches.

Sharing with technology partners

Survey processing is carried out with our technology partners GeoScan GmbH (Germany) and CC Explorations (United States). We share only the data needed for the survey, under written confidentiality obligations, and we

tell clients where their data will be processed. Where a client requires its data to stay in a particular country or to be handled under specific security requirements, we agree the arrangements in the contract before work starts.

Retention and return

We keep client data for the period agreed in the contract, or otherwise for seven years after project completion, then securely delete it. On request, we return or destroy client data at the end of a project and confirm this in writing.

Personal information

Personal information is handled under our Privacy Policy and the Privacy Act 1988 (Cth). Where the EU General Data Protection Regulation applies, we meet its requirements.

Incidents and breaches

Report any suspected loss, theft or unauthorised access to data to the Group Managing Director immediately. We contain the incident, assess the harm and notify affected clients without delay. Eligible data breaches involving personal information will be notified to the Office of the Australian Information Commissioner and affected individuals under the Notifiable Data Breaches scheme.