

# CODE OF CONDUCT 2025



Updated February 2025

## A MESSAGE FROM THE CEO & MANAGING DIRECTOR



Team,

Welcome to our Code of Conduct.

Whether you are new to Dyno Nobel Limited, or updating yourself on our policies, you must read this Code. Over the coming pages we have set out the behaviours we expect from our people.

No matter what your role is within Dyno Nobel Limited, or as one of our partners, each of us must follow this Code of Conduct.

It is important that each of us lead by example and demonstrate behaviour we should expect from one another, our colleagues and our partners.

This is about living our Company's Values every day at work.

This Code should help you make informed and ethical decisions.

Across Dyno Nobel Limited, we work hard to create a culture of safe ground where we support our people if they speak up. If you see anything that breaches this Code, it is important that you voice your concerns. There are many ways to raise an issue covered in this document.

**Mauro Neves**  
**CEO & Managing Director**



# Our Code of Conduct

The Code of Conduct is Dyno Nobel Limited's (Dyno Nobel) global code of business conduct. It sets out how we work and behave with one another and our stakeholders. Dyno Nobel commits to uphold ethical business practices and to work within the law.

## Who does it apply to?

The Code applies to all directors, officers, and employees of Dyno Nobel. It also applies to each subsidiary, partnership, venture, and business association. This includes agents and contractors who work for Dyno Nobel, or act on our behalf.

## Our expectations

### OUR EMPLOYEES AND CONTRACTORS

- Read this Code to understand what you must do.
- Use this Code, with our Values, to help you make a decision.
- Speak up if you see a breach of this Code.
- Obey applicable laws and policies.

### OUR LINE MANAGERS

- Be a role model with the highest standards of conduct.
- Create safe-ground for people to speak up with questions and concerns.
- Make sure that no one experiences victimisation or retaliation if they speak up.
- Be consistent and hold people accountable to this Code.

### OUR SUPPLIERS AND BUSINESS PARTNERS

- Share our commitment to the ethics and standards in this Code.
- Understand what you must do.
- Obey applicable laws and local procedures.
- Speak up about any improper, illegal, or unethical behaviour.

This Code includes references to our policies and other information. However, it cannot describe every law or duty that may apply to you. We include the relevant Dyno Nobel policies and documents in each section. But you must be familiar with those policies and all applicable laws and duties. Differences can exist between Dyno Nobel policies or other documents (such as compulsory guidelines) and local laws. You must apply the higher or the most strict standard of behaviour.

# Governance

We provide an environment that supports the highest ethical and responsible behaviour by all our people, partners, and businesses. This Code of Conduct will help you understand our expectations and show you how to ask for help if you feel challenged or uncomfortable.

This Code of Conduct sets our standards of behaviour. Therefore, if you do not obey this Code of Conduct, you may face disciplinary action, which can include ending your employment. At all times we will obey local laws and policy.

Our Ethics Committee, ensures a “tone from the top”, promoting ethical behaviour, compliance with laws, and alignment with community expectations, while providing cross-functional guidance on ethical matters.

The Committee will review this Code of Conduct each year and includes:

- the Chief Legal and Corporate Affairs Officer (chair);
- the Chief People Officer;
- the Company Secretary;
- the Vice President of Risk & Insurance;
- the General Manager Sustainability Global; and
- Manager of Internal Audit Global.



# Company Values

We have our Dyno Nobel Values to guide our attitudes, decisions, and actions every day. They are a key part of our Code of Conduct. When our behaviour is consistent with our Values, we develop trust with one another. In your daily work, always act with our Values in mind and think about what we do and how we do it.

**DYNO  
NOBEL®**

**Zero Harm  
for Everyone  
Everywhere**

**Care for the  
Community & our  
Environment**

**Think Customer.  
Everyone.  
Every day.**

**Value people –  
Respect, Recognise  
& Reward**

**Challenge &  
Improve the  
Status Quo**

**Treat the  
Business as  
your Own**

**Deliver  
on our  
Promises**

**Our  
Values**

# Guiding Principles

To help you to decide if your conduct aligns with our standards of behaviour, ask yourself:



Could it cause harm to others, directly or indirectly?



Is it legal? Is it ethical? Does it follow our policies, standards, and procedures?



Does it fit with our Company values?



Will there be any negative results for Dyno Nobel, directly or indirectly?



What would others think of my actions, including my family?



Would I feel comfortable if the media reported my actions?

**If you are uncomfortable with the answers, speak up and ask your Line Manager before you act.**

# Contacts + Resources

Our Dyno Nobel Leadership supports the Code of Conduct and encourage you to speak up if you experience behaviours in conflict with this Code or our Values.

## What are my choices to speak up?

If you feel safe and are comfortable doing so, calmly tell the other person that you object to their behaviour, if they are not aware that it is causing you concern. Otherwise:

- Talk to your Line Manager, or a Line Manager you are comfortable to approach.
- Refer to our Guidelines, Policies, and Procedures for guidance.
- Speak to your Human Resources Business Partner or the regional Legal Team.

Send an email to the Dyno Nobel Ethics Committee mailbox at: [ethical@dynonobel.com](mailto:ethical@dynonobel.com)

Being an Upstander means doing something to help. We want a psychologically safe 'see something, say something' culture to build on our value of 'Zero harm for everyone, everywhere'.

We will not disadvantage a person if they raise a valid concern about a suspected breach of the Code of Conduct, related policies, or local laws.

## Our Whistleblower Protection System

We have set up our Whistleblower Protection System. This will let anyone confidentially report improper, unethical, or illegal conduct and raise concerns about a suspected breach of ethical or legal standards, without fear of victimisation, reprisal, or harassment.

## Our Employee Assistance Program

Our Employee Assistance Program can help you to prepare for the conversation or support you through a difficult or challenging time



# Whistleblower Contacts

Dyno Nobel is committed to a culture of ethical behaviour, good corporate governance and compliance. We strongly encourage reporting of improper, illegal or unethical behaviour.

Our Group Whistleblower Protection Policy ensures that all staff can confidentially report improper, unethical or illegal conduct. You can raise concerns regarding actual or suspected contraventions of ethical or legal standards, without fear of victimisation, reprisal or harassment.

To assist you raise concerns in a confidential and efficient manner, we have established a Whistleblower process with Navex Global.

Navex Global is an externally managed, worldwide, 24/7 service that is multi-lingual and confidential (you can choose to stay anonymous). It's designed to facilitate the resolution of conduct issues that staff feel they are unable to raise and resolve locally.

You can now access the service and report or follow up a concern on your mobile phone or tablet using this QR code:



**In person:**

Speak to your supervisor, manager or Human Resources representative or a Whistleblower Protection Officer as set out in the Policy.

**Online:**

<http://dynonobel.ethicspoint.com>

**Phone lines:**

Australia	1800 743 483 or 1800 452 415
Benin	01 6150 9982
Cameroon	6568 72972
Canada	866 908 7235 or 866 251 0211
Chile	Dial 800 360 312 first. At the prompt, dial 866 251 0211
France	0 800 99 23 60
Indonesia	001 803 1 002 2573
Papua New Guinea	00 086 1198
Singapore	800 852 3055
South Africa	080 001 0727
United States of America	866 908 7235 or 866 251 0211
Mexico	001 844 485 3113
Chile	Dial 800 360 312 first. At the prompt, dial 866 251 0211
Turkey	From an outside line, dial 0811 288 0001. At the English prompt, dial 866 251 0211

You can find more information on [The Hub](#). Use the [Whistleblower System](#) link under the [Dyno Nobel Quicklinks](#) section.

# Employee Assistance Program

We offer our employees a counselling service through the Employee Assistance Program (EAP). This can also be accessed by contractors and immediate family members as well. Counselling can help you to manage conflict, or cope with change. It can help with many types of emotional difficulties. This can include stress, grief, career transitions, relationship issues, gambling, alcohol or substance abuse, parenting conflict, pain, trauma, anxiety, or depression.

For our Asia Pacific employees, you can get support through Converge International website at:

<https://www.convergeinternational.com.au/>

#### Phone numbers (APAC):

**Australia**      **1300 OUR EAP / 1300 687 327** or [www.convergeinternational.com.au](http://www.convergeinternational.com.au)

**Indonesia**      **+6221 29578 187** or <https://www.iradatimprove.com/>

For our Dyno Nobel Americas employees, and your immediate family members, you can get support through the SupportLinc Employee Assistance Program (EAP) at no cost. You can log on to the SupportLinc website at:

<https://www.supportlinc.com/global> and use the **username: dyno**

For our Dyno Nobel Asia Pacific Moranbah Plant employees, and your immediate family members, you can get support through Gryphon Psychology at:

**1800 056 076** or [www.gryphonpsych.com.au](http://www.gryphonpsych.com.au)

#### Phone numbers (Americas):

**United States**      **(888) 881-LINC (5462)**

**Canada**              **(877) 847-4525**

**Chile**                 **800 914 352**

**Mexico**              **(800) 681-1529**

You can find more information on The Hub. Use the EAP – Employee Assistance Program link under the Dyno Nobel Quicklinks section.

# Caring for our People

We are driven by a belief in 'Zero Harm for Everyone, Everywhere'. We value the benefits of a diverse, equitable and inclusive company, which encourages and supports the contribution, ideas and perspectives of all.



## CARING FOR OUR PEOPLE

We believe in 'Zero harm for everyone, everywhere'. We value the benefits of a diverse, equitable and inclusive company, which encourages and supports the contribution, ideas, and perspectives of everyone.

### Health and safety

We commit to 'Zero harm for everyone, everywhere' for our employees, contractors, customers, shareholders, and the community.

Our health and safety management systems follow the relevant laws and industry standards. You must obey our Rules to Live By, and applicable laws and standards. But we support you to stop a job or speak up if you believe something is unsafe.

We share the responsibility for safety and empower, develop, and expect everyone to be leaders in Zero Harm.

We promote and support mental health and employee wellbeing, and we provide access to an Employee Assistance Program.

We operate under all relevant licences and laws.

And we want to be a valued member of the communities in which we operate.

### Workplace equity and inclusion

We value the unique contribution of each person and what we can do with a diverse and inclusive culture. We embrace diversity to recognise, respect, and value the unique qualities and different

characteristics of everyone. These differences can include: gender, ethnicity, cultural background, age, disability, sexual orientation, political opinion, and religious belief. We will challenge our biases and assumptions so we base decisions on skills, experience, and performance.

### Appropriate Workplace Behaviour

We do not tolerate any form of bullying, harassment, discrimination, or intimidation. We provide equal opportunities for everyone. And we do not discriminate when we make employment, compensation, or promotion decisions.

**Remember, harassment does not need to happen in the workplace to be a breach of our Code or policies.**

### Business travel

When you travel, you must make sure that your behaviours follow local laws and are consistent with our Code of Conduct.

When you travel, you must remain vigilant of health, safety, and security risks, and respect the local laws and customs of your travel destination. You must spend company funds correctly to represent Dyno Nobel's reputation positively.



## CARING FOR OUR PEOPLE

### Always

- Obey our health and safety standards and 'Rules to Live By'.
- Stop the job if you believe your safety or the safety of others is at risk.
- Report any event, including incidents, injuries and near misses immediately.
- Make sure that you are fit for work every day and not impaired by lack of sleep, drugs, or alcohol.
- Make sure that you understand the emergency procedures that apply where you work.
- Create a safe work environment for others to speak up, share ideas, and contribute.
- Help to create a work environment that does not have harassment and discrimination.
- Claim only legitimate business expenses.

### Never

- Do work that compromises yours or others safety.
- Start a job unless you are qualified to do the work.
- Expect that someone else will speak up and report a safety issue or risk.
- Engage in any form of harassment, bullying, intimidation or violence.
- Make inappropriate comments of a sexual nature, or act in a sexually offensive manner.
- Treat anyone less favourably because they have made a genuine complaint.
- Travel without appropriate approvals.

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#### TOOLS AND RESOURCES

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[HSEC Management System](#)

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[Rules to Live by](#)

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[Diversity Policy](#)

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[Anti-discrimination & Harassment Policy](#)

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[Recruitment & Selection Policy](#)

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[Group Whistleblower Protection Policy](#)

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[Australian Whistleblower Protection Policy](#)

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# Caring about our Community

We care for the environment and respect the local and Indigenous communities in which we operate. We embrace our responsibility to value people and respect human rights.



## CARING ABOUT OUR COMMUNITY

We care for the environment and respect the local and Indigenous communities in which we operate. We embrace our responsibility to value people and respect human rights.

### Respecting Human Rights

We respect the rights and dignity of our people working throughout our operations. We oppose forced or child labour, slavery, and human trafficking. And we provide good-faith relationships with elected employee representatives.

### Supporting Communities

We want to be a valued member of the communities in which we operate. Building long-term relationships with our communities is fundamental to our social licence to operate. We have an important responsibility to make a positive social and economic contribution.

We respect our neighbouring communities, their values and cultural heritage and consider them in carrying out business operations. Local site management listen to and work with the community to achieve agreeable results.

### Environmental Care

Our operations comply with all relevant environmental laws and licences. We will continually improve our processes and systems to lessen the impact on the environment and promote the efficient use of resources and energy.

You must obey all environmental policies and practices that we use and actively identify and manage environmental risks and impacts.

We respect and protect land of special cultural heritage value on or near our sites.

Where we access and use land, we will minimise disruption to the community and environment. We will rehabilitate unavoidable impacts, and work with local communities and Indigenous Peoples.

### Product stewardship and sustainable procurement

We identify and manage the health, safety, and environmental performance of our products. We do this as we develop, manufacture, distribute, market, use and dispose of products. We consider the health, safety, and environmental impact of our products, packaging and services. This is part of our commitment to manage those impacts responsibly and ethically throughout the product life-cycle.

### Engaging with Indigenous peoples

We acknowledge and value the rights, knowledge, and interests of Indigenous, First Nation and Native Peoples in all the lands that we operate. We continue to build our relationships with Indigenous Peoples. We work side-by-side to create mutually beneficial outcomes and opportunities for future generations.

We create opportunities to improve access to employment and education and training in the communities in which we operate. We are on a journey and work with our Indigenous communities to improve our understanding of Indigenous histories and cultures.

We invite and encourage all employees, contractors, suppliers, and customers to actively take part in this journey.



## CARING ABOUT OUR COMMUNITY

### Always

- Assess the risks before you start work to minimise environmental and community impacts.
- Play your part in caring for the environment and minimising environmental impacts.
- Obey environmental laws.
- Respond to and report any environmental incident.
- Embrace our differences and actively learn about the cultures in which we work, always treating others with respect.
- Speak to your Line Manager before you speak with representatives of community organisations.
- Report any human rights concerns, including inhumane treatment.

### Never

- Do work that could knowingly result in an environmental or community incident.
- Expect that someone else will report an environmental issue or concern.
- Organise or take part in an activity that could be disrespectful to the local community.
- Disregard cultural sensitivity and our community and local heritage obligations.
- Favour or provide financial contributions to community groups (political, government or religious), without permission.




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#### TOOLS AND RESOURCES

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[Modern Slavery Policy](#)

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[Reconciliation Action Plan](#)

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[Sustainable Communities Policy](#)

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[Australian Indigenous Relations Policy](#)

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[Human Rights Policy](#)

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# Working with others

We build trusted relationships with our suppliers and business partners through our reputation, governance, and commitment to the highest standards. Our personal and business interests never compromise our ability to make objective and responsible decisions.



## WORKING WITH OTHERS

We build trusted relationships with our suppliers and business partners through our reputation, governance, and commitment to the highest standards. Our personal and business interests never compromise our ability to make objective and responsible decisions.

### Working with Governments

You must conduct yourself according to the highest ethical standards in your dealings with governments. This includes their agencies and representatives, in national and local jurisdictions around the world.

We take part in public policy debate to develop public policy relevant to our businesses, and to follow all applicable laws. As an individual, you have the right to engage in lawful political activities in your own time and make political contributions. However, you must not do so as a representative of Dyno Nobel.

### Anti-corruption and Bribery

We do not tolerate bribery and corruption in any form. You must not make unlawful or improper payments or give anything of value or improper advantage, to any individual or entity, to gain a business advantage for us. Corruption or bribery will result in civil or criminal fines and penalties.

We uphold a culture of honesty and integrity. We reinforced this through effective internal controls.

### Supplier Relationships and Conflicts of Interest

Our suppliers are critical for us to do business and meet the expectations of our stakeholders. We want to work with suppliers who share our commitment to ethical and responsible business practices.

When you work and interact with our suppliers, you must communicate relevant supplier-related requirements and report any signs that a supplier may not meet their contract or this Code.

Avoid any situation which could involve a conflict between your personal interests and the interests of Dyno Nobel. You must report any potential conflict.

A conflict of interest can occur when your interests or activities affect your ability to make an objective decision for Dyno Nobel. A conflict of interest can occur in many ways:

- A business interest with a supplier, customer, or competitor.
- A business relationship for Dyno Nobel with a relative or friend.
- You accept a personal benefit from a potential supplier or business partner.

You must not give or receive any gift or entertainment which could influence a business decision or conduct. If you have any doubts about whether to accept a gift or entertainment, ask your Line Manager. Also, you must not offer, promise, or give a payment, gift, or entertainment to or for the benefit of a third party as consideration for performing, or avoiding completing, a transaction.

If in doubt whether a conflict of interest exists, speak to your Line Manager.

### Competition and Trade Controls

When we do business, we believe in fair competition. You must follow the competition and anti-trust laws of the countries in which we operate so that we can carry out our business ethically and do not enter inappropriate conversations or agreements with our competitors. You must be clear, concise, and fair when you deal with our customers, suppliers and service providers.

We are a global company, so we must follow all applicable trade compliance laws. You must not make a payment or engage in a transaction that is in breach of any sanctions law which applies to Dyno Nobel or its subsidiaries.

## WORKING WITH OTHERS

### Always

- Report any signs that a supplier or business partner is not complying with their contract or this Code.
- Avoid situations that could involve a conflict of interest.
- Report any actual, potential, or perceived conflict of interest.
- Follow our procurement policies and processes when you deal with our suppliers.
- Act fairly in our dealings with customers and suppliers.

### Never

- Engage in political activity or donate on behalf of Dyno Nobel.
- Take advantage of your position or access to information gained through your employment.
- Accept or provide a gift or entertainment in return for favourable business treatment or advantage.
- Offer or accept bribes, kickbacks, or facilitation payments.
- Use company property, supplies, or funds for political activities.
- Engage in any form of anti-competitive conduct, including fixing prices, bid rigging or restricting supply.

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#### TOOLS AND RESOURCES

[Global Contractor Policy](#)

[Procurement Policies](#)

[Group Anti-Bribery Policy](#)

[Group Sanctions Policy](#)

[Gifts and Entertainment Policy](#)

[Global Conflicts of Interest Policy](#)

[Continuous Disclosure Policy](#)



# Information

We value our personal and corporate security, to protect our assets, technology, and information. When we handle commercially sensitive and proprietary information, we behave ethically and responsibly.



## SHARING INFORMATION

We value our personal and corporate security, to protect our assets, technology, and information. When we handle commercially sensitive and proprietary information, we behave ethically and responsibly.

### Protecting our Assets

We must protect and take care of our assets and resources. Company assets include many different forms such as property, equipment, computers, IT systems, strategic plans, research, and technical data. If you need to access confidential information, resources, or systems as part of your role, you must do so in a correct and responsible way. You must only use Dyno Nobel property and financial resources for legitimate business purposes.

### Cyber Security

We are all responsible for safeguarding our technology, systems, and data. You must use all proper means to keep the integrity of our systems. This can include updating software and hardware, changing passwords, checking the system performance and preventing unauthorised access. You must store information correctly to keep vital information confidential and secure. Inappropriate use of technology or data may expose us to risks, including viruses, security breaches, theft or loss of property or damage to our reputation.

### Truthful Reporting

When we report about our business and performance, we are open and honest. Our leaders, investors, customers, suppliers, and community rely on accurate information and reporting to make decisions.

We keep internal accounting controls. We make and keep records which accurately and fairly reflect the parties, payment arrangements and purpose of all transactions. Our accounting controls provide reasonable assurance that we record transactions to allow us to prepare accurate financial statements and to preserve accountability of assets.

### Intellectual property – Patents and Copyright Protection

The technology of the Group, and proprietary corporate and product names and publications, make up our valuable intellectual property rights. We must make sure that we develop, protect, and exploit intellectual property in the best interests of our Company.





## SHARING INFORMATION

### Always

- Use confidential information, resources, and information systems in a correct and responsible way.
- Open email attachments only from trusted contacts and businesses.
- Store information correctly and make sure your usernames and passwords are secure.
- Be vigilant of cyber-attacks or scams and report any incidents.
- Keep accurate and complete information and records.
- Protect our intellectual property and respect the intellectual property of others, such as our suppliers, customers, and competitors.

### Never

- Use our property or financial resources for personal benefit.
- Remove, change, or destroy property without proper authorisation, this includes all electronic resources.
- Let someone else to use your computer or operating system with your username or password.
- Copy protected material without permission or share confidential information with others.
- Hide or falsely record prohibited payments or activities.

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#### TOOLS AND RESOURCES

[Significant Accounting Policies](#)

[Accounting Approval Framework Policy](#)

[Privacy Policy](#)

[Privacy, Employee Records & Documentation Guidelines](#)

[Shareholder Communications Policy](#)

[Group Media Management Policy](#)

# Protecting our Company

Make sure that your personal and business interests never interfere with your ability to make sound and objective decisions. We disclose information in an accurate and timely way, and respect and safeguard personal data.



## PROTECTING OUR COMPANY

Make sure that your personal and business interests never interfere with your ability to make sound and objective decisions. We disclose information in an accurate and timely way, and respect and safeguard personal data.

### Communicating Externally

When we communicate externally, our communications are accurate, consistent, and responsible. Only approved people can talk to the media and our investment community and communicate with external parties.

Our on-line presence can have outcomes that may result in damage to our reputation. When you interact on-line and on social media, keep a proper balance between your right to express a personal opinion and our business interests. In all on-line activity, you must follow local laws and confidentiality requirements and all laws about defamation, discrimination, and bullying.

We present company announcements in a factual, clear, and balanced way so all shareholders have equal and timely access to material information. We do this to promote investor confidence and the rights of shareholders.

### Personal Information and Privacy

At Dyno Nobel, we respect the privacy rights of our employees, customers, suppliers, and business partners. We obey data privacy laws and we only collect, access, use or disclose personal data when necessary for legitimate business purposes.

Personal data can include information about you such as your name, contact details, race or ethnic origin, health data or union membership.

If your role responsibilities include handling such information, you must take the necessary steps to protect it. Do not share private information with anyone, including your co-workers, unless they have a business need to know it and you have the authority to share it.

### Insider Trading

In your role you may become aware of information that is not publicly available, that may be market sensitive, or could influence investment decisions.

You must not buy or sell the shares, directly or indirectly, or other securities of any company, including Dyno Nobel, when you have unpublished information which could affect the value of those securities.

You will face disciplinary action, and potential civil or criminal penalties, if you break insider trading laws.

## PROTECTING OUR COMPANY

### Always

- Act with honesty, integrity, and transparency.
- Exercise good judgement when you post on social media and avoid any activity that could result in damage to our reputation.
- Only collect, use, or keep personal data for defined, legitimate purposes.
- Ask your Line Manager if you are unsure if you should share personal data with a third party.
- Make sure that you have approval before you share presentations or company information externally.

### Never

- Buy or sell any Dyno Nobel securities if you have inside information.
- Share information or spread false information that could influence the price of securities or the investment decisions of others, including family and friends.
- Communicate with the media, either directly or indirectly, about our business, unless you have approval to do so.
- Make a payment or engage in any transaction that is in breach of a sanction or law which applies to Dyno Nobel or its subsidiaries.

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### TOOLS AND RESOURCES

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[Group Social and Digital Media Policy](#)

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[Group Anti-Bribery Policy](#)

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[Fraud & Corruption Prevention Policy](#)

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[Securities Trading Policy](#)



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NOBEL®