



## IREN LIMITED

# Code of Business Conduct and Ethics

(As of December 3, 2024)

## 1 Introduction

### 1.1 Purpose

This Code of Business Conduct and Ethics (the “**Code**”) contains general guidelines for conducting the business of IREN Limited and its subsidiaries (the “**Company**” or “**we**”) consistent with the highest standards of business ethics. To the extent this Code requires a higher standard than required by commercial practice or applicable laws, rules or regulations, the Company adheres to these higher standards.

This Code applies to all of our directors, officers and other employees of the Company. We refer to all officers and other employees covered by this Code as “Company employees” or simply “employees,” unless the context otherwise requires. In this Code, we refer to our principal executive officer, principal financial officer, principal accounting officer and controller, or persons performing similar functions, as our “principal financial officers.” This Code is not intended to cover every issue that may arise and may be supplemented by other policies that may be adopted by the Company from time to time.

### 1.2 Seeking Help and Information

This Code is not intended to be a comprehensive rulebook and cannot address every situation that you may face. If you feel uncomfortable about a situation or have any doubts about whether it is consistent with the Company’s ethical standards, seek help. We encourage you to contact your manager for help first. If your manager cannot answer your question or if you do not feel comfortable contacting your manager, contact the Chief Legal Officer or the Ethics Hotline (see paragraph 1.3 for details).

### 1.3 Reporting Violations of the Code

All employees and directors have a duty to report any known or suspected violation of this Code, including violations of the laws, rules, regulations or policies that apply to the Company. If you know of or suspect a violation of this Code, promptly report the conduct to (1) the Chief Legal Officer at [breachreporting@iren.com](mailto:breachreporting@iren.com) or (2) the persons identified in the *Policies and Procedures Regarding Complaints and Whistle-Blowing Protection* if that policy applies. . You may also anonymously report known or suspected violations of the Code on the Ethics Hotline that is available 24 hours a day, 7 days a week, by telephone at +1 888-586-1068 or on the Internet at <https://www.whistleblowerservices.com/IREN>.

It is Company policy that any employee or director who violates this Code will be subject to appropriate discipline, which may include, for an employee, termination of employment or, for a director, a request that such director resign from the Board of Directors of the Company (the “**Board of Directors**”). This determination will be based upon the facts and circumstances of each particular situation. If you are accused of violating this Code, you will be given an opportunity to present your version of the events at issue prior to any determination of appropriate discipline. Employees and directors who violate the law or this Code may expose themselves to substantial civil damages, criminal fines and prison terms. The Company may also face substantial fines and penalties and may incur damage to its reputation and standing in the community. Your conduct as a representative of the Company, if it does not comply with the law or with this Code, can result in serious consequences for both you and the Company.

## 1.4 Policy Against Retaliation

The Company encourages employees and directors to report evidence of known or suspected violations of this Code or the laws, rules, regulations or policies that apply to the Company and prohibits retaliation against an employee or director who, in good faith, seeks help or reports known or suspected violations. Where you have reasonable grounds to suspect misconduct or an improper state of affairs or circumstances, you may also be protected under whistleblower provisions (see *Policies and Procedures Regarding Complaints and Whistle-blowing Protection*).

## 1.5 Waivers of the Code

To the extent allowed by applicable laws, parts of this Code may be waived from time to time. Any waiver of this Code for our directors, executive officers or other principal financial officers may be made only by our Board of Directors (following a recommendation by the Audit and Risk Committee) and will be disclosed to the public as required by law or the rules of The Nasdaq Stock Market LLC, when applicable. Waivers of this Code for other employees may be made only by our Chief Executive Officer(s) and will be reported to our Audit and Risk Committee.

## 1.6 Review

The Board of Directors shall review this Code at least annually and make changes as appropriate.

# 2 Conflict of Interest

## 2.1 Identifying Potential Conflicts of Interest

A conflict of interest can occur when an individual's private interest interferes in any way, or even appears to interfere, with the interests of the Company as a whole. You should avoid any private interest that influences your ability to act in the interests of the Company or that makes it difficult to perform your work objectively and effectively.

Identifying potential conflicts of interest may not always be clear-cut. The following situations might reasonably be expected to give rise to a conflict of interest and should be identified to, and addressed by, the Chief Legal Officer or the chair of the Audit and Risk Committee:

**Outside Employment.** An employee being employed by, serving as a director of, or providing any services to a company that the individual knows or suspects is a material customer, supplier or competitor of the Company (other than services to be provided as part of an employee's job responsibilities for the Company).

**Improper Personal Benefits.** An employee or director obtaining any material (as to him or her) personal benefits or favors because of his or her position with the Company. Please see "Gifts, Entertainment and Hospitality" below for additional guidelines in this area.

**Financial Interests.** An employee having a "material interest" (ownership or otherwise) in any company that the individual knows or suspects is a material customer, supplier or competitor of the Company and using his or her position to influence a transaction with such company. Whether an employee has a "material interest" will be determined by the Chief Legal Officer or the Audit and Risk Committee, as applicable, in light of all of the circumstances, including consideration of the relationship of the employee to the customer, supplier or competitor, the relationship of the employee to the specific transaction and the importance of the interest to the employee having the interest.

**Loans or Other Financial Transactions.** An employee or director obtaining loans or guarantees of personal obligations from, or entering into any other personal financial transaction with, any company that the individual knows or suspects is a material customer, supplier or competitor of the Company. This guideline does not prohibit arms-length transactions with banks, brokerage firms or other financial institutions.

**Service on Boards and Committees.** An employee or director serving on a board of directors or trustees or on a committee of any entity (whether profit or not-for-profit) whose interests reasonably would be expected to conflict with those of the Company.

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**Actions of Family Members.** The actions of family members outside the workplace may also give rise to the conflicts of interest described above because they may influence an employee's or director's objectivity in making decisions on behalf of the Company. For purposes of this Code, "family members" include your spouse or life-partner, brothers, sisters, parents, in-laws and children whether such relationships are by blood or adoption.

For purposes of this Code, a company is a "material" customer if the customer has made payments to the Company in the past year in excess of \$200,000 or 5% of the Company's gross revenues, whichever is greater. A company is a "material" supplier if the supplier has received payments from the Company in the past year in excess of \$200,000 or 5% of the supplier's gross revenues, whichever is greater. If you are uncertain whether a particular company is a material customer or supplier, please contact the Chief Legal Officer for assistance.

## 2.2 Disclosure of Conflicts of Interest

The Company requires that employees and directors disclose any situation that reasonably would be expected to give rise to a conflict of interest. If you suspect that you have a situation that could give rise to a conflict of interest, or something that others could reasonably perceive as a conflict of interest, you must report it in writing to the Chief Legal Officer, or if you are a director, executive officer or other principal financial officer, to the chair of the Audit and Risk Committee. The Chief Legal Officer or the Audit and Risk Committee, as applicable, will work with you to determine whether you have a conflict of interest and, if so, how best to address it. All transactions that would give rise to a conflict of interest involving a director, executive officer or principal financial officer must be approved by the Board of Directors (following a recommendation by the Audit and Risk Committee), and any such approval will not be considered a waiver of this Code.

## 3 Corporate Opportunities

As an employee or director of the Company, you have an obligation to advance the Company's interests when the opportunity to do so arises. If you discover or are presented with a business opportunity through the use of corporate property or information or because of your position with the Company, you should first present the business opportunity to the Company before pursuing the opportunity in your individual capacity. No employee or director may use corporate property, information or his or her position with the Company for personal gain while employed by us or, for a director, while serving on our Board of Directors.

You should disclose to your manager the terms and conditions of each business opportunity covered by this Code that you wish to pursue. Your manager will contact the Chief Legal Officer and the appropriate management personnel to determine whether the Company wishes to pursue the business opportunity. If the Company waives its right to pursue the business opportunity, you may pursue the business opportunity on the same terms and conditions as originally proposed and consistent with the other ethical guidelines set forth in this Code.

## 4 Confidential Information

Employees and directors have access to a variety of confidential information regarding the Company. Confidential information includes all non-public information that might be of use to competitors, or, if disclosed, harmful to the Company or its collaborators, customers or suppliers. Employees and directors have a duty to safeguard all confidential information of the Company or third parties with which the Company conducts business, except when disclosure is authorized or legally mandated. Unauthorized disclosure of any confidential information is prohibited.

Additionally, employees and directors should take appropriate precautions to ensure that confidential or sensitive business information, whether it is proprietary to the Company or another company, is not communicated within the Company except to employees who have a need to know such information to perform their responsibilities for the Company. An employee's and director's obligation to protect confidential information continues after he or she leaves the Company. Unauthorized disclosure of confidential information could cause competitive harm to the Company or its collaborators, customers or suppliers and could result in legal liability to you and the Company.

Any questions or concerns regarding whether disclosure of Company information is legally mandated should be promptly referred to the Chief Legal Officer.

## 5 Competition and Fair Dealing

All employees should endeavor to deal fairly with fellow employees and with the Company's collaborators, licensors, customers, suppliers and competitors. Employees should not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair-dealing practice. Employees should maintain and protect any intellectual property licensed from licensors with the same care as they employ with regard to Company-developed intellectual property. Employees should also handle the non-public information of our collaborators, licensors, suppliers and customers responsibly and in accordance with our agreements with them, including information regarding their technology, products and product pipelines. Failure to comply with applicable laws, rules and regulations may result in disciplinary action by the Company and/or civil or criminal liability.

## 6 Gifts, Entertainment and Hospitality

The giving and receiving of gifts is a common business practice. Appropriate business gifts and entertainment are welcome courtesies designed to build relationships and understanding among business partners. Gifts, entertainment and hospitality, however, should not compromise, or appear to compromise, your ability to make objective and fair business decisions. In addition, it is important to note that the giving and receiving of gifts are subject to a variety of laws, rules and regulations applicable to the Company's operations. These include, without limitation, laws covering the marketing of products, bribery and kickbacks. You are expected to (1) understand and comply with all laws, rules and regulations that apply to your job position and (2) comply with any policies or procedures of the Company in relation to gifts and entertainment.

If you conduct business in other countries, you must be particularly careful that gifts and entertainment are not construed as bribes, kickbacks or other improper payments. See the "Anti-Corruption Compliance" section of this Code for a more detailed discussion of our policies regarding giving or receiving gifts related to business transactions in other countries.

For a more detailed discussion of special considerations applicable to dealing with federal, state and local governments in the U.S., Canada and Australia, see "Interactions with the Government."

## 7 Environment, Social and Governance

The Company's *Environment, Social and Governance Policy* sets out a framework for the way in which the Company will consider environmental, social and governance factors in the day to day running of its business.

## 8 Modern Slavery

### 8.1 Definitions

"Modern slavery" describes situations where coercion, threats or deception are used to exploit victims, or to undermine or deprive them of their freedom. Modern slavery is an umbrella term used to describe serious exploitation, including trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour services, and the worst forms of child labour. While it does not include practices like substandard working conditions or underpayment of workers, these practices are also illegal and harmful and may be present in some situations of modern slavery.

### 8.2 Our Commitment

The Company is committed to minimizing the risk of modern slavery in our operations and supply chains. All businesses, including ours, have a role to play in fostering ethical business practices that help to prevent modern slavery.



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As an employer, we are committed to providing a safe workplace, where all employees are treated with respect and dignity. We oppose all forms of slavery, forced or compulsory labour and child labour, both within our business and within our supply chains.

As a purchaser of goods and services, we seek to engage suppliers that can, and do, comply with our Supplier Code of Conduct or their own comparable policies. We expect our suppliers to have in place, and implement, adequate policies, controls designed to prevent, detect, assess and manage modern slavery risks in their operations and supply chains. As part of our annual modern slavery reporting obligations, we undertake due diligence to assess modern slavery risks within our operations and supply chains, and where appropriate, we commit to remediate actual or potential modern slavery.

## 8.3 Your role

Employees have an important role to play as the Company's first line of defence, particularly when making procurement decisions on behalf of the Company and maintaining awareness and vigilance of the red flags for modern slavery both within our workforce and in our supply chains. Therefore, all employees must comply with any procurement policies as updated from time to time.

Everyone is expected to report known or suspected violations of applicable laws, regulations, policies and our ethical standards, including any suspected cases of modern slavery (see paragraph 1.3 for details on how to report).

## 9 Company Records

Accurate and reliable records are crucial to our business. Our records are the basis of our earnings statements, financial reports, regulatory submissions and many other aspects of our business and guide our business decision-making and strategic planning. Company records include financial records, personnel records, and all other records maintained in the ordinary course of our business.

All Company records must be complete, accurate and reliable in all material respects. Each employee and director must follow any formal document retention policy of the Company with respect to Company records within such employee's or director's control. Please contact your manager or the Chief Legal Officer to obtain a copy of any such policy or with any questions concerning any such policy.

## 10 Protection and Use of Company Assets

Employees should protect the Company's assets and ensure their efficient use for legitimate business purposes only and not for any personal benefit or the personal benefit of anyone else. Theft, carelessness and waste have a direct impact on the Company's financial performance. The use of Company funds or assets, whether or not for personal gain, for any unlawful or improper purpose is prohibited.

Employees should be aware that Company property includes all data and communications transmitted or received to or by, or contained in, the Company's electronic or telephonic systems. Company property also includes all written communications. Employees and other users of this property should have no expectation of privacy with respect to these communications and data. To the extent permitted by law, the Company has the ability, and reserves the right, to monitor all electronic and telephonic communication.

## 11 Accuracy of Financial Reports and Other Public Communications

As a public company we are subject to various securities laws, regulations and reporting obligations. U.S. and Australian law, stock exchange rules and our policies require the disclosure of accurate and complete information regarding the Company's business, financial condition and results of operations. Inaccurate, incomplete or untimely reporting will not be tolerated and can severely damage the Company and result in legal liability.

The Company's principal financial officers and other employees working in the finance department have a special responsibility to ensure that all of our financial disclosures are full, fair, accurate, timely and understandable.

These employees must understand and strictly comply with international financial reporting standards and standards, laws and regulations for accounting and financial reporting of transactions, estimates and forecasts.

## 12 Compliance with Laws, Regulations and Policies

Each employee and director has an obligation to comply with all laws, rules and regulations applicable to the Company's operations. These include, without limitation, laws covering bribery and kickbacks, copyrights, trademarks and trade secrets, information privacy, insider trading, illegal political contributions, antitrust prohibitions, foreign corrupt practices, offering or receiving gratuities, environmental hazards, employment discrimination or harassment, occupational health and safety, false or misleading financial information or misuse of corporate assets. You are expected to understand and comply with all laws, rules and regulations that apply to your job position. If any doubt exists about whether a course of action is lawful, you should seek advice from your manager or the Chief Legal Officer.

All employees shall comply with this Code and all Company policies that apply to them, including, without limitation, the *Insider Trading Compliance Policy*, *Guidelines for Corporate Disclosure* and the *Policies and Procedures Regarding Complaints and Whistle-blowing Protection*.

### 12.1 Interactions with the Government

The Company may conduct business with the U.S., Canadian and Australian governments, state and local governments and the governments of other countries. The Company is committed to conducting its business with all governments and their representatives with the highest standards of business ethics and in compliance with all applicable laws and regulations, including any special requirements that apply to communications with governmental bodies that may have regulatory authority over our products and operations, such as government contracts and government transactions.

If your job responsibilities include interacting with the government, you are expected to understand and comply with the special laws, rules and regulations that apply to your job position as well as with any applicable standard operating procedures that the Company has implemented. If any doubt exists about whether a course of action is lawful, you should seek advice immediately from the Chief Legal Officer.

In addition to the above, you must obtain approval from the Chief Legal Officer for any work activity that requires communication with any member or employee of a legislative body or with any government official or employee. Work activities covered by this policy include meetings with legislators or members of their staffs or with senior executive branch officials on behalf of the Company. Preparation, research and other background activities that are done in support of lobbying communication are also covered by this policy even if the communication ultimately is not made. If any doubt exists about whether a given work activity would be considered covered by this provision, you should seek advice immediately from the Chief Legal Officer.

### 12.2 Political Contributions and Volunteer Activities

The Company encourages its employees and directors to participate in the political process as individuals and on their own time. However, contribution and lobbying laws in the U.S. and Australia severely limit the contributions the Company can make to political parties or candidates. It is Company policy that Company funds or assets are not to be used to make a political contribution to any political party or candidate, unless prior approval has been given by our Chief Executive Officer(s) or Chief Legal Officer. The Company will not reimburse you for personal political contributions. Lobbying activities with federal and state governments in Australia, including communications and donations, are subject to legal requirements including mandatory registration on lobbyist registers and compliance with codes of conduct, and will require prior approval by our Chief Executive Officer(s) and the Chief Legal Officer. When you participate in non-Company political affairs, you should be careful to make it clear that your views and actions are your own, and not made on behalf of the Company. Please contact the Chief Legal Officer if you have any questions about this policy.

## 12.3 Compliance with Antitrust Laws

Antitrust or competition laws of the United States, Canada, Australia and other countries are designed to protect consumers and competitors against unfair business practices and to promote and preserve competition. Our policy is to compete vigorously and ethically while complying with all antitrust, monopoly, competition or cartel laws in all countries, states or localities in which the Company conducts business.

Employees must not engage in prohibited business practices that limit competition, including sharing competitive sensitive information (such as pricing, sales reports, trade secrets, sales markets, and supplier information) with a competitor, gaining or attempting to gain non-public information from actual or potential new hires, engaging in fraud or deception to gather competitive information, discussing or agreeing with a competitor about how we will compete (or not compete) with one another (you must not reach an agreement with any competitor about the price that any party will buy or supply goods or services; the customers or territories each will supply; limiting any production, capacity, supply or acquisition; or responses to tenders) or engaging in anti-competitive or unfair dealings with our customers or suppliers (such as excessive or predatory pricing, or in certain circumstances, refusing to deal or imposing restrictive terms or conditions on our customers or suppliers which limits competition).

Violations of antitrust laws may result in severe penalties against the Company and its employees, including potentially substantial fines and criminal sanctions. You are expected to maintain basic familiarity with the antitrust principles applicable to your activities, and you should consult the Chief Legal Officer with any questions you may have concerning compliance with these laws.

### Meetings with Competitors

Employees should exercise caution in meetings with competitors. Any meeting with a competitor may give rise to the appearance of impropriety. As a result, if you are required to meet with a competitor for any reason, you should obtain the prior approval of the Chief Legal Officer. You should only try to meet with competitors if the meeting has a legitimate business purpose and in a closely monitored, controlled environment for a limited period of time. You should create and circulate agendas in advance of any such meetings, and the contents of your meeting should be fully documented.

### Professional Organizations and Trade Associations

Employees should be cautious when attending meetings of professional organizations and trade associations at which competitors are present. Attending meetings of professional organizations and trade associations is both legal and proper, if such meetings have a legitimate business purpose and are conducted in an open fashion, adhering to a proper agenda. At such meetings, you must not discuss the Company's pricing policies or other competitive terms or any other proprietary, competitively sensitive information. If there is any such discussion, you must immediately state that you cannot have these discussions and exit the meeting and inform the Chief Legal Officer. Also, ensure that your departure (and the reason for it) is clearly documented.

## 12.4 Compliance with Insider Trading Laws

Consistent with the Company's *Insider Trading Compliance Policy*, the Company's employees and directors are prohibited from trading in the stock or other securities of the Company while in possession of material non-public information about the Company. You are required to read carefully and observe our *Insider Trading Compliance Policy*, as amended from time to time. Please contact the Chief Legal Officer with any questions you may have about insider trading laws.

# 13 Public Communications and Regulation FD

## 13.1 Public Communications Generally

The Company places a high value on its credibility and reputation in the community. What is written or said about the Company in the news media and investment community directly impacts our reputation, positively or negatively. Our policy is to provide timely, accurate and complete information in response to public requests (from media, analysts, etc.), consistent with our obligations to maintain the confidentiality of competitive and proprietary information and to prevent selective disclosure of market-sensitive financial data. The Company has adopted separate *Guidelines for Corporate Disclosure* to maintain the Company's credibility and reputation in the community, to maintain the confidentiality of competitive and proprietary information and to prevent selective disclosure of market-sensitive financial data.

## 13.2 Compliance with Regulation FD

While not required as a foreign private issuer under U.S. securities laws, in connection with its public communications, the Company complies with a rule under the U.S. federal securities laws referred to as Regulation FD (which stands for “fair disclosure”). Regulation FD provides that, when we disclose material non-public information about the Company to securities market professionals or stockholders (where it is reasonably foreseeable that the stockholders will trade on the information), we must also disclose the information to the public. “Securities market professionals” generally include analysts, institutional investors and other investment advisors.

The Company has designated certain individuals as “spokespersons” who are responsible for communicating with analysts, institutional investors and representatives of the media. Any employee or director who is not a designated spokesperson of the Company should not communicate any information about the Company to analysts, institutional investors or representatives of the media, except at the request of the Chief Executive Officer(s) or the principal financial and accounting officer.

For more information on the Company’s policies and procedures regarding public communications and Regulation FD, please contact the Chief Legal Officer for a copy of the Company’s *Guidelines for Corporate Disclosure* or with any questions you may have about disclosure matters.

## 14 Anti-corruption Compliance

The Company prohibits bribery and corruption in all of their forms.

The Company is committed to complying with the U.S. Foreign Corrupt Practices Act (the “**FCPA**”), the foreign bribery provisions of the Australian Criminal Code Act 1995 (Cth) (the “**Criminal Code**”) and other applicable anti-corruption laws. The FCPA prohibits the Company and its employees, directors, officers, and agents from offering, giving, or promising money or any other item of value, directly or indirectly, to win or retain business or to influence any act or decision of any government official, political party, candidate for political office, or official of a public international organization.

The Criminal Code prohibits the provision, offer or promise of providing a benefit to another person (or causing such a benefit to be provided, offered or promised with the intention of improperly influencing a foreign public official to obtain or retain business or a business advantage.

The Company prohibits employees, directors, officers, agents, contractors and service providers acting on its behalf, or for the profit or gain of the Company, from giving or receiving bribes, kickbacks, or other inducements to foreign officials. Indirect payments include any transfer of money or other item of value to another individual or organization where the person making the transfer knows or has reason to know that some or all of that transfer is for the benefit of an individual to whom direct payments are prohibited. The use of agents for the payment of bribes, kickbacks or other inducements is expressly prohibited. Violation of the FCPA, the Criminal Code and other applicable anti-corruption laws is a crime that can result in severe fines and criminal penalties, as well as disciplinary action by the Company, up to and including, for an employee, termination of employment or, for a director, a request that such director resign from the Board of Directors.

## 15 International Trade Laws

Company employees and agents must know and comply with U.S. and Australian laws and regulations that govern international operations, as well the local laws of countries where the Company operates. The United States, Australia and many other countries have laws that restrict or otherwise require licensing for the export or import of certain goods and services to other countries or to certain parties. If you are involved with importing, you need to be aware of the applicable governmental regulations and requirements, including those required by the Customs- Trade Partnership Against Terrorism (C-TPAT). A failure to comply can result in fines, penalties, imprisonment and/or a loss of import privileges. U.S. and Australian laws and regulations also impose various trade sanctions or embargoes against other countries or persons and may prohibit cooperation with certain boycotts imposed by some countries against others. The Company does not participate in prohibited boycotts.



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The scope of these licensing requirements, trade sanctions, and trade embargoes may vary from country to country. They may range from specific prohibitions on trade of a given item to a total prohibition of all commercial transactions. It is important to note that the Company may not facilitate or encourage a non-domestic company to perform a transaction that it could not perform itself pursuant to sanctions laws.

Employees involved in export transactions or international operations must familiarize themselves with the list of countries against which the United States and Australia maintain comprehensive sanctions and the rules relating to exporting to or transacting with such countries, either directly or indirectly through foreign subsidiaries or other third parties. In addition, the Company must comply with counter-terrorism requirements when engaging in international trade. Due to the complexities of these international trade laws, contact the Chief Legal Officer before exporting or importing goods or services, or engaging in transactions with countries or persons that may be affected by economic or trade sanctions. If requested to participate in or cooperate with an international boycott that the United States or Australia do not support (*e.g.*, the boycott of Israel sponsored by the Arab League), you may not agree to or comply with such request. Immediately report this request to the Chief Legal Officer.

The Company does not permit any individual to have weapons of any kind on Company property or in vehicles, while on the job or off-site while on Company business. This is true even if you have obtained legal permits to carry weapons. The only exception to this policy applies to security personnel who are specifically authorized by Company management to carry weapons.

## 16 Government Inquiries

The Company cooperates with government agencies and authorities. Forward all requests for information or regulatory notices to the attention of the Chief Legal Officer at [LegalNotices@iren.com](mailto:LegalNotices@iren.com) immediately to ensure that we respond appropriately.

All information provided must be truthful and accurate.

## 17 Conclusion

This Code contains general guidelines for conducting the business of the Company consistent with the highest standards of business ethics. If you have any questions about these guidelines, please contact your manager or the Chief Legal Officer. The Company expects all of its employees and directors to adhere to these standards.

This Code, as applied to the Company's principal financial officers, shall be our "code of ethics" within the meaning of Section 406 of the U.S. Sarbanes-Oxley Act of 2002 and the rules promulgated thereunder.

This Code and the matters contained herein are neither a contract of employment nor a guarantee of continuing Company policy. The Company reserves the right to amend, supplement or discontinue this Code and the matters addressed herein, without prior notice, at any time.