TERRA FIRMA

TERRA FIRMA EQUITY LIMITED
ACN 675 999 747

CODE OF CONDUCT

Document type	Code
Version	1.0
Approved by	Board of Terra Firma Equity Limited
Approval date	25 February 2026

1. Purpose

This Code sets the minimum standards of conduct expected of directors, officers, employees and contractors when acting for or on behalf of the Company.

2. Core standards

(a) act honestly, lawfully and in good faith;

(b) exercise care, diligence and sound commercial judgement;

(c) treat colleagues, customers, suppliers and other stakeholders with respect;

(d) protect confidential information and Company assets;

(e) avoid or properly disclose conflicts of interest;

(f) maintain accurate records and provide truthful information; and

(g) raise genuine concerns about suspected misconduct.

3. Compliance with law and policy

All personnel must comply with applicable law and Company policies relevant to their role. A person who is uncertain about an obligation should seek guidance before acting.

4. Conflicts of interest

Actual, potential or perceived conflicts must be disclosed promptly. A person must not use their position, information or Company opportunities for improper personal benefit.

5. Confidentiality and information

Confidential information must be used only for legitimate Company purposes and disclosed only to persons authorised to receive it.

The obligation of confidentiality continues after employment or engagement ends.

6. Company assets and records

Company funds, property, systems and records must be used responsibly and for authorised purposes. Financial and operational records must be accurate and complete.

7. Respectful workplace

The Company does not tolerate unlawful discrimination, bullying, harassment, victimisation or retaliation. Personnel are expected to contribute to a safe and professional workplace.

8. Health, safety and environment

Personnel must comply with applicable health, safety and environmental requirements and promptly report material hazards, incidents and breaches.

9. Reporting concerns

Concerns may be raised with a manager, the company secretary, legal counsel or under the Whistleblower Policy. Retaliation against a person who raises a genuine concern is prohibited.

10. Consequences and review

A breach may result in disciplinary or contractual action. The Board may amend this Code at any time.