
CORPORATE CODE OF CONDUCT

The Advance ZincTek Limited Corporate Code of Conduct sets out the standards expected of the Directors and employees of the Company in the performance of their duties. The Corporate Code of Conduct applies to all of the operations and to all Directors and employees of Advance ZincTek Limited (**"the Company"**) and its subsidiaries.

The Company's reputation for honesty and integrity is valuable to the Company and its shareholders, and therefore must be maintained and protected at all times. The Directors and employees of the Company will therefore conduct their business on behalf of the Company in accordance with the highest ethical standards and sound corporate governance.

BUSINESS RELATIONSHIPS

All dealings with customers, suppliers and external parties shall be conducted in a professional and courteous manner.

Commitments to buy or sell on behalf of the Company must be made solely on sound commercial grounds having regard to quality, price and service and in accordance with the Company's authorisation procedures.

Act in accordance with the entity's stated values and in the best interests of the entity.

Act honestly and with high standards of personal integrity.

Act ethically and responsibly.

CONFLICTS OF INTEREST

The Company expects its employees to avoid any circumstances where their personal, financial or other interest may be in conflict (either directly or indirectly) with their responsibilities to the Company.

Any such conflict should be reported to the employee's supervisor or Managing Director. Similarly, any personal interests or obligations of employees which could create any suspicion that actions they take or decisions they make for the Company might be influenced by those personal interests should be reported to the Managing Director.

Employees shall not solicit or accept any benefits from any party in connection with any service or business of the Company. Equally, it is against the policy of the Company to secure business by creating a conflict of interest on the part of an employee of an organisation dealing with the Company.

This policy does not preclude the exchange of ordinary hospitality between persons (such as meals in the normal conduct of business) or the acceptance of unsolicited, non-cash gifts of minimal value where it is clear that the donor is not attempting to influence the recipient.

ANTI-BRIBERY AND CORRUPTION

You should be aware that some actions might be classed as criminal and result in legal action against you. These include bribery, fraud, abuse of public office, extortion, threats, reprisals, secret commissions and other unlawful behaviour.

Any Political donations must be approved by the Board of Directors.

Should you become aware of such behaviour in another employee, the matter must be reported immediately to the Managing Director.

Managers and Directors are required to ensure that all activities of a potentially criminal nature are reported to the Company Secretary and to the Audit and Risk Committees.

WHISTLEBLOWER POLICY

The company has a whistle blower policy in place where employees can report any matter to the chair of the Audit and Risk Committees. The main areas under the policy are:

- Any corruption or acts of fraud.
- Any dealings with external 3rd parties that are outside standard business practices
- Any bullying or harassment.

The chair of the Audit and Risk Committees will

- Safeguard the whistle blower's name.
- Conduct an investigation and report to the Board

The policy will be reviewed annually.