

19 August 2020

Code of Conduct

1. Policy Statement

Sunrise Energy Metals Limited and its controlled entities (**Company** or **Sunrise Energy Metals**) is committed to achieving outstanding performance and results to provide value to our shareholders while considering the interests of our employees, customers, the community, contracting partners and others with whom we do business.

This policy provides guidance to ensure compliance with all legal and ethical standards. In striving for outstanding performance, it is paramount that we ensure Sunrise Energy Metals' Values are reflected in everything we do. The Sunrise Energy Metals Board of Directors is to be informed of any material breaches by a director or senior manager (Key Management Personnel as defined by applicable accounting standards) of this code and of any other material breaches of the code that call into question the culture of the organisation.

2. Scope

This policy applies to the Sunrise Energy Metals Board of Directors, all employees, and any contractors and consultants acting on behalf of Sunrise Energy Metals (**employees**).

3. Policy Content

All personnel covered by the scope of this policy must:

3.1 Personal Behaviour

Sunrise Energy Metals commits to developing diversity through a range of strategies, including the following:

- Act ethically and with integrity;
- Act according to the legislative requirements, policies and ethical codes that apply;
- Make decisions fairly, impartially and promptly, considering all available information, legislation, policies and procedures;
- Treat members of the public and colleagues with respect, courtesy, honesty and fairness and have proper regard for their interests, rights, safety and welfare;

- Do not harass, bully or discriminate against colleagues, members of the public or employees;
- Contribute to a harmonious, safe and productive work environment by personal work habits and professional workplace relationships.

3.2 Communication and Official Information

- Do not disclose official information or documents acquired through work, other than as required by law or where proper authorisation is given;
- Do not misuse company information for personal or commercial gain for yourself or another;
- Adhere to legal requirements, policies and all other lawful directives;
- Respect the confidentiality and privacy of all information as it pertains to individuals.

3.3 Fraudulent and Corrupt Behaviour

- Report any fraudulent or corrupt behaviour to your manager or otherwise in accordance with the Whistleblower Policy;
- Report any breaches of the code of conduct to your manager or otherwise in accordance with the Whistleblower Policy;
- Understand and apply the accountability requirements that apply.

3.4 Use of Company Resources

- Be accountable for company expenditure;
- Use company-funded resources diligently and efficiently. These include office facilities, vehicles and company credit cards.
- Do not use office time or resources for personal gain, financial or otherwise;
- Comply with policies and guidelines in the use of computing and communication facilities and use these resources in a responsible and practical manner;
- Ensure that all company funded travel is for company purposes and is only done when absolutely necessary.

3.5 Record Keeping and Use of Information

- Record actions and reasons for decisions to ensure transparency;
- Ensure the secure storage of sensitive or confidential information;
- Comply with the Sunrise Energy Metals' record keeping procedures.

3.6 Conflict of Interest

- Ensure personal or financial interests do not conflict with your ability to perform your duties in an impartial manner;
- Where conflicts of interest do arise, ensure they are managed to the Sunrise Energy Metals' interest.

4. Reference and Related Documents

- Sunrise Energy Metals Values
- Sunrise Energy Metals Diversity Policy
- Sunrise Energy Metals Whistleblower Policy
- Sunrise Energy Metals Anti-bribery and Corruption Policy

5. Acceptance

I confirm that I have read and understood the Code of Conduct and agree to abide by the conditions stated.

Name: _____

Signed: _____

Date: _____

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