

Code of Conduct

Purpose

This policy establishes AnteoTech Ltd (the Company)'s standards of ethical conduct and professional behaviour. AnteoTech is committed to operating with integrity, transparency and accountability, and recognises its people as its greatest asset. This Code of Conduct (Code) guides how everyone who works for or with AnteoTech is expected to behave when acting on behalf of the Company.

Scope

This policy applies to all AnteoTech personnel, including directors, officers, employees, contractors and consultants, whether engaged on a full-time, part-time, fixed-term or casual basis. It extends to all work-related activities, including remote work, business travel and work functions, and any situation where AnteoTech's reputation or interests may be affected.

Our Values

In interpreting and applying this Code, regard should be had to the Company's values. AnteoTech and its people will:

- conduct business with honesty, integrity and fairness;
- respect and comply with all relevant laws and regulations applicable to the Company;
- treat others with respect;
- use the Company's property and resources responsibly; and
- display personal accountability for their actions and the consequences of those actions.

Policy Statement

This policy outlines AnteoTech's position in relation to ethical conduct and professional behaviour. AnteoTech aligns this policy with the ASX Corporate Governance Principles and Recommendations (4th edition), **Recommendation 3.2 (code of conduct)**, and it operates alongside the Company's Whistleblower Policy (Recommendation 3.3) and Anti-Bribery and Corruption Policy (Recommendation 3.4). The Company shall:

- act with honesty, integrity and fairness in all business dealings and relationships;
- comply with all applicable laws, regulations, ASX Listing Rules and company policies;
- treat all individuals with respect and dignity, and without discrimination, harassment or bullying;
- protect the assets, confidential information and reputation of AnteoTech and its stakeholders;
- protect shareholder interests, funds and investments; and
- avoid, disclose and manage conflicts of interest in accordance with this policy.

Commitment of the Board and Management

The Board and Executive Leadership are committed to leading by example. Every director, manager and employee is expected to demonstrate the behaviours described in this Code. The Board and Executive Leadership are committed not only to complying with the Company's legal obligations, but also to acting ethically and responsibly, and they encourage all personnel to use the principles of this Code as a guide when acting on behalf of the Company.



Standards of Conduct

Honesty, integrity and fair dealing

The Company will deal with its customers, suppliers, competitors and its own people honestly and fairly, and will not engage in deceptive or misleading practices. The Company is committed to complying with the laws and regulations of the countries in which it operates and to observing the spirit as well as the letter of those laws. Any transgression of applicable legal rules is to be reported to Management as soon as a person becomes aware of it. The Company expects all personnel to raise concerns, ask questions and seek guidance whenever they are uncertain about the appropriate course of action.

Scientific Integrity

Research, testing, laboratory records and scientific publications must be conducted honestly, accurately and objectively.

Conflicts of interest

Directors, Management and employees must not place themselves in situations where there is a real or apparent conflict between their personal interests and the interests of the Company. Refer to Conflicts of Interest Policy for details on this.

Anti-bribery, corruption and gifts

The Company has a zero-tolerance approach to bribery and corruption. Refer to Anti-Bribery & Corruption Policy for details on this.

Fraud

The Company has a zero-tolerance policy to fraud and will thoroughly investigate and apply the full force of the law in respect of, any fraudulent conduct where sufficient evidence is obtained. All Directors, Management and employees must exercise reasonable care and diligence to prevent fraud by or against the Company. The Board may implement a fraud and corruption control framework addressing prevention, detection, response and reporting. All suspected incidents will be investigated using the principles of independence, objectivity and natural justice.

Confidentiality, privacy and Company assets

The Company recognises and respects the rights of individuals and will comply with applicable laws regarding privacy and the handling of private and confidential information. Personnel must respect the confidentiality of all information of a confidential nature acquired in the course of the Company's business – including information belonging to the Company, its shareholders, customers and suppliers – and must not disclose or make improper use of that information unless authorised or legally required to do so. Personnel must protect the Company's assets and intellectual property, during and after their engagement, and ensure that Company property, information, position or corporate opportunities are not used for personal gain or to compete with the Company.

Respect in the workplace, diversity and inclusion

The Company is committed to a safe, respectful and inclusive workplace that is free from discrimination, harassment and bullying, and to respecting the human rights of its people. The Company seeks to employ the best available people from diverse backgrounds with the skills required for their roles and values the benefits of diversity (including but not limited to gender, age, disability, ethnicity, marital or family status, religious or cultural background, sexual orientation and gender identity). The Company maintains proper work health and safety practices commensurate with the nature of its business.

Community and environment

The Company will recognise, consider and respect the legal requirements affecting its operations and will comply with all applicable legal requirements. The Company will act with honesty, integrity and fairness in its dealings with the community and will act responsibly towards the environment.

Responsibilities to shareholders and stakeholders

The Company aims to increase shareholder value within an appropriate framework that safeguards the rights and interests of shareholders and the wider financial community, to comply with its systems of control and accountability as part of its corporate governance, and to act with honesty, integrity and fairness towards all stakeholders.

Reporting Concerns and Non-Retaliation

Personnel are expected to report suspected misconduct, fraud, corruption or breaches of this Code. Reports may be made to the relevant manager, the Company Secretary, the Chief Executive Officer or the Chairperson as appropriate, or through the Company's Whistleblower Policy where that policy applies. Reports made in good faith will be treated with respect and, where appropriate, in confidence. The Company is committed to ensuring that no person suffers detrimental treatment as a result of raising a genuine concern in good faith, or of refusing to participate in conduct that may constitute fraud, bribery or corruption.

Consistent with **ASX Recommendation 3.2**, the Board or a committee of the Board will be informed of any material breaches of this Code.

Our Responsibilities

The Board of Directors will:

- endorse, maintain oversight of, and review this Code of Conduct at least annually;
- ensure a consistent and fair disciplinary framework is applied to confirmed breaches; and
- be informed (directly or through a committee) of any material breaches of this Code.

All personnel will:

- perform their duties competently, diligently and in AnteoTech's best interests;
- not engage in fraudulent, dishonest, illegal or improper conduct;
- promptly disclose any actual or potential conflict of interest to their manager or the Company Secretary; and
- report suspected misconduct, fraud or breaches of this policy through appropriate channels.

Our Commitments

AnteoTech is committed to:

- compliance with all applicable legal, regulatory and governance requirements;
- maintaining a safe, respectful and inclusive workplace free from discrimination and harassment;
- protecting confidential information and intellectual property during and after employment;
- protecting shareholder interests, funds and investment through strategies for best practice and continuous improvement;
- providing clear channels for reporting concerns, including through the Whistleblower Policy; and
- annual training and attestation to ensure all personnel understand and uphold this policy.

Consequences of Breach

Non-compliance with this Code may result in disciplinary action, up to and including termination of employment or engagement, and, where warranted, referral to relevant authorities. A consistent and fair disciplinary framework will be applied to confirmed breaches.

Training and Attestation

All personnel will receive training on this Code and will be required to attest annually that they have read, understood and will comply with it.

Periodic Review

The Company will monitor compliance with this Code and will review it at least annually, liaising with the Board, Management and staff, particularly in relation to any areas of difficulty and any suggestions for improvement, which may be raised at any time.

Our Outcomes

This policy aims to foster a culture of integrity, accountability and mutual respect across AnteoTech. Through consistent application, AnteoTech will maintain the trust of its stakeholders, including shareholders, meet its governance obligations, and provide a workplace where all personnel can thrive.

Related Policies and Documents

This Code should be read together with the Company's other governance documents, including the:

- Whistleblower Policy
- Anti-Bribery and Corruption Policy
- Diversity, Equal Opportunity and Anti-Discrimination Policy
- Environmental and Sustainability Policy
- Work Health and Safety Policy
- Continuous Disclosure and Market Communications Policy
- Securities Trading Policy
- Privacy and Data Protection Policy
- Board Charter and
- the Charters of the Board's committees.

Endorsement

This Code of Conduct is endorsed by the Board of Directors and reviewed annually.

Approval

A handwritten signature in blue ink, reading 'M Gray'.

Merrill Gray

Chief Executive Officer (CEO)

27th August 2026