

## DIRECTORS' CODE OF CONDUCT

16 August 2022



The Board of Directors (the "**Board**") of Platinum Capital Limited ABN 51 063 975 431 (the "**Company**") has adopted the Code of Conduct from the Australian Institute of Company Directors.

Each director of the Company ("**Director**") is required to:

1. act honestly, with high standards of personal integrity, in good faith and in the best interests of the Company as a whole;
2. act ethically and responsibly;
3. use care and diligence in fulfilling the functions of office and in exercising the powers attached to that office;
4. use the powers of office for proper purpose, in the best interests of the Company as a whole;
5. recognise that the primary responsibility is to the Company as a whole but may, where appropriate, have regard for the interests of all stakeholders of the Company;
6. not make improper use of information acquired as a Director;
7. not take improper advantage of the position of Director;
8. manage properly any conflict with the interests of the Company;
9. be independent in judgement and actions, and to take all reasonable steps to be satisfied as to the soundness of all decisions taken by the Board;
10. ensure that confidential information received in the course of exercising directorial duties remains the property of the Company and such information is not disclosed, or allowed to be disclosed unless authorised by the Company or the person from whom the information is provided, or is required to be disclosed by law;
11. not engage in conduct likely to bring discredit upon the Company;
12. not engage in bullying, harassment or discrimination;
13. comply with the spirit, as well as the letter, of the law and with the principles of this Code;
14. ensure that "whistleblowers" are properly protected in accordance with the Company's Whistleblower Protections Policy;
15. comply with the following policies:
  - a. Platinum Capital Limited Securities Trading Policy;
  - b. Platinum Asia Investments Limited Securities Trading Policy;
  - c. Platinum Asset Management Limited Securities Trading Policy;
  - d. Platinum Group Social Media Policy;
  - e. Platinum Group Anti-bribery and Corruption Policy; and
  - f. Platinum Group Modern Slavery Policy;
16. report any breaches of this Code to the Board; and
17. attend the Company's annual general meeting.

### POLICY REVIEW

1. This Policy should be reviewed at least once every two years (unless regulatory or other changes arise in the interim which require the policy to be updated more frequently).
2. The Board has delegated authority to the Company Secretary to make administrative changes (such as changes to position titles) to the policy without requiring the Board's prior approval.