STATEMENT OF VALUES

1. INTRODUCTION

Orion Equities Limited ABN 77 000 742 843 (ASX:OEQ) (the **Company**) instils and reinforces a culture across the Company of acting lawfully, ethically and responsibly. It seeks to operate in line with the values set out below and ensure directors, senior executives and employees work to reinforce these values.

The Company's Senior Executives have the responsibility of instilling these values across the Company including ensuring that all employees receive appropriate training on the values and referencing and reinforcing the values in interactions with employees.

As per Principle 3 .1 of the ASX Corporate Governance Council's Corporate Governance Principles and Recommendations (4th Edition, released on 27 February 2019) (**Recommendations**):

(a) a listed entity should instil and continually reinforce a culture across the organisation of acting lawfully, ethically and responsibly; and

(b) a listed entity should articulate and disclose its values.

2. STATEMENT OF VALUES

The Company has adopted this Statement of Values to express the standards and behaviours it expects from its Directors, Senior Executives and employees to fulfil its purpose and meet is goals.

The Company is committed to achieving its purpose and investment objectives in a manner that is consistent with the following principles:

- Actively pursue the long term generation of shareholder wealth;
- Conduct business in the best interests of the Company with efficiency and professionalism and in a manner consistent with the reasonable expectations of our shareholders, the local communities in which the Company operates and the broader community;
- Target environmentally sustainable outcomes;
- Act with the highest standards of honesty, integrity, fairness and equity in all dealings, both internally and externally, and promote such ethical behaviour amongst all personnel and across all aspects of the Company's operations;
- Treat others with dignity and respect all people and cultures – embrace the value and contribution of all individuals within the Company;
- Act in a manner that upholds the Company's reputation.
- Provide and maintain a safe and non-discriminatory working environment to safeguard the health and safety of employees, consultant contractors and other persons who visit our workplace, or who we work with; and
- Respect the 'rule of law' and value compliance with Company policies, procedures and practices.

3. PUBLICATION OF POLICY

This Policy is made available to all personnel and published on the Company website at: http://orionequities.com.au/corporate-governance

Adopted by the Board on 15 October 2021