



REEF CORPORATE SERVICES LIMITED (RCS) RESPONSIBLE ENTITY OF THE REEF CASINO TRUST (TRUST)

CORPORATE CODE OF CONDUCT

This code of conduct applies to directors and to all employees of

- Reef Corporate Services Limited (“responsible entity”);
- Reef Casino Trust (“trust”); and
- The Reef Hotel Casino (Casinos Austria International (Cairns) Pty Limited) (“operator”).

Directors and employees must demonstrate the highest level of behaviour and ethics and act in accordance with our statement of values. The purpose of this code is to

1. Inform directors and employees of the Board’s expectations of them
2. Ensure compliance with legislation relevant to an employee’s responsibilities
3. Fulfil the expectations of our unit or shareholders
4. Maintain confidence in the integrity of the responsible entity, the trust and the operator and to preserve and enhance our corporate reputation

1. Conflicts of interest

Directors and employees should avoid any activities that involve or could appear to involve a conflict of interest between their own personal interests and the interests of their employer.

Directors and employees should not use information gained through their employment or through their position as directors or employees to seek to obtain an advantage for themselves or others or to cause detriment to the responsible entity, the trust or the operator.

Examples of potential conflicts of interest include

- An employee initiating a purchase of goods or services from a company associated with that employee or that employee’s relatives
- Being involved in the employment of a relative or directly supervising a relative in the workplace

To avoid conflict of interest directors and employees must:

- declare any conflict of interest to senior management or the Board as soon as they become aware of any conflict or potential conflict in relation to a customer, supplier or service provider;
- declare any direct line management relationship between family (spouse, partner, children, parents, siblings);
- Not seek or accept offers of money, gifts, favours or entertainment which might influence or appear to influence the making of a business decision. An employee

receiving a small gift (eg at Christmas time) or an invitation to a sporting or social event should seek approval from their manager before accepting;

- Not be involved in any other business or position outside their employment that may result in the employee being unable to effectively carry out their duties and responsibilities to their employer;
- Seek approval of senior management or the board before accepting a directorship on the board of another company;
- Always use company property for the use it was intended and not for personal use unless properly authorised.

Directors and employees should discuss any concerns regarding actual or potential conflicts of interest with their manager (the Chairman for directors).

2. Trading in Reef Casino Trust Units (Insider Trading)

Directors and employees must not trade in Reef Casino Trust units, influence others to trade or communicate information to others if they are in possession of market sensitive information which is not available to the share market.

The Reef Casino Trust's unit trading policy sets out guidelines for directors and specified employees.

Employees should decline to comment on the state of the company or the value of RCT units.

3. Confidentiality

Directors and employees are required to protect information that is confidential to their employer. This includes appropriate protection of data and information from cybersecurity threats, through compliance with internal data security policies. These obligations of confidentiality continue after an individual's employment has ceased.

Information that is not generally available concerning the operation or strategies of their employer must be used for authorised purposes only and must not be disclosed to outside parties without proper authority.

Directors and employees must not make public statements unless expressly authorised to do so.

4. Compliance with law

The Reef Casino Trust Compliance Plan has been established to ensure compliance with legislation including the Corporations Act, the Trust Constitution and the Casino Control Act. The Compliance, Audit and Risk Committee monitors compliance with the plan.

In addition, directors and employees must comply with the letter and the spirit of all laws and regulations.

All directors and employees are expected to understand the laws that affect both their roles and their general business conduct. If an employee is unclear of the impact that the law may have on their role, they should seek advice from the Company Secretary of the responsible entity

Any instances of non-compliance with the law are to be reported to the Compliance Officer.

5. Privacy

Employees must respect the privacy of customers, other employees and unitholders and only use information for the purpose it was collected.

6. Treatment of others

Employees must treat customers, unitholders, suppliers and fellow employees fairly, honestly and in an open manner.

Discrimination, bullying and harassment in any form is unacceptable.

7. Political contributions

Directors and employees must not make any political donations on behalf of the responsible entity, trust, or operator, unless authorised by the Board.

8. Anti-bribery and corruption

Bribery and corruption in any form is prohibited. The making of facilitation payments or the giving or receiving of secret commissions is prohibited.

Directors and employees must not make, solicit, encourage or accept an inducement or any form of bribe or kick-back to or from anyone, including a government official, a supplier or customer as a reward for favourable treatment, business information or any other purpose.

9. No tips from casino players or patrons

Directors and casino licenced employees must not accept or solicit a tip, gratuity, consideration or other benefit from a casino player or patron whether it takes place inside or outside of the casino.

10. No gambling at the Reef Hotel Casino

Directors and employees must not (directly or indirectly) gamble at the Reef Hotel Casino. They must not approach any of the gambling outlets/facilities, including the gaming tables, gaming machines, TAB and Keno at the complex at any time.

11. Work health and safety

The Reef Hotel Casino is committed to providing and maintaining a safe and healthy workplace (including a safe work environment, safe systems of work, safe plant, equipment and substances) in order to prevent injuries and/or illnesses being sustained by employees, contractors, guests and visitors and any other persons on site.

All Directors and employees are required to read and be familiar with the Reef Hotel Casino Work Health and Safety policy statement.

12. Business records

Employees must ensure that business and financial transactions are properly recorded and maintained. False, fictitious or misleading entries regarding any transaction are prohibited. For example, employees should not falsify hours worked or leave taken.

13. Illegal or undesirable activity

Employees must be watchful for signs of money laundering, drug dealing, child slavery or exploitation, prostitution or any other forms of illegal activity by customers or employees. If employees suspect that someone is engaging in such activity, they must report their suspicion to their manager.

14. Fair Trading & Competition

Employees must adopt fair trading practices. For example, to avoid breaching competition laws employees must not discuss or agree pricing with competitors.

15. Gambling Harm Prevention Responsibilities

Directors and employees must participate in preventing gambling-related harm by monitoring customer behaviour, responding to signs of harm, and providing clear information on support services. Regular training, responsible marketing, confidentiality, and collaboration with support organisations are required to uphold our commitment to safer gambling and corporate integrity.

16. Responsible Service of Gambling

Employees who are involved in providing gambling services must do so in accordance with the Responsible Service of Gambling Policy.

The Reef Hotel Casino is committed to the in-house training, education and support of all staff in the areas of Responsible Service of Gambling (RSG).

All new employees are required to supply a nationally recognised training certificate for Responsible Service of Gambling prior to commencement of their employment. In addition specific RSG training is regularly provided to all staff members who directly undertake RSG duties / responsibilities.

17. Responsible Service of Alcohol

Employees who are required to supply/serve alcohol have an obligation to our customers to provide responsible service in accordance with the Liquor House Policy.

The Reef Hotel Casino is committed to the in-house training, education and support of all staff in the areas of Responsible Service of Alcohol (RSA). Employees directly required to supply/serve alcohol must hold a relevant RSA statement of attainment.

All new casino and food and beverage employees must provide a nationally recognised Responsible Service of Alcohol certificate prior to commencement of their employment. In addition specific RSA training is regularly provided to all staff members who directly undertake RSA duties / responsibilities.

18. Anti-Money Laundering and Counter-Terrorism Financing (AML/CTF) obligations

All Directors and employees must adhere to all applicable Anti-Money Laundering and Counter-Terrorism Financing (AML/CTF) laws, regulations, and internal policies, and take reasonable steps to prevent The Reef Hotel Casino from being used to facilitate financial crime. This includes conducting appropriate customer due diligence, verification of customer identities, and monitoring of transactions for unusual or suspicious activity.

Any concerns or potential breaches must be promptly reported via the Unusual Matter Reporting (UMR) application in accordance with internal procedures. Employees are required to maintain strict confidentiality, complete mandatory AML/CTF training, and stay informed about relevant regulatory requirements.

Failure to adhere to these obligations may result in disciplinary action and expose both the individual and The Reef Hotel Casino to legal and reputational risk.

19. Compliance with code of conduct / Internal policy & procedures

All Directors and employees are responsible for ensuring their own individual compliance with the code and any relevant internal policy & procedures supporting this code. Employees are encouraged to report any actual or potential breaches of the code of conduct to management or the Board without fear of retribution in accordance with the whistleblower policy.

A breach of the Code may result in disciplinary action. Such disciplinary action may range from counselling to termination of employment where there are persistent or serious breaches.

20. Annual review of code of conduct

The Company Secretary of the responsible entity is to conduct an annual review of the code to ensure it continues to reflect the law and the Board's commitment.

Employees are encouraged to report any difficulties or challenges in complying with or in understanding the code to the Company Secretary of the responsible entity and this will assist in the annual review of the code.

Approved by the board on 26 May 2026