ENVIRONMENT, SOCIAL & GOVERNANCE REPORT

CEO's Statement

Codan's purpose is to create long-term value through innovation, reliability, and responsible business practices. As a global technology company, we remain committed to operating in a way that drives commercial success and delivers positive outcomes for our people, communities, and the planet. This ESG Report outlines the progress we have made across key areas in FY25, as we continue to integrate "sustainability" into every aspect of our operations.

This year we expanded our community engagement, investing in programs that promote education, inclusion, and opportunity. Most notably, our support of Yalari is enabling Indigenous students to access quality education and life-changing experiences. We continue to inspire the next generation of STEM leaders through ongoing support of industry based and academic programs. Codan also became a member of the Committee for Adelaide and the American Chamber of Commerce in Australia, strengthening our ties with the communities and markets in which we operate.

We took meaningful steps to prepare for the mandatory climate-related disclosures that will commence in FY26 under the Australian Sustainability Reporting Standards. Our focus has been on establishing a robust system to capture data across Scope 1, 2, and 3 emissions. This provides the foundation for setting credible targets, as those must be based on reliable and consistent information. We are well advanced in this work, which represents a critical step towards setting and tracking future targets.

We partnered with Adelaide-based environmental consultancy 2XE to enhance our emissions tracking and scenario planning capabilities, including deployment of their carbon management software which will scale with our operations globally. A highlight of FY25 was being awarded the Green Industries South Australia AIM Grant, which supports our efforts to embed circular economy principles into our product development and value chain strategy.

Building resilience and securing long-term success in a changing world requires a clear focus on climate, governance, and social responsibility. This year's ESG Report reflects Codan's progress and growing maturity in these areas. We remain committed to strengthening our foundations and preparing for the opportunities and challenges ahead.

Sincerely,

Alf Ianniello
Managing Director and CEO

ESG FRAMEWORK

ENVIRONMENT

Monitor global environmental footprint and continue preparation for mandatory climate reporting.

Ensure environmental systems are scalable in anticipation of future growth.

Support initiatives that create a positive environmental impact in our business operations and communities.

SOCIAL

Encourage, promote and develop all students, regardless of gender, age, family status, culture, ethnicity, or religion to pursue a career in STEM.

Target Community Programs that assist disadvantaged groups within the communities in which our business operates.

Empower and support a connected and high-performing workforce to deliver long term value creation.

GOVERNANCE

Remain committed to conducting business in an honest, ethical and accountable way and in accordance with our core values.

Uphold a strong governance program, including a Sustainability Council, dedicated to identifying and managing risks, issues and opportunities that are important to our business and stakeholders for long term value.

About this Report

This ESG Report seeks to provide information regarding the material aspects of Codan's sustainability practises across Codan and its controlled entities during the year ended 30 June 2025 (**FY25**). The ESG Report (**Report**) is published on 19 September 2025 and forms part of Codan's Annual Report.

This Report has been prepared in reference to the Global Reporting Initiative (**GRI**) Standards. For a full list of disclosures referenced in this report, please refer to the GRI Content Index available in the ESG Report at https://codan.com.au/who-is-codan/corporate-governance/. The information contained within this Report has been compiled with the contribution of various leaders across the business and has been approved by the Codan Board. Please note this Report has not been externally assured. We welcome any feedback and questions you may have on the information presented and encourage you to contact us at sustainability@codan.com.au.

List of Material Topics

Environment
Social – Our People
Social – Our Community
Governance – Corporate Governance Statement
Governance – Business Ethics / Behaviour
Governance – Our Supply Chain
Governance – Cyber Security
Governance – Tax

All data referenced in this report is in AUD unless otherwise specified.

ENVIRONMENT

Climate Change

Codan remains committed to doing its part to mitigate climate change and adapt to a changing world.

Codan supports the goals of the Paris Agreement to limit the global temperature rise this century to well below 2°C above pre-industrial levels and strive to limit this to 1.5°C. These goals require a collective effort across all sectors and economies to rapidly reduce greenhouse gas emissions. This calls for a diligent approach to understand the company's emissions profile and the actions required to reduce emissions.

Codan is also building its understanding of the climate-related risks and opportunities that may impact Codan's business model and value chain in the short, medium and long term. This assessment will help inform Codan's strategic decision-making and planning and reinforce Codan's resilience to the developments and uncertainties of a rapidly changing world.

Codan's Approach to Climate-Related Disclosures

Codan has provided voluntary climate-related disclosures in alignment with the Taskforce for Climate Related Financial Disclosures (**TCFD**) Recommendations since FY23 and followed a TCFD Roadmap to progressively mature its approach. In FY25, Codan has evolved this reporting approach towards the more detailed requirements of the Australian Sustainability Reporting Standard for climate-related disclosures (**AASB S2**).

Codan plans to publish its first mandatory report under AASB S2 for FY26. In preparation for this new reporting regime, in FY25 Codan has taken the following steps:

- Completed a gap analysis for Codan's readiness to report under AASB S2.
- Completed a climate-related risks and opportunities assessment and prepared a provisional list for further analysis.
- Reviewed Codan's overall risk management processes and identified options for integrating processes for climate-related risks and opportunities.
- Established new processes for the collection of Scope 1, 2 and 3 emissions data.
- Initiated a project to analyse embodied carbon across Codan's product range and identify opportunities to decarbonise Codan's value chain through circular economy initiatives.
- Continued to engage with key suppliers on climate adaptation and decarbonisation.

More information about these steps is provided in the sections below on: Governance, Strategy, Risk management and Emissions Profile.

During FY26, Codan will assess its climate resilience using climate scenario analysis and investigate the financial effects of relevant climate-related risks and opportunities. In addition Codan will continue to improve its data collection processes for greenhouse gas emissions.

These steps will enable Codan to determine the materiality of climate-related risks and opportunities, inform Codan's strategic and risk management response and assist in the development of a transition plan.

Governance

Codan is committed to responsible and effective governance, which promotes the integrity and efficiency of the business and maximises shareholder value. In accordance with the Governance pillar of Codan's ESG Framework, we aim to uphold a strong governance program including the utilisation of a Sustainability Council. Codan is dedicated to identifying and managing risks, issues and opportunities that are important to our business and stakeholders, which will assist in creating long term value.

Board Oversight

The Codan Board has overall responsibility for the oversight of group risks and opportunities, including sustainability and climate related issues. The Audit and Risk Committee (**ARC**) oversees the development and monitoring of risk management policies implemented by management. The Board has delegated authority to the ARC in respect of sustainability and climate-related risks. The ARC reports regularly to the Board on its activities.

The ARC assists the Board in its oversight of financial and non-financial risks including climate-related risks and other ESG factors. This responsibility is explicitly described in the ARC Charter. The ARC Charter also allocates responsibility to the ARC for reviewing and recommending to the Board any reporting to shareholders on matters considered material, including reporting on any material information about climate-related risks.

Quarterly updates are provided to the Board by the General Counsel and Joint Company Secretary on all ESG initiatives, with a focus on climate related actions. In FY25, these updates have also kept the Board informed of Codan's progress to prepare for compliance with the new requirement of the AASB S2.

In addition to quarterly updates, Codan's board management software has a specific channel to keep the Board informed of ESG and climate-related news on an ongoing basis.

Management

Management is responsible for the implementation of Codan's group risk management policies and procedures, including the implementation of Codan's ESG Framework and the recommendations of the Sustainability Council.

In accordance with its Terms of Reference, the Sustainability Council is expressly tasked with considering the physical risks of climate change for Codan's businesses, as well as the risks and opportunities that may be material for Codan as the world transitions to a low carbon economy. Additionally, the Sustainability Council is committed to achieving a high standard of environmental performance and has oversight of the policies and operational controls of environmental, health and safety, and social risks.

Members of the Sustainability Council include Codan's General Counsel and Joint Company Secretary and its Chief Human Resources Officer (**CHRO**). The council is appropriately represented from all parts of the global business, with members from Codan's facilities and supply chain function along with management representatives from DTC, Zetron and Minelab.

As outlined in its Terms of Reference, the Sustainability Council is on track to conduct four formal meetings each year and the meetings for FY25 were all well attended.

The CHRO is the executive representative on the Sustainability Council. The CHRO reports any material ESG and climate related issues to the executive team. The General Counsel is the chair of the Sustainability Council and reports directly to the CEO and CFO on all ESG matters.

ESG REPORT **ENVIRONMENT**

Strategy

Codan's strategy for managing climate-related risks and opportunities is guided by Codan's primary focus on strengthening the business to achieve sustainable, profitable growth for the future. Adaptability, agility and diversification are central elements of Codan's business model and provide the basis for Codan's resilience to climate-related changes, developments and uncertainties.

With a strategic commitment to sustained investment in innovation and product development to maintain its competitive position across all segments, Codan is proactively exploring the opportunities that may arise in a low-carbon economy. At the same time, Codan recognises the importance of understanding and managing its exposure to the physical impacts of climate change across Codan's operations and value chain, and to develop a meaningful and measurable plan to decarbonise.

Climate-Related Risks and Opportunities

Codan faces a range of risks and opportunities associated with the transition to a low carbon economy and the physical impacts of the changing climate.

In FY23, Codan undertook an initial assessment of climate-related risks and opportunities relevant for Codan's business, starting with a focus on contract manufacturing. In FY24, Codan expanded these parameters to cover Codan's global operations and value chain. In FY25, Codan continued this analysis using an approach to identify climate-related risks and opportunities that will enable Codan to align with AASB S2.

Inputs

Codan used a range of internal and external sources of information as inputs for the identification of climate-related risks and opportunities. Internal data was sourced from Codan's prior work on climate-related risks, Codan's risk registers and experience of past climate-related events.

Interviews were conducted with key internal stakeholders in Minelab, Zetron and DTC to map their value chains and understand the key resources and relationships that each business unit depends on and/or impacts to generate cash flows. Stakeholders provided insights on potentially relevant climate-related risks and opportunities.

Codan also used external data from climate-related disclosures of peers and disclosure topics of relevant SASB Standards.

Time Horizons

The relevance of future effects of climate-related risks and opportunities was also considered, with reference to time horizons used by Codan for budgets, business cycles, product cycles and strategy horizons at business unit level and group level. Relevant time horizons were identified as 0-2 years for short term, 3-5 years for medium term and out to 2050 for long term.

Materiality Assessment

Codan's focus in FY25 was to complete a provisional assessment of climate-related risks and opportunities that could have potential financial impact in the short, medium and long term. Through the process described above, Codan developed a "provisional list" of climate-related risks and opportunities.

Codan engaged with its CFO to review this provisional list against the relevant requirements of AASB S2 in relation to the identification of climate-related risks and opportunities that could reasonably be expected to affect Codan's prospects and the requirement to identify and disclose material information in Codan's first mandatory report in FY26.

In FY26, Codan will deepen its understanding of the effects of these climate-related risks and opportunities and use scenario analysis to assess Codan's climate resilience. Findings from these steps will inform Codan's determination of the material information that must be disclosed in Codan's mandatory report in FY26.

The provisional list is summarised in the table on the following page.

Physical Risks

Risks associated with the physical impacts of climate change can be acute (arising from changes in the severity and frequency of weather events) or chronic (longer term shifts in climatic patterns such as rising sea levels). The physical impacts of climate change have the potential to damage Codan's physical assets, affect operations and disrupt Codan's upstream value chain. Codan's main exposure is in product manufacturing and component sourcing.

Transition Risks and Opportunities

Transition risks are those arising from policy, legal, technology, market and reputational changes associated with the transition to a low carbon economy, mitigation and adaptation to climate change. Policy and legal changes have the potential to increase Codan's operating expenditure through rising energy costs and carbon pricing. Codan's competitive position may be impacted by customer and stakeholder expectations of Codan's performance in reducing emissions and improving energy and resource efficiency.

Transition gives rise to opportunities for Codan to collaborate with its upstream value chain to improve efficiency across production processes and to innovate to reduce embodied carbon in Codan's products.

The provisional list of climate-related risks (**R**) and opportunities (**O**) is set out below.

Risk type	Risk summary	R/O	Potential impacts	Timeframe
Physical: **Acute and chronic**	*Physical climate hazards (severe weather, extreme heat, extreme rain/ flood, sea level rise, drought/water stress) impacting assets, operations, workforce and supply chain*	R	• Disruption and productivity loss in product manufacturing • Disruption to component sourcing	Short, medium and long term
Transition: **Policy and legal**	*Emerging regulation on emissions reduction and carbon pricing*	R	• Increased operating costs associated with manufacturing, transport, distribution • Increased supply chain costs	Medium and long term
Transition: **Policy and legal/ products and services**	*Emerging regulation on sustainable products (energy efficiency, durability, repairability, recyclability)*	R/O	• Increased operating costs associated with development, manufacturing and recycling of metal detection products	Medium and long term
Transition: **Reputation**	*Growing stakeholder interest in sustainability, emissions and energy efficiency performance*	R/O	• Reduced/increased revenue • Competitive position • Employee value proposition	Long term
Transition: **Market**	*Strengthening requirements in government procurement for emissions reduction*	R	• Increased operating costs • Higher capital costs for investment in low carbon solutions and offsets	Medium and long term
Transition: **Resilience**	*Agility and adaptability of business model*	O	• Competitive position • Business continuity and risk management	Short, medium and long term
Transition: **Resilience**	*Engagement with supply chain on emissions reduction and adaptation*	O	• Business continuity and risk management • Reduced emissions	Short, medium and long term
Transition: **Energy source**	*Increasing use of renewable energy sources*	O	• Decreased operating costs • Reduced emissions	Short, medium and long term
Transition: **Resource efficiency**	*Efficiency in manufacturing/ production and distribution*	O	• Decreased operating costs • Reduced emissions	Short, medium and long term

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Climate Resilience

Codan has significant capacity to adapt and be agile in response to major disruptions such as Covid-19. Redundancy, speed and resilience are built into Codan's operations. Codan's business model and strong supply chain relationships provide the foundations for resilience to the short and longer term uncertainties and challenges that may arise as the economy transitions and the climate continues to change.

In FY26, Codan will deepen this understanding of climate resilience through the use of scenario analysis to assess the effects of climate-related risks and opportunities over short, medium and long term time horizons and the implications of these scenarios for Codan's strategy and planning.

Scenario analysis under AASB S2 is a critical tool for identifying and assessing climate-related risks and opportunities that could reasonably be expected to affect Codan's financial prospects. By evaluating multiple plausible future climate scenarios, Codan can systematically consider the potential impacts on its business model, strategy, and financial position. This forward-looking approach supports the robust identification and disclosure of material climate-related information, ensuring compliance with AASB S2 requirements.

Engaging with Contract Manufacturers

Engaging to ensure a strong, sustainable supply chain is an important factor in Codan's resilience.

In FY23, Codan initiated the process of engagement with contract manufacturers on energy and resource efficiency, emissions reduction plans and adaptation of their sites to physical risks. Discussions have continued through FY24 and FY25 with Codan's two largest manufacturers, Venture Corporation Limited (**Venture**) and Plexus Corp. (**Plexus**).

Plexus is a member of the UN Global Compact and shares Codan's public commitment to building a better world through sustainable and responsible business practices. For FY24, Plexus reported a groupwide 6.4% reduction in Scope 1 and 2 GHG absolute emissions and a 13.7% waste to landfill intensity reduction from 2023 baselines. Plexus reports a target for FY25 to achieve absolute emissions equal to or less than the 2023 baseline and a 5% waste to landfill intensity reduction from 2024.

Plexus recognises the importance of establishing more sustainable production processes and partnering with customers like Codan to reduce the environmental impact of the customised manufacturing solutions Plexus deploys. Codan will continue to explore initiatives with Plexus including:

- integrating renewable, recycled and highly recyclable inputs into production processes;
- developing more sustainable packaging solutions and alternative transportation to reduce emissions; and
- use of Lifecycle Assessment (**LCA**) services to provide a baseline of a product's environmental impact and identify opportunities to reduce emissions for Codan.

Venture has also committed to minimise its environmental footprint by maximising efficiency of manufacturing operations and reducing emissions. For FY24, Venture reported a groupwide reduction of Scope 1 and 2 GHG absolute emissions of 24% from a 2022 baseline. Venture reports a Science Based Targets initiative (SBTi) aligned emissions reduction target of 42% in Scope 1 and 2 GHG emissions by 2030 from a 2022 baseline. Venture also reports group-wide targets to reduce water usage intensity across all sites.

Venture's solar panel installation in Penang contributed around 20% of site electricity consumption for FY24 and further installation has continued in 2025.

Operational efficiency is also central to Venture's decarbonisation journey. In 2024, Venture replaced older machinery with more energy-efficient models.

Other groupwide manufacturing initiatives include:

- implementation of Restriction of Hazardous Substances (RoHs) Directive with RoHs certified equipment in Codan's facilities;
- implementation of Ozone Depleting Substance (ODS) FREE Process Verification Scheme;
- control and management of emissions, noise and wastewater discharge in all Codan facilities;
- establishment of waste management systems and recycling programs;
- resource conservation programs on the use of water, power, paper and other materials in Codan manufacturing facilities and offices; and
- promulgation of Codan's Environmental Policy and its programmes.

Initiatives that were achieved by both Plexus and Venture in their FY24 included:

- ISO 14001 certification for sites manufacturing Codan's products; and
- no reported environmental related incidents.

Opportunities to Decarbonise through Circular Economy Initiatives

Codan is proactively exploring strategies that not only reduce emissions but also promote resource efficiency and sustainability throughout its operations and supply chain. In FY25, Codan resolved to undertake a project to analyse embodied carbon in its products and identify opportunities to decarbonise the value chain through circular economy initiatives. Project objectives are to:

- quantify and compare embodied carbon across Codan's diverse product range;
- identify common carbon hotspots and systemic opportunities for impact reduction;
- evaluate and prioritise circular economy interventions across product lines to improve sustainability performance and support Codan's transition planning; and
- support Codan's transition planning process by establishing a clear roadmap for decarbonising Codan's value chain through circular economy initiatives.

Work on the project will progress in FY26 and will be completed with assistance from the Green Initiatives South Australia Aim Grant discussed below. The project forms part of Codan's developing response to opportunities and risks in the global transition to a low carbon economy. Findings from the project can inform Codan's planning for resilience to future regulatory risks and changing stakeholder expectations.

Risk Management

Codan has an enterprise risk management framework based on the principles of ISO 31000. Codan intends to integrate climate-related risks and opportunities into the existing framework, with the recognition that integration is likely to involve a process of improvement over time and its approach must be proportionate.

Codan has been developing its governance of climate risks over several years. The Board and Sustainability Council are aware of climate-related issues and understand the concept of climate change. At executive and management level, there is accountability for climate-related issues across the legal, sustainability, finance and risk functions. Climate-related issues are reported to ARC/the Board on a regular basis.

Certain climate-related physical and transition risks are already addressed in the Codan Group Risk Register. These relate to business continuity, interruption of material supply, technology risk, reputation and policy risks. Controls include the ongoing review of Codan's Business Continuity Plan, continued investment in R&D, governance of ESG issues through the Sustainability Council and the ESG Framework and continued public reporting of Codan's sustainability performance.

In FY25, Codan completed a provisional assessment and prepared a provisional list of climate-related risks and opportunities as part of its preparations for mandatory reporting under AASB S2. Refer to the section above on "Strategy" for further details. The next step is for Codan to conduct scenario analysis to develop more detailed understanding of the effects of these risks and opportunities over short, medium and long term horizons.

In FY25, Codan also undertook a review of its risk management processes to identify ways to develop processes appropriate for climate-related risks and opportunities and options to integrate these processes into the overall risk management approach.

Codan will tackle this project in progressive phases, beginning with the following actions:

- Review risk categories and sub-categories in Codan's Risk Management Policy and Framework and consider amendments to address climate change.
- Amend Group Risk Register to address provisionally identified climate-related risks and opportunities, and trial adjustments to risk assessment and prioritisation metrics to respond to these particular climate-related issues.

In FY26, and beyond, Codan will continue to refine this approach using outputs from scenario analysis, financial quantification of climate-related risks and opportunities and the assessment of Codan's climate resilience.

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Green Industries South Australia Aim Grant

In June 2025, Codan was awarded an Assess Implement Monitor (**AIM**) grant from Green Industries South Australia (**GISA**) to support its Value Chain Sustainability and Circularity Assessment Project. The AIM program, part of GISA's Business Sustainability Program, assists South Australian businesses to accelerate sustainable change by filling information gaps and supporting investment in environmentally sustainable and circular practices.

The project, delivered by Adelaide-based sustainability consultancy 2XE, will conduct a high-level assessment of Codan's product value chain to identify embodied carbon emissions and opportunities for circular economy interventions. This includes evaluating materials, supply chains, logistics and end-of-life impacts across Codan's diverse product portfolio. Key outcomes will include hotspot identification, a register of circularity interventions, scenario modelling and a strategic roadmap to support Codan's transition planning. Codan will deliver the project in several phases over FY26, starting with data collection, followed by carbon profiling, circularity maturity assessments, scenario modelling and final reporting. Milestones will be tied to the completion of these stages, with the final deliverables including a centralised product data model, emissions summaries, circularity opportunity registers and an implementation roadmap.

The AIM grant directly supports Codan's ESG and climate disclosure strategy. With the first mandatory climate-related disclosures due in FY26 under AASB S2, the AIM grant enables Codan to strengthen its understanding of Scope 3 emissions, being those arising from upstream and downstream activities in its value chain. These emissions form the majority (over 95%) of Codan's total carbon footprint, and this assessment is expected to uncover new pathways for reduction, innovation and compliance.

Work under the AIM grant formally commenced in July 2025 and is scheduled for completion by November 2026. Codan will continue collaborating with 2XE and GISA throughout this period and intends to publicly report on the key non-sensitive findings, including the strategic roadmap and high-impact opportunities. These outputs will be a cornerstone of Codan's FY26 ESG reporting and broader decarbonisation journey.

Emissions Profile

Emissions Reporting Approach

The emissions reporting approach undertaken in FY25 is in line with the GHG Protocol Corporate Accounting and Reporting Standard 2004 (**GHG Protocol**), which is the basis for the Australian climate reporting guidelines. The GHG Protocol ensures relevance, completeness, consistency, transparency and accuracy by outlining how a company should:

- **Establish an organisational and operational boundary** (determine which businesses and assets within the organisation are to be included in the scope);
- **Set an emissions boundary** (determine which emissions sources from within the organisational boundary are relevant to the emissions profile);
- **Calculate emissions** (by selecting appropriate and available activity data, calculation methods, and emissions factors); and
- **Report assumptions** (to ensure transparency and allow validation of results).

In FY25, Codan introduced a Data Governance structure to streamline and enhance the data capture process as the business moved to an online software platform (**Recouple**) for the calculation of greenhouse gas (**GHG**) emissions.

Operational Boundary

Codan's FY25 GHG emissions inventory is being prepared in line with the operational control consolidation approach as per the GHG Protocol. Under the operational control approach, Codan will account for 100% of the emissions from operations over which it or one of its subsidiaries has 'the full authority to introduce and implement its operating policies' (see Table 1 below).

Codan adopts the operational control approach to ensure a clear and consistent attribution of GHG emissions aligned with its managerial influence and decision-making authority. This approach reflects Codan's ability to directly manage and implement operational policies that drive emissions outcomes, providing a more accurate and actionable emissions inventory.

Table 1: GHG Protocol Consolidation Approaches

Approach	Description
Operational Control	**Under the operational control approach, a company accounts for 100% of the emissions from operations over which it or one of its subsidiaries has operational control.**
Financial Control	Under the financial control approach, a company accounts for 100% of the emissions from operations over which it, or one of its subsidiaries, has financial control (i.e., >50%).
Equity Share	Under the equity share approach, a company accounts for GHG emissions from operations according to its share of equity in the operation.

Emissions Boundary

Codan's emissions boundary was set using a relevancy test. Table 2 below summaries the differences between FY24 and FY25 emissions boundary and key changes in calculation methodology and or data sets.

Table 2: Codan Limited emissions boundary

Category	Included in FY24	Included in FY25	Notes and key changes
Scope 1 Stationary Fuel	Yes	Yes	LPG consumption excluded in FY24 due to data availability. Through data capture improvements in FY25, LPG has been able to be quantified and included.
Scope 1 Fleet Fuel	Yes	Yes	FY24 used all spend allocated to applicable internal general ledger (**GL**) code. This GL code captures both fuel purchases, vehicle repairs and maintenance and fuel reimbursements for staff owned vehicles. FY25, included the actual fuel volume (AU and US) and distance (UK) for Codan Fleet (owned/leased) vehicles only. All other costs have been allocated to C1 Purchased Goods and Services and C6 Business Travel.
Scope 1 Refrigerants	Yes	Yes	
Scope 2 Purchased Electricity	Yes	Yes	Increased level of site-based data used in FY25, with only 3 sites requiring estimation-based method.
Scope 3 C1 – Purchased goods and services	Yes	Yes	In FY24, only a small selection of GL spend was reported. In FY25 the full GL expense was used.

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Category	Included in FY24	Included in FY25	Notes and key changes
Scope 3 C2 – Capital goods	Yes	Yes	FY24 data set utilised Codan's full capital asset value, not the additions/transfers which occurred in FY24, therefore the associated emissions where significantly over estimated. Due to this large discrepancy, C2 has been re-calculated for FY24.
Scope 3 C3 – Fuel-related and energy-related activities	Yes	Yes	
Scope 3 C4 – Upstream transportation and distribution	Yes	Yes	
Scope 3 C5 – Waste generated in operations	Yes	Yes	FY24 extrapolated for the portfolio based on two AU facilities data which was significantly over estimated. In FY25, waste data has been collected from all available facilities, including the largest production sites in the portfolio. No extrapolation has been applied given waste emissions are relatively insignificant portion of overall Scope 3 emissions.
Scope 3 C6 – Business travel	Yes	Yes	
Scope 3 C7 – Employee commuting	Yes	Yes	
Scope 3 C8 – Upstream leased assets	Yes	No	In FY24, some overseas facilities related energy use was reported in this category which are not relevant for this category. In FY25, emissions from all upstream leased assets have already been reported under scope 1 and 2 emissions.
Scope 3 C9 – Downstream transportation and distribution	Yes	Yes	
Scope 3 C10 – Processing of sold products	Yes	No	In FY24, contract manufacturing operations was reported in this category. This category should only include emissions from the processing of products sold by Codan that require processing by a third party. This is not the case with contract manufacturing. Contract manufacturing is the purchasing of manufacturing services from contractors which should be captured under C1. In FY25, emissions from contract manufacturing have been reported under C1 Purchased Goods and Services.
Scope 3 C11 – Use of sold products	Yes	Yes	Due to complexity of products and data availability, DTC products have not been reported in FY25.
Scope 3 C12 – End-of-life treatment of sold products	Yes	Yes	Due to complexity of products and data availability, DTC products have not been reported in FY25.
Scope 3 C13 – Downstream leased assets	No	No	Codan does not operate any downstream leased assets. Therefore, Scope 3 Category 13 (Downstream leased assets) is not applicable.
Scope 3 C14 – Franchises	No	No	Codan does not operate under a franchise model and does not have any franchised operations. Therefore, Scope 3 Category 14 (Franchises) is not applicable.
Scope 3 C15 – Investments	No	No	Codan has no subsidiaries, affiliated companies or interests in any companies beyond the organisational boundary.

ESG REPORT **ENVIRONMENT**

Emissions Footprint

Codan's total emissions footprint for FY25 across Scope 1, 2 and 3 is **58,883tCO2-e**.

Figure 1: Breakdown of GHG emissions by scope

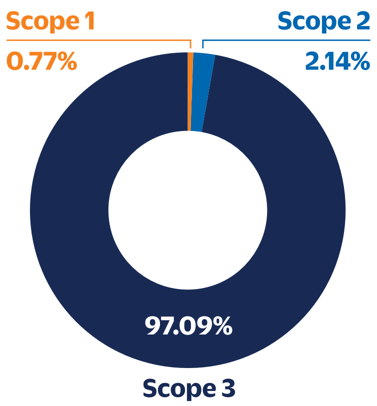
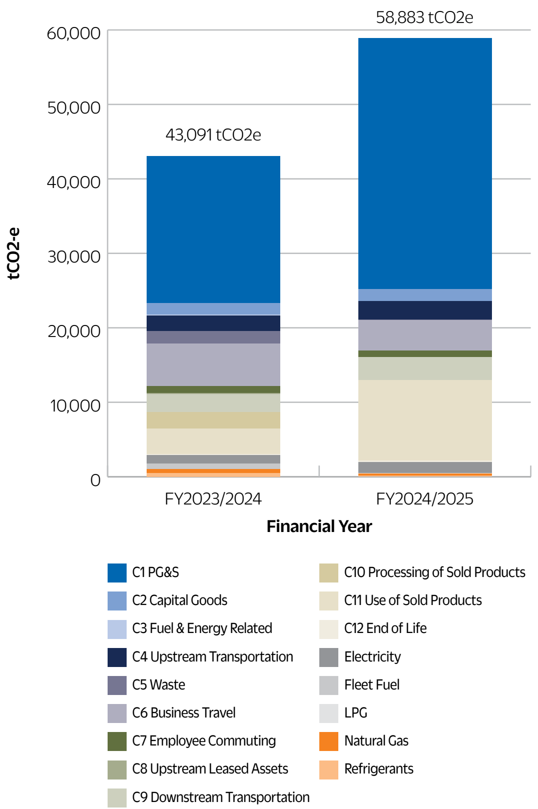


Table 3: Year on Year Total Emissions by scope

Emissions Scope	FY2025	FY2024
Scope 1	456 tCO2-e	1,489 tCO2-e
Scope 2	1,261 tCO2-e	1,038 tCO2-e
Scope 3	57,166 tCO2-e	40,564 tCO2-e
Total	**58,883 tCO2-e**	**43,091 tCO2-e**

Figure 2: Year on Year emissions breakdown by Category



Key Changes

Changes in reported scope 3 emissions are very common for businesses in early stages of their emissions reporting and management journey. See below for summary of key changes in each scope of emissions, as highlighted in Table 3.

In the FY24 Annual Report, Codan reported Total Emissions of 54,357 tCO2-e. This figure has since been revised to 43,091 tCO2-e, reflecting adjustments in Capital Goods expenditure and purchased goods and services as outlined in Scope 3 – Key Changes below. Due to time and resource constraints (primarily driven by preparations for mandatory FY26 reporting and the transition to the Recouple software platform) a full re-baseline of the FY24 GHG footprint has not been completed. Notably, FY24 has not been re-baselined for emissions associated with use of sold products. Where there have been changes in calculations to emissions between FY24 and FY25, the changes have been noted in this report.

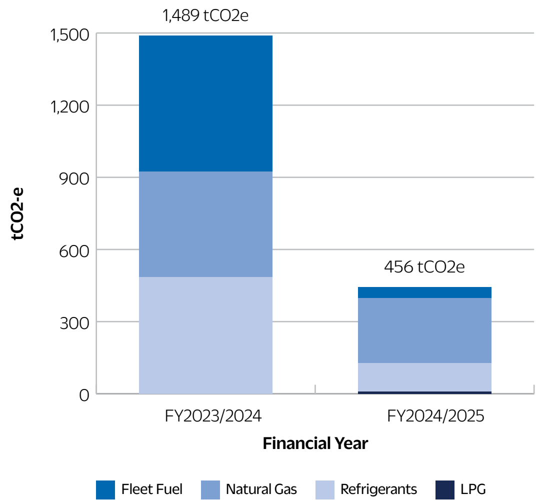
With each successive ESG report, Codan has enhanced the accuracy of its global carbon footprint assessment. The downside of the increased accuracy is that it makes year-on-year comparison of emissions difficult. It is expected that the adoption of the 2XE Recouple platform will enable more precise and consistent carbon accounting, which will facilitate more accurate year-on-year comparisons moving forward. However, as Codan's carbon accounting matures, we anticipate further refinements, including those driven by improved data quality and reduced reliance on estimation.

Scope 1 Emissions

Codan's FY25 Scope 1 emissions are **456tCO2-e**.

- Natural gas accounts for 270tCO2-e (59.21%)
- Refrigerants accounts for 128tCO2-e (28.07%)
- Fleet Fuel accounts for 45tCO2-e (9.87%)
- LPG accounts for 13tCO2-e (2.85%5%)

Figure 3: Scope 1 emissions by source



Key Changes

- Fleet Fuel - FY24 used all spend allocated to a specific accounting code. This accounting code captures both fuel purchases, vehicle repairs and maintenance and fuel reimbursements for staff owned vehicles. For FY25, the actual fuel volume (AU and US) and distance (UK) for Codan Fleet (owned/leased) vehicles only was included in the total amount. All other costs have been allocated to C1 Purchased Goods and Services and C6 Business Travel
- LPG consumption excluded in FY24 due to data availability. Through data capture improvements in FY25, LPG has been able to be quantified and included.
- Refrigerants – Significant decrease in refrigerant contribution. The high value in FY24 is understood to be attributed to a refrigerant leak which has been fixed and therefore a decrease in FY25 associated emissions.

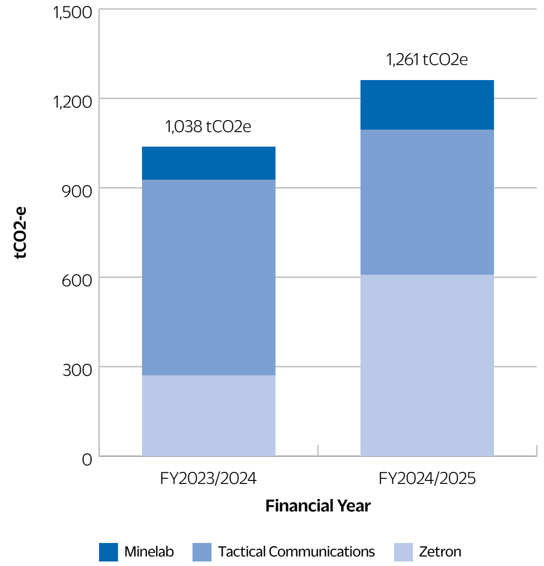
Calculation Methodology

Fuel – specific method - Fuel-specific emission calculations estimate emissions based on activity data that quantifies actual use whether that is volume, weight or distance. Each fuel source has a corresponding emissions factor specific to the vehicle type or 'stationary' use.

Scope 2 Emissions

Codan's FY25 across Scope 2 emissions are **1,261tCO2-e**. These emissions have been attributed to Codan's separate business units, though attribution is indicative only and further refinement of this attribution is necessary.

Figure 4: Scope 2 emissions by reporting group



Key Changes

Increased level of site-based data used in FY25, with only 3 sites requiring estimation-based method.

Calculation Methodology

Location based method was used where location-based emissions calculations estimate emissions from energy consumption based on the average emissions intensity of the energy network in a specific location or country. This method uses standard grid emission factors, reflecting the regional energy generation mix, without considering renewable energy purchases or supplier-specific factors.

ESG REPORT **ENVIRONMENT**

Scope 3 Emissions

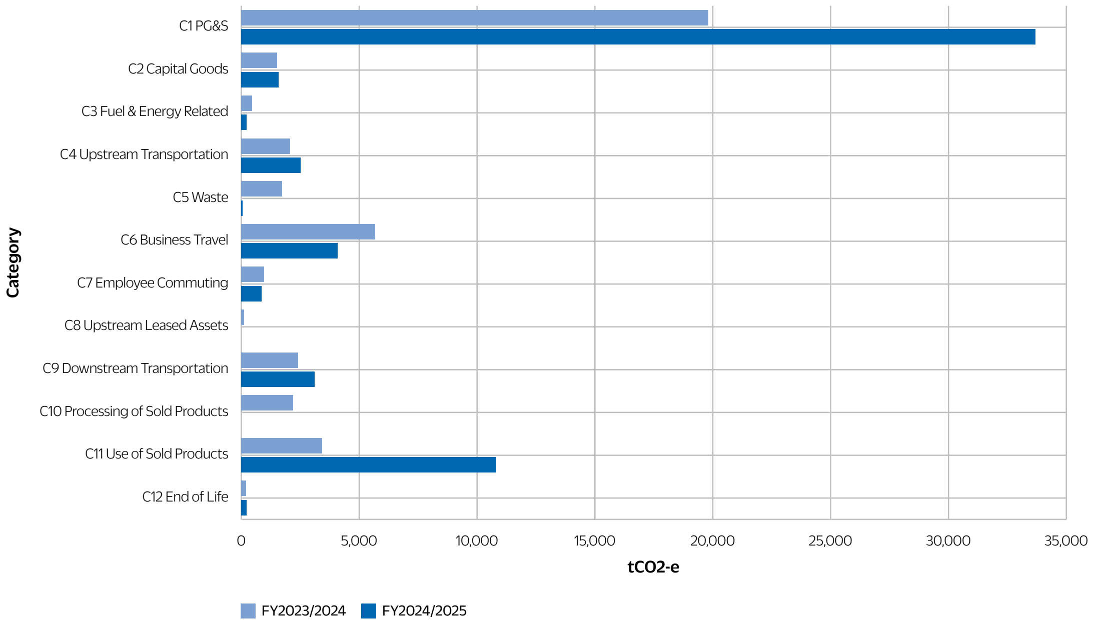
Table 4 below provides a summary of Codan's Scope 3 emissions as per the GHG Protocol reporting categories.

Table 4: Scope 3 emissions by GHG Protocol reporting category

GHG Protocol category	Scope 3 emissions
C1 Purchased Goods and Services	33,697 tCO2-e
C2 Capital Goods	1,580 tCO2-e
C3 Fuel-related and energy-related activities	230 tCO2-e
C4 Upstream transportation and distribution	2523 tCO2-e
C5 Waste generated in operations	48 tCO2-e
C6 Business Travel	4,088 tCO2-e
C7 Employee Commuting	865 tCO2-e
C9 Downstream transportation and distribution	3,103 tCO2-e
C11 Use of Sold Products	10,807 tCO2-e
C12 End-of Life treatment of sold products	225 tCO2-e
Total	**57,166 tCO2-e**

Figure 5 below shows the year-on-year difference per category.

Figure 5: Scope 3 year-on-year emissions difference per category



Key Changes

- Capital Goods (Scope 3 - C2) was recalculated for FY24 in FY25 as the data set utilised in FY24 was for Codan's full capital asset value (~$67mil), not the additions/transfers which occurred in FY24 ($10.12mil). FY24 had a previously disclosed value 12,416.8 tCO2-e and has a recalculated value of 1,510 tCO2-e.
- Purchased Goods and Services (Scope 3 - C1) - In FY24, only a small selection of General Ledger spend was reported. In FY25 the full General Ledger expense was used.
- Use of Sold Products (Scope 3 - C11) - FY24 included a very low number of product sales for Zetron (1,309 units) which form the basis of the calculations. FY25 uses the actual number of Zetron product sales for the MT-4, MT-5 and Cascade product lines (7,864 units).
- Processing of Sold Products (Scope 3 - C10) - In FY24, contract manufacturing operations was reported in this category. As this category applies to the additional processing of an intermediate product (i.e. that are produced by the Codan, that are sold and require further processing prior to sale), this is not the case for Codan products. In FY25, emissions from contract manufacturing have been reported under Purchased Goods and Serviced (Scope 3 - C1).

Calculation Methodology

Table 5 below outlines the key calculation methodology per category.

Table 5

Category	Sub-Category	Calculation Method
1 - Purchased goods and services	Spend	Spend-based
	Minelab & Zetron products	Average-data method
	Tactical products	Spend-based
	Contract manufacturing	Hybrid-method
2 - Capital goods		Spend-based
3 - Fuel-related and energy-related activities		Average-data method
4 - Upstream transportation and distribution		Spend-based
5 - Waste generated in operations		Waste-type-specific method
6 - Business travel	Air travel	Distance-based method
	Hotels, car hire and other travel	Spend-based
7 - Employee commuting		Average-data method
9 - Downstream transportation and distribution		Spend-based
11 - Use of sold products		Products that directly consume energy during use
12 - End-of-life treatment of sold products		Waste-type-specific method

ESG REPORT **ENVIRONMENT**

Opportunities to Reduce Emissions

The FY24 ESG Report stated that the following reduction opportunities were under consideration in the short term:

- installation of additional electric vehicle charging stations at the Mawson Lakes office;
- creation an Uber "Business Corporate Account" to utilise electric and low emission vehicles when on business travel;
- offset carbon emissions from airplane travel;
- use of renewable energy electricity packages for all offices;
- increase percentage of sea fright used compared to air freight; and
- use electric, hybrid or low carbon vehicles when replacing existing fleet vehicles.

Codan recognises the importance of implementing practical, near-term actions to reduce its environmental impact while preparing for long-term climate resilience. In FY25, Codan continued to pursue a range of operational efficiency initiatives aimed at reducing our carbon footprint. Many of the above short-term reduction opportunities have already been actioned or are actively progressing, forming a critical foundation for our broader emissions strategy.

Codan established an Uber for Business account to encourage the use of electric and low-emission vehicles for business travel. As a result, over 57% of Codan's Uber rides during FY25 were in electric or hybrid vehicles. To enhance this progress, Codan has updated its travel policy to require employees to select Uber Green where available. The installation of additional electric vehicle charging stations at our Mawson Lakes office is underway, with planning and approvals currently being finalised in coordination with the building owner. Codan also continued to prioritise sea freight over air freight where operationally feasible, reducing the emissions intensity of our logistics activities. Although no fleet vehicles were replaced in FY25, Codan maintains its commitment to transitioning to electric, hybrid, or other low-emission vehicles as fleet turnover occurs. Appropriate carbon offset options for air travel continue to be identified, with a focus on engaging trusted partners who provide credible, high-integrity outcomes. This remains a priority area for FY26.

Codan acknowledges that the majority of its emissions are Scope 3, stemming from upstream and downstream activities across our global value chain. These emissions present both a challenge and an opportunity. With the support of the GISA AIM Grant, Codan has commenced a project to assess embodied carbon in its products and identify circular economy interventions that can reduce lifecycle emissions. This work will continue into FY26 and is expected to yield valuable insights that inform our strategy to reduce Scope 3 emissions and drive further decarbonisation across our operations and supply chain.

In relation to DTC's UK operations, a carbon reduction plan was established in FY23 to meet stakeholder and regulatory expectations in the UK. The DTC carbon reduction plan was reviewed and updated in November 2024. Ongoing monitoring of the DTC carbon reduction plan will form part of Codan's overall monitoring of the implementation of emissions reduction actions across the group.

Ongoing Environmental Management

Codan's global head office is located in the Technology Park precinct of Mawson Lakes in South Australia, houses around 230 staff (**Head Office**) and has a 5 Star Nabers Energy Rating. The fit for purpose space is fitted with solar panels and electric vehicle charging stations providing free energy to staff. Codan maintains an effective Environmental Management System that is integral to business processes and accredited to AS/NZS ISO 14001 Environmental Management Systems.

Head Office solar panels produced 18547 kWh this year.

All waste produced by Head Office (including all business and production waste) totalled 60 MT. Head Office separates waste for collection by type including food waste and organics, E-waste, cardboard, batteries and secure documents. Six kg of printer toner was recycled.

Head Office had a total water consumption of 10,280 kl which was all taken from city water services.

DTC (UK) continues to purchase 100% renewable power.

In FY24, Codan introduced a new Environment and Biodiversity Policy which recognises the importance of biodiversity conservation and protection. Codan is monitoring the voluntary corporate reporting trends on nature and biodiversity risk and the uptake of the Taskforce on Nature Related Financial Disclosures (**TNFD**) Recommendations. As these reporting practices emerge, Codan will determine whether to commence voluntary reporting using the TNFD.

Codan is mindful of its indirect environmental impact within the supply chain. Codan's Supplier Code of Conduct encourages our suppliers to develop a more sustainable business by minimising their environmental impact. Codan's two largest contract manufacturers are both accredited with ISO 14001 Environmental Management Systems. Both contract manufacturers have confirmed their sites reported no environmental incidents for FY25.

Codan products are Restrictions on Hazardous Substances (**RoHS**) certified. The goal of RoHS is to reduce the environmental effect and health impact of electronics. The legislation's primary purpose is to make electronics manufacturing safer at every stage of an electronic device's life cycle. Codan products are also fitted with a Waste Electrical and Electronic Equipment (**WEEE**) Sticker which encourages consumers to dispose of the product thoughtfully when at the end of its life cycle.

ESG REPORT

SOCIAL

Our People

Core Values and Inclusive Culture

Our Core Values continue to be the cornerstone of Codan's culture across our global community. These values reflect our shared principles and are consistently reinforced across the employee lifecycle — from our Executive communications and performance review processes to our Reward & Recognition program and recruitment practices. They also guide how we welcome new employees joining Codan through acquisition, ensuring a sense of alignment and shared purpose from day one.

In FY25, we deepened the integration of these Values through initiatives that support a culture of respect, collaboration, and accountability. They remain central to how we lead, how we grow, and how we work together.

Employee Engagement

In April 2025, we conducted a company-wide Employee Engagement Survey to better understand how our people experience life at Codan. This survey follows significant business growth and integration of new acquisitions including Zetron UK, Wave Central, and Kägwerks which have brought our workforce to over 1,000 people globally.

We were pleased to achieve a strong 79% participation rate, demonstrating a high level of engagement and commitment from our workforce. Our overall engagement score was 71%, with 82% of employees indicating they would recommend Codan as a great place to work.

Key strengths highlighted in the survey included:

- Safety
- Inclusion
- Management and Work-Life Blend

At the same time, we acknowledged clear opportunities for growth in the areas of:

- Action on feedback
- Recognition
- Learning and Development

In response to the feedback for greater recognition and feedback, we have launched Codan's Global Reward and Recognition program. This program is designed to celebrate outstanding contributions, reinforce behaviours aligned with Codan values, and strengthen a culture of appreciation across the Group.

We remain dedicated to acting on the survey results at both group and local levels, with division-specific insights being shared with leaders and managers to co-design actionable, targeted improvement plans.

Safety and Wellbeing

At Codan, we are committed to creating a safe, healthy, and inclusive workplace for all employees and a positive safety culture is central to our approach. We actively encourage reporting of all safety-related events — including incidents, near misses, and hazards — to ensure timely intervention and continuous improvement.

To support this, we undertook a significant global Safety Project, which included delivery of manager risk assessment workshops, '5 Why's' root cause analysis and investigation training for selected managers, HR representatives, and safety reps, and in early FY26 we will launch an all-employee eLearning module on safety reporting.

Workplace Health & Safety Statistics	**FY25**	FY24	FY23
Lost Time Injuries	**1**	1	1
Near Misses	**3**	3	1
Incidents	**54**	49	15
Hazards	**2**	N/A	N/A
Fatalities	**0**	0	0

Wellbeing initiatives continued across all parts of the global business, one example of this program featured a Bingo Challenge game that encouraged wellbeing actions and engagement and saw high levels of interaction from employees.

Respectful Workplace Behaviour Workshops were held globally for managers and employees, with a focus of reinforcing Codan's values and expectations in building inclusive and respectful environments, and ensuring legislative compliance.

TRUST & INTEGRITY

HIGH PERFORMANCE

CUSTOMER DRIVEN

CAN-DO

ESG REPORT **SOCIAL**

Diversity, Equity and Inclusion (DEI)

As part of our ongoing commitment to fostering an inclusive and high-performing culture, FY25 marked the launch of our first global "Belonging Strategy" which was developed through in-depth consultation with employees and leaders across our global operations.

The Belonging Strategy outlines four core areas of focus:

- Enhancing connection, belonging, and inclusion across our global workforce;
- Building inclusive leadership capabilities;
- Embedding DEI principles into Codan's systems and processes;
- Improving measurement, accountability, and transparency.

The Belonging Strategy provides the roadmap for continued progress, aligning our culture, systems and leadership capability with our aspiration to build a workplace where all people can thrive.

As a global organisation experiencing growth and expansion into new markets and sectors, our focus remains on the long term. We are strengthening our policies, systems and programs so that they are sustainable and responsive to evolving business and workforce needs.

Gender representation	FY25 Female	FY25 Male	FY24 Female	FY24 Male
Board	**40%**	**60%**	40%	60%
Senior Executive	**17%**	**83%**	17%	83%
Senior Management	**18%**	**82%**	24%	76%
Other	**26%**	**74%**	26%	74%
Whole workforce	**26%**	**74%**	25%	75%

Learning and Development

Learning and development remain a key priority for Codan as we continue to build capability across our global workforce. In FY25, our cross-regional mentoring program was once again offered and received strong interest from both mentors and mentees. This initiative continues to foster meaningful professional relationships, encourage knowledge sharing, and support individual growth.

We also continued to invest in our Human Resources Information System (**HRIS**), which is playing an increasing role in delivering learning, performance, and talent outcomes. In FY25, our Learning Management System (**LMS**) began supporting the rollout of eLearning modules, further strengthening our digital learning capabilities. Development objectives have been reinforced through the performance module, and the recent launch of the talent module has enabled structured talent mapping and succession planning across Codan's divisions.

	FY25	FY24
Learning & Development ($000)	**934**	658

ESG REPORT **SOCIAL**

Our Community

Employing over 200 engineers across the Codan Group, STEM disciplines are central to our operations and future growth. To ensure a strong, diverse and inclusive talent pipeline, we remain committed to encouraging and supporting students of all backgrounds—regardless of gender, age, family status, culture, ethnicity, or religion—to pursue careers in science, technology, engineering and mathematics. In FY25, we expanded our community engagement through new sponsorships and partnerships that reflect our values. This includes support for the Yalari Indigenous education program, providing both annual funding for a cultural development camp and a long-term scholarship to Scotch College; continued sponsorship of the Adelaide University Solar Racing Team, which promotes sustainable engineering innovation; and renewed backing of the South Australian Science Excellence and Innovation Awards. We also joined the Committee for Adelaide and the American Chamber of Commerce in Australia to strengthen ties with the communities and regions in which we operate. Through these initiatives, Codan reinforces its commitment to education, diversity, and environmental responsibility, while helping to advance the technologies that shape a more sustainable future.

Committee for Adelaide and AMCHAM

Codan is a proud member of the Committee for Adelaide, a leading independent organisation focused on shaping a stronger, more inclusive future for South Australia. Through our involvement, Codan contributes to key conversations around economic development, innovation and community wellbeing. Membership allows us to collaborate with other businesses and civic leaders to help drive positive change and long-term prosperity within the state.

Codan is also a member of AmCham, Australia's largest international business organisation. Our membership provides a platform to engage with industry leaders, strengthen trade and investment ties, and contribute to policy discussions that shape the broader business environment. As an international company with strong links to the United States, Codan values the opportunity to deepen relationships and expand our presence in key global markets

Science Awards

Codan continued its sponsorship of the South Australian Science Excellence and Innovation Awards in FY25, reaffirming our commitment to recognising and promoting excellence in STEM. These awards celebrate the achievements of leading scientists, researchers, educators, and innovators whose work is advancing knowledge and driving progress across South Australia. By supporting the awards, Codan helps champion scientific discovery, inspire future generations, and strengthen the state's reputation as a hub for innovation and technological leadership.

Supporting Indigenous Education through Yalari

Yalari
Educating Indigenous Children

Codan is proud to support Yalari, a not-for-profit organisation that provides Indigenous children from regional and remote communities across Australia with the opportunity to receive a high-quality secondary education at leading Australian boarding schools. Founded on the belief that education is the key to generational change, Yalari empowers young Indigenous Australians through access to academic excellence, comprehensive pastoral care and culturally grounded support networks. The program not only delivers academic opportunity but also builds resilience, leadership and pride in cultural identity—equipping students to contribute meaningfully to their communities and beyond.

Year 9 Outback Camp Sponsorship

In FY25, Codan supported Yalari's Year 9 Boys Outback Camp. Approximately 16 students attended this immersive program in Central Australia, which plays a vital role in personal development during a formative stage in their schooling. The camp allows students to spend time on Country, strengthening their cultural identity while building relationships, teamwork, and leadership skills. It forms a key part of Yalari's unique pastoral care approach and provides a meaningful, life-shaping experience that connects students to their heritage and each other.

Long-Term Scholarship Commitment

In addition to annual camp support, Codan has committed to a multi-year scholarship, starting in 2026, to fully fund an Indigenous student to attend Scotch College in Adelaide. This long-term investment underscores our belief in the power of education to transform lives. The scholarship provides not only academic opportunity but also long-term mentoring and support, ensuring the student has every chance to succeed and thrive. By partnering with Yalari in this way, Codan is helping to build a more inclusive and equitable future—one student at a time.

Scholarships

Codan continues to support the Undergraduate STEM Scholarship for Women with the University of South Australia. Available to second year female students enrolled in a full-time or part-time eligible STEM undergraduate program, the scholarship is valued at up to $15,000 over three years. It also provides a paid work experience component to complement the financial assistance and extend the scholarships value by providing practical work based experience, mentoring, and a potential pathway to employment.

Codan supported the University of South Australia STEM Girls Academy Creative Challenge, which is based on the problem solving mindset "Design Thinking" and combines a series of steps which can guide you to think as a designer, sparking ideas that can lead to innovation. Through the STEM Girls Academy, students were presented with a challenge to innovate and design a solution to how Codan products could be used to enhance daily life in rural Australia. The solutions were featured in a temporary exhibit at Adelaide's Museum of Discovery and the exhibit opening facilitated the opportunity for the students, ambassadors and mentors to connect and exchange their experience.

Codan also continued to support the Codan Playford Trust honours scholarship. The $10,000 scholarship is awarded annually to an outstanding student commencing third year, fourth year or Honours in electronic engineering, signal processing or physics, with an interest in sensing systems. The successful applicant has the opportunity to undertake paid work experience at Codan. The aim is to help the student develop skills and knowledge and enhance their industry experience. The students will work on projects in a collaborative environment, actively contributing and drawing on the experience of others.

The Codan Founders PhD Scholarship through the University of Adelaide is in the process of awarding its first scholarship.

ESG REPORT **SOCIAL**

Being a socially conscious and responsible organisation is a part of Codan's corporate identity. Our mission is to target community programs that assist disadvantaged groups within the communities our businesses operate.

	FY25	FY24
Donations ($000) inclusive of product donations	**439**	387

Codan continues to be a proud major sponsor of Youth Opportunities. Youth Opportunities supports young people to develop the lifelong skills, habits and confidence to thrive. Through this sponsorship, Codan will provide 40 young people in Northern Adelaide the opportunity to participate in the Youth Opportunities Elevate Personal Leadership Pathway program, and award 2 Educational Scholarships. This wellbeing and leadership program offered to Year 10 students, will help them to develop the skills to overcome adversity, build resilience and optimism, and prepare for their future - while also providing access to opportunities which reduce barriers to achieving their potential.

Zetron is an active supporter of various charitable organizations and life-changing emergency response efforts around the world. In FY25, Zetron contributed more than $200k (USD) and thousands of employee volunteer hours to causes in many of the global geographic regions the company serves. Just a few highlighted examples from FY25 included:

- In September 2024, Zetron held its annual Shoot for the Stars charity golf and auction event, raising $50k (USD) for the Behind the Badge Foundation, which directly supports law enforcement agencies, families and communities of officers killed or seriously injured in the line of duty. In its 12-year run, Zetron's annual event has raised nearly half a million dollars for the organization.
- When Hurricane Helene hit the US east coast, destroying homes, businesses, and claiming many lives, emergency communications were crippled, complicating rescue and recovery efforts. Madison County, a rural area of North Carolina where a new countywide Zetron LMR network had been deployed, was heavily impacted and Zetron employees quickly engaged. In addition to sending transportable repeaters to help establish temporary first responder communications while their systems were down, Zetron engineers dispatched to the county to accelerate the restoration of communications and back in Zetron's US headquarters more than 2,600 miles away, employees launched a donation drive, sending household supplies, personal care items, and non-perishable food to the county.
- In November 2024, Zetron entered a new partnership with Crime Stoppers Global Solutions (**CSGS**), a nearly 50 year old citizen-driven crime prevention and reporting organization that began in the United States. Zetron's partnership and support last year enabled CSGS to expand its European operations into Serbia and the Balkans, where the organization played a key role in taking down a massive illegal human trafficking, drugs and weapons ring operating in multiple countries.

Codan is a long-time proud supporter of Variety - the Children's Charity (**Variety**). 2025 marks our 37th year of gold sponsorship of the Variety Bash, Australia's largest and longest running charity motoring event through the Australian outback. Codan participates in the event with its own Variety Bash vehicle and oversees the radio communications in the lead up to the event. In addition, Codan is responsible for manning the control centre to facilitate the communication and tracking of all official vehicles, mobile workshops and mobile doctors, for a safe and successful Variety Bash. Codan employees conduct site surveys ahead of the Variety Bash to ensure the remote site provides reliable communications along the Variety Bash route, as well as provide HF radio operator training, assist with radio installations and attend Variety Bash meetings.

Codan hosted its fifth annual charity golf day in South Australia, where key stakeholders were invited to register a team to participate in a fun filled day on the course. $120,000 (AUD) was raised inclusive of key stakeholder and Codan donations, and this amount was donated and distributed evenly amongst three chosen charities, namely: Variety, Hutt St Centre and KickStart for Kids.

In FY25, Codan continued its support to Catherine House, South Australia's only homelessness and recovery service for women. Catherine House provides crisis and long term accommodation, mental health programs, access to education and employment opportunities and other support services to women experiencing homelessness in the state.

Minelab Clean Sweep

In March 2025, Minelab launched its "Clean Sweep" campaign, promoting responsible metal detecting practices and environmental stewardship within the global detecting community. The campaign encouraged users to leave detecting sites cleaner than they found them by removing litter and disposing of waste responsibly. Through educational content, community engagement, and on-the-ground clean-up initiatives, Clean Sweep reinforced Minelab's commitment to sustainability and protecting the natural environments where its products are used. The campaign reflects Codan's broader values of environmental responsibility and community-minded innovation.

ESG REPORT

GOVERNANCE

Corporate Governance Statement

Codan's corporate governance statement, which was approved by the Codan Board on 20 August 2025, is available on the company's website and may be accessed at https://codan.com.au/who-is-codan/corporate-governance/.

Business Ethics / Behaviour

Codan's Code of Conduct provides a framework for employee conduct, with guidance around expected and acceptable standards of behaviour that are aligned with our Core Values, and which allow us to work together to achieve the goals of the business. The Code of Conduct and Core Values are included in induction packs for new starters.

An essential part of our culture of "Trust & Integrity", one of Codan's four Core Values, is underpinned by our "Speak Up" culture. This culture encourages staff to raise issues or conduct that concerns them. Our "Speak Up" culture is reinforced by our Code of Conduct, Core Values and Whistleblower Protection Policy. We take all reports of harassment, discrimination, bullying and any form of misconduct very seriously. Our grievance procedure facilitates the appropriate investigation and resolution of complaints. There were six (6) workplace grievances registered globally during FY25. All reports/grievances were investigated in line with Company policy framework(s) and were resolved and closed out with relevant parties. No further disputes or objections were raised.

At Codan, we take compliance seriously. We have a strong, fit for purpose compliance program run by our in house Legal & Compliance department. Staff training is a critical part of this program and is compulsory for all employees and forms part of our induction program.

This induction includes training on Anti-Bribery and Anti-Corruption (**ABAC**), Modern Slavery, Continuous Disclosure, Share Trading, Whistleblower Protection and Code of Conduct. Our training program is risk-appropriate, with additional tailored training sessions conducted for staff in high-risk roles.

ABAC remains a material topic for our business, as we acknowledge some of our businesses operate in high-risk environments. Our ABAC program and ABAC Policy is reviewed annually to ensure it remains fit for purpose and in line with best practice anti-bribery compliance programs. Key aspects of the program involve a risk driven due diligence process for third party business partners, regular training for high-risk staff and a selection of third parties, and an approval based gratuities register. Internal audits are conducted on high-risk transactions each year.

Codan's sanctions compliance program is a groupwide approach that uses enhanced due diligence measures, external resources, monitoring and approval procedures to ensure we meet our global sanctions obligations.

Codan's modern slavery program is continually reviewed in line with our Modern Slavery and Human Rights Policy. Codan has continued its membership with the UNGC's Modern Slavery Communities of Practice, which allows discussions across different industries and organisation size, to share ideas in the pursuit of best practice. Codan produces an annual Modern Slavery Statement designed to meet the disclosure requirements of the Australian Modern Slavery Act 2018 (Cth). Codan remains committed to identifying modern slavery risks in its third-party manufacturing and supply network through regular risk assessments and oversight mechanisms. Codan's Modern Slavery Statement can be found here : https://codan.com.au/wp-content/uploads/2025/02/CDA-Modern-Slavery-Statement-FY24.pdf.

Codan's supply and procurement team are in regular contact with its manufacturers and suppliers. Codan is actively engaged in maintaining an established network that supports transparency and continuous improvement around their approaches to identifying and mitigating modern slavery risk. In FY25, Codan's Chief Operating Officer, Supply Chain Manager, Procurement Officer, and Legal Counsel visited multiple third-party supply and manufacturing sites to conduct in person modern slavery audits.

These audits provide first-hand insights into the conduct of our third-party suppliers and manufacturers, allowing us to gauge their understanding, commitment and ongoing efforts with respect to modern slavery compliance.

We have a Supplier Code of Conduct and Supplier Terms and Conditions that include Modern Slavery clauses. The Supplier Code of Conduct now includes requirements for suppliers to abide by Codan's Conflict Mineral Policy and comply with the International Labour Organisation (**ILO**) Declaration on Fundamental Principles and Rights at work.
We have systems in place to carry out daily online searches on our highest risk suppliers for any adverse media, including modern slavery topics, and to date we have had no adverse "hits". Codan is not aware of any supplier non-compliance with social expectations or any contractor fatalities in FY25.

	FY26 Target	**FY25 Actual**	FY24
ABAC Policy violations	NIL	**NIL**	NIL
ABAC Internal audits	2	**2**	2
Sanction breaches and fines	NIL	**NIL**	NIL
Modern Slavery breaches	NIL	**NIL**	NIL

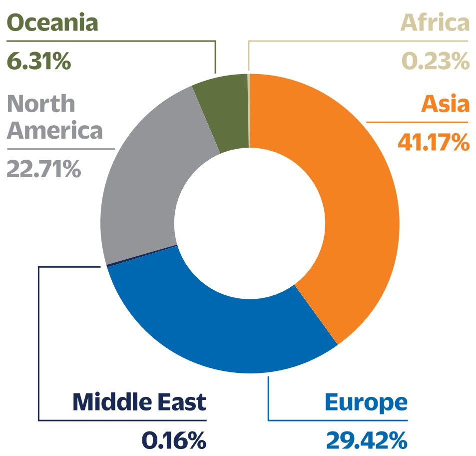
ESG REPORT **GOVERNANCE**

Our Supply Chain

Codan has an extensive global supply chain in place, sourcing product and material from most regions in the world. We partner with suppliers who meet stringent quality standards, are innovative and work in safe and responsible ways. Our dealings with our suppliers reflect Codan's core values, and as such, we have built collaborative, honest and trusting relationships which have resulted in reliable supply over the long term.

Our supply chain is responsive to the changing needs of our customers and markets. All Codan suppliers must provide agility, flexibility and speed to market. At the end of our supply chain are global distribution centres located in the UAE, USA, Malaysia, Poland, Brazil, Mexico, India and Australia, which ensure product is regionally distributed for the fastest route to market.

Codan Group supplier spend per region



1,000 active suppliers across the Codan Group, with supplier spend circa $213 million across mostly electronic components, as well as cables, antennas, plastics and packaging.

Cyber Security

As a global technology company, safeguarding our intellectual property and confidential information is paramount to maintaining trust with our customers, suppliers and partners. As the probability of cyber-attacks increase and become more complex, Codan has adopted a risk-based framework to protect our assets along with general alignment with ASD Essential 8. Cyber risks are regularly reported to the Codan Board and Audit and Risk Committee. Relevant organisational policies and standard operating procedures are in place and are regularly reviewed to ensure they remain commensurate with the external risk.

During FY25 Codan completed penetration testing and regular vulnerability assessments to highlight potential system vulnerabilities. Continued staff awareness training was completed by all employees.

In FY25, Codan had no known major security incidents.

Tax

As part of our commitment to meeting our global taxation obligations in a transparent and open manner, we conduct our tax affairs within a robust tax risk management policy and framework overseen by the board.

Codan's tax governance process is documented in our Tax Risk Management Policy and Framework. This framework is based on the philosophy of managing tax risk through a well-planned approach built around the following principles:

- A transparent and accountable relationship with local country tax authorities;
- The payment of the legally correct amount of tax in a timely manner;
- The systematic identification of significant tax sensitive transactions ahead of time;
- The documentation of tax processes to facilitate review and minimise the impact of changes in personnel;
- Defined channels for the reporting of tax information to the board;
- Internal controls, with effectiveness of those controls assessed on a regular basis;
- Codan should not enter any transaction where there is a material risk that any legislative general anti-avoidance provisions will be applied by a Court; and
- Codan will not promote tax exploitation schemes.

The board has delegated oversight of Codan's taxation affairs and the framework to the Audit and Risk Committee (**ARC**). The framework requires ARC to attest to the board on a yearly basis that it has effective policies and processes in place to manage tax risk.

The Chief Financial Officer has overall responsibility for the group's taxation affairs, including enforcing policies and implementing strategies approved by the board, developing and implementing systems that identify, assess, manage and monitor tax risks, monitoring the appropriateness, adequacy and effectiveness of tax risk management systems and reporting on tax risk and management thereof to the board. The Chief Financial Officer is also responsible for the maintenance of in-house tax resources with appropriate qualifications and experience in taxation matters, to oversee that Codan's obligations globally are discharged in a legally correct and timely basis and that the tax risk management controls set out in the framework operate in an effective and robust manner.

The framework requires management to consult with reputable local country external tax advisors where appropriate to ensure compliance with local country obligations. KPMG is engaged to review the numbers disclosed in the Tax Note in the Annual Report each year, as part of the half-year review and full-year audit. We apply arms'-length principles to our international related party dealings, engaging with external advisors with appropriate expertise to ensure our compliance with transfer pricing laws globally.

As part of our commitment to our tax risk management policy and framework, we adopted the recommendations of the Board of Taxation's Tax Transparency Code with effect from June 30, 2021. To this end, the board has directed that each year the Annual Report should contain sufficient information to comply with Part A of the Code. The Part A disclosures required of Codan by the Code are:

- Codan's Australian and Global effective tax rates;
- a reconciliation of the accounting profit to income tax expense;
- a reconciliation from income tax expense to current year income tax payable; and
- identification of material temporary and non-temporary differences.

The Part A financial information can be found in the Taxation Note (Note 7) of the Notes to the Financial Report on page 96 of this Annual Report. As Codan's business has continued to diversify, and in line with the success of our communications business, the activities and assets which generate our income have become more balanced and spread across the globe. In FY2025, we paid $10.6 million corporate income tax in Australia which is just over 40% of our global corporate income tax contribution. Our shareholders continue to benefit from the generation of Australian franking credits from Australian tax paid.

CODAN

GLOBAL REPORTING INITIATIVE (GRI) CONTENT INDEX

Statement of use: Codan Limited has reported the information cited in this GRI content index for the period 01 July 2024 to 30 June 2025 with reference to the GRI Standards.

GRI 1 used: GRI 1: Foundation 2021

GRI STANDARD	DISCLOSURE	LOCATION
GRI 2: General Disclosures 2021	2-1 Organizational details	Codan Limited
	2-2 Entities included in the organization's sustainability reporting	Annual Report > Financial Statements Note 22 Group Entities page 105
	2-3 Reporting period, frequency and contact point	Annual Report > ESG Report > About this report section page 25
	2-4 Restatements of information	Not applicable
	2-5 External assurance	Annual Report > ESG Report > About this report section page 25
	2-6 Activities, value chain and other business relationships	Annual Report > Financial Statements Note 2 Segment Activities page 92 Modern Slavery Statement accessible https://codan.com.au/who-is-codan/corporate-governance/
	2-9 Governance structure and composition	Annual Report > ESG Report > Corporate Governance Statement page 50
	2-10 Nomination and selection of the highest governance body	Annual Report > ESG Report > Corporate Governance Statement page 50
	2-11 Chair of the highest governance body	Annual Report > ESG Report > Corporate Governance Statement page 50
	2-19 Remuneration policies	Annual Report > Remuneration Report - Audited pages 61 - 76
	2-20 Process to determine remuneration	Annual Report > Remuneration Report - Audited pages 61 - 76
	2-26 Mechanisms for seeking advice and raising concerns	Annual Report > ESG Report > Business Ethics / Behaviour section page 50
	2-27 Compliance with laws and regulations	Annual Report > ESG Report > Corporate Governance Statement page 50
	2-28 Membership associations	During FY25, Codan Group employees held board positions on the following industry associations: Director, Export Council of Australia
	2-29 Approach to stakeholder engagement	Annual Report > ESG Report > About this report section page 25
	2-30 Collective bargaining agreements	Not applicable

GLOBAL REPORTING INITIATIVE (GRI) CONTENT INDEX

(continued)

GRI STANDARD	DISCLOSURE	LOCATION
GRI 3: Material Topics 2021	3-1 Process to determine material topics	Annual Report > ESG Report > About this report section page 25
	3-2 List of material topics	Annual Report > ESG Report > About this report section page 25
	3-3 Management of material topics	Annual Report > ESG Report > About this report section page 25
GRI 205: Anti-corruption 2016	205-1 Operations assessed for risks related to corruption	Annual Report > ESG Report > Business Ethics / Behaviour section page 50
	205-2 Communication and training about anti-corruption policies and procedures	Annual Report > ESG Report > Business Ethics / Behaviour section page 50
	205-3 Confirmed incidents of corruption and actions taken	Annual Report > ESG Report > Business Ethics / Behaviour section page 50
GRI 302: Energy 2016	302-1 Energy consumption within the organization	Annual Report > ESG Report > Environment section pages 26 - 41
	302-2 Energy consumption outside of the organization	Annual Report > ESG Report > Environment section pages 26 - 41
	302-3 Energy intensity	Annual Report > ESG Report > Environment section pages 26 - 41
	302-4 Reduction of energy consumption	Annual Report > ESG Report > Environment section pages 26 - 41
	302-5 Reductions in energy requirements of products and services	Annual Report > ESG Report > Environment section pages 26 - 41
GRI 305: Emissions 2016	305-1 Direct (Scope 1) GHG emissions	Annual Report > ESG Report > Environment section pages 26 - 41
	305-2 Energy indirect (Scope 2) GHG emissions	Annual Report > ESG Report > Environment section pages 26 - 41
	305-3 Other indirect (Scope 3) GHG emissions	Annual Report > ESG Report > Environment section pages 26 - 41
	305-4 GHG emissions intensity	Annual Report > ESG Report > Environment section pages 26 - 41
	305-5 Reduction of GHG emissions	Annual Report > ESG Report > Environment section pages 26 - 41
	305-6 Emissions of ozone-depleting substances (ODS)	Not disclosed
	305-7 Nitrogen oxides (NOx), sulfur oxides (SOx), and other significant air emissions	Not disclosed