

Code of Conduct Policy

This Code of Conduct for Decmil (inclusive of all subsidiary companies of Decmil Group Limited, collectively referred to in this Policy as Decmil) sets out the principles, practices and standards of personal conduct expected of everyone who works for Decmil. Our Code of Conduct should be adopted in all business activities, and it should be used as a guide to determine what we do and how we do it. As a minimum, Decmil complies with all applicable laws in the jurisdiction in which it is operating. The Code comprises principles that apply to various aspects of our working environment, including how we interact with colleagues, and how we engage third parties to perform work for us or to represent us.

Working Together:

- **Health, Safety & Environment:** We know that a safe and healthy working environment for Decmil personnel working at a Decmil site is crucial to the continuing success of our business
- **Employment Equality:** We are committed to providing equal opportunities in all aspects of employment
- **Harassment & Bullying:** We are committed to a safe and fair working environment, which is free from offensive, humiliating or intimidating behaviour

Ethical Business Practices:

- **Bribery and Corruption:** We conduct our business activities with integrity. We do not participate in Bribery or Corruption in any form, whether direct or indirect, in either the private or public sector
- **Gifts and Entertainment:** We do not give or receive Gifts or Entertainment which go beyond common courtesies or which could be perceived as compromising a person's objectivity
- **Conflicts of Interest:** We ensure that our personal interests do not conflict with the interests of Decmil
- **Insider Trading:** We do not use material information that is not generally available to the public for the purposes of share trading
- **Anti-Competitive Conduct:** We promote fair and open competition in the markets in which we operate

Use of Assets & Resources:

- **Use and Protection of Personal Information:** We treat all personal information as confidential
- **Financial Controls & Record Keeping:** We maintain appropriate financial controls to ensure the integrity of our accounts, keep records, and adopt reporting practices that are correct and complete
- **Protection of Assets:** We protect the assets of Decmil and ensure that they are used properly and for legitimate business purposes only
- **Use of Technology:** We use our IT systems responsibly

Engagement of Third Parties:

- **Relationships with Third Parties:** We act with integrity, transparency, respect and professionalism in all our dealings with Third Parties, to promote mutually beneficial relationships
- **Media and Public Disclosures:** We communicate honestly, accurately and in a timely manner
- **Sponsorship and Donations:** We support charities and community groups through ethical sponsorships and donations



This Code is supported by the Code of Conduct Charter, which provides an explanation of and practical implications for what we must do and what we must not do, with examples to illustrate how the principles can apply in specific situations.

This Policy was approved by the Decmil Group Limited Board on 26 July 2022.

Andrew Barclay
Chairman