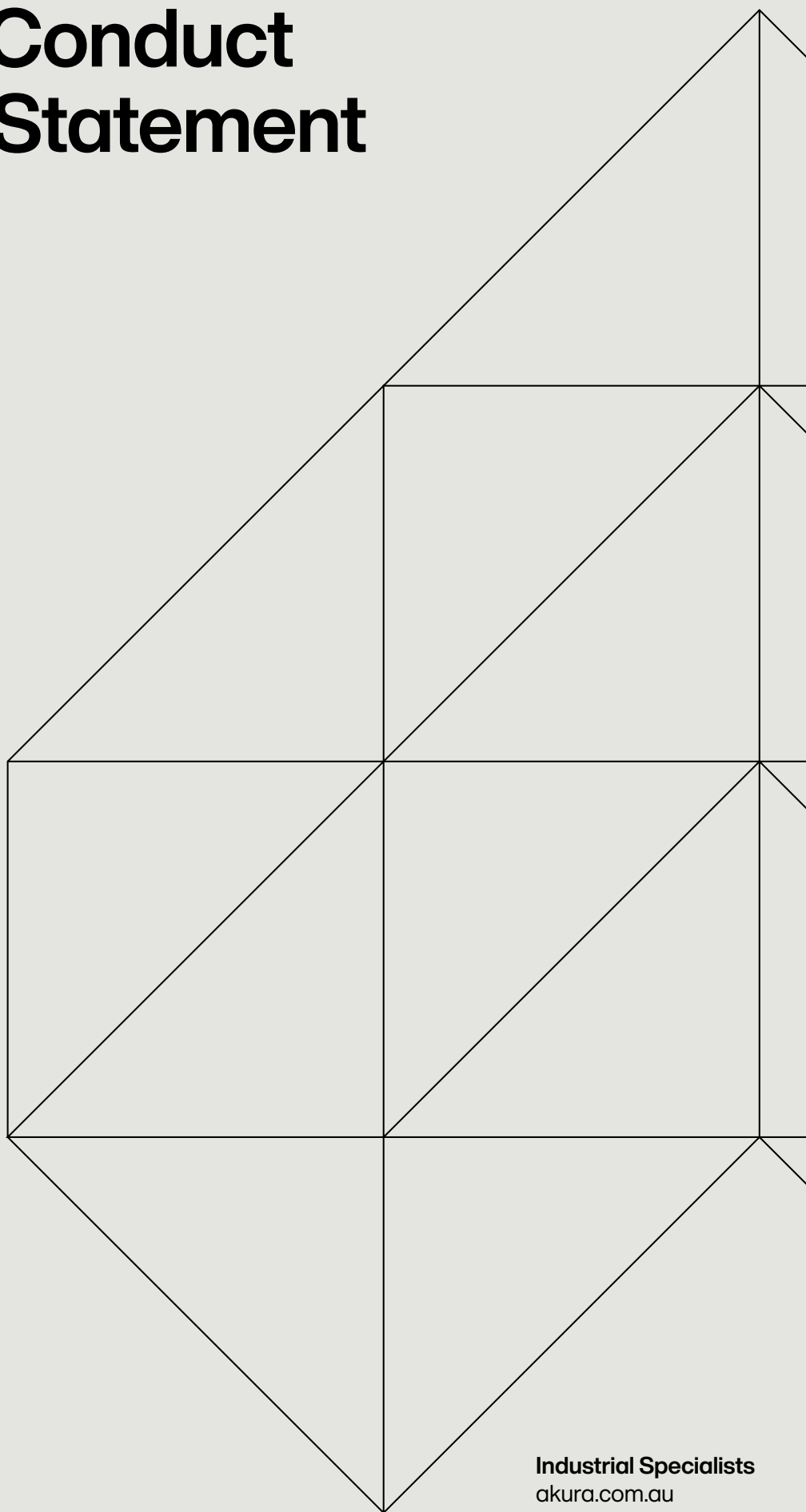


Version 1.0

Code of Conduct & Ethics Statement



Akura

Industrial Specialists
akura.com.au

This Code outlines what we expect of our employees. It describes the standards of behaviour to be followed in everything they do. The behaviours outlined in this Code are not optional. Akura is committed to the highest standards of ethics, respect and integrity and we expect our people to share the same values and collective purpose.

What is the Code of Conduct and Ethics?

Akura is committed to complying with applicable laws and regulations and conducting our business with the highest standards of ethics and integrity. This Code sets out the standards of behaviour that are required of our people - what they do and the way they do it. It is not an exhaustive list of policies and procedures - they are required to understand and comply with additional policies and procedures not detailed in this Code. This Code is designed to show how we make the right choices and is consistent with the values and principles contained in The Ten Principles of the UN Global Compact.

Why do we need a Code of Conduct and Ethics?

To describe the behaviours expected of our people and how they relate to Akura's Purpose and Values.

Who does the Code of Conduct and Ethics apply to?

This Code applies to Akura's employees, irrespective of role or title, full-time or part-time, directly employed or contracted. It is also applicable to contractors, suppliers, consultants and all other people who represent Akura or undertake work on behalf of Akura.

How does Akura comply with the Code of Conduct and Ethics?

Our Purpose is to create spaces where our clients can grow and succeed. We want to build a company that is loved by the people who work in it. Based on our unique approach to building values-based partnerships, we want to exceed our customer expectations through our speed of delivery and high quality of their projects that are build to last.

Our Values are truly lived and reflected in the way we work and conduct ourselves as representatives of Akura.

Teamwork

- We all own safety and are here to protect each other
- We communicate, collaborate and win together
- We support teammates and lend a hand when needed
- We appreciate that everyone counts

We get it done

- We have a can-do attitude
- We take accountability
- We rise to the challenge
- We approach everything with positive thinking and a solutions focused mindset

Be reliable

- We are consistent
- We do what we say
- We are trusted

Driven to improve

- We challenge the status quo (The Akura Way)
- We are market leaders in our speed of execution
- We do it smarter

Deliver quality

- We have pride in what we do
- We go the extra mile
- We are worthy of our brand
- The standard we walk past, is the standard we accept



Our Expectations of Our People

Compliance with the law and our policies and procedures

Akura's operations are conducted in compliance with applicable laws and regulations in the jurisdictions in which the operations and activities are being undertaken. All Akura employees must make themselves familiar with and act in accordance with the requirements of the Akura policies and procedures relevant to their positions.

Fraud, corruption and bribery

Fraud is any dishonest activity that causes actual or potential financial loss to any person or entity.

Corrupt behaviour refers to conduct that lacks virtue or integrity, including usage or attempts to use one's position for personal advantage.

Bribery includes the offering, promising, giving, accepting or soliciting of any fee, gift, reward or other advantage as an inducement to do something in connection with Akura's business that is illegal, unethical or a breach of trust. It includes the giving or receiving (either indirectly or directly) of anything of value that seeks to influence a person's actions or decisions, or to gain or retain a business advantage.

Failing to appropriately manage fraudulent and corrupt behaviour, including bribery, can affect Akura's and our clients' assets and reputation. Our employees have two key obligations:

- they must not engage in bribery or any other corrupt or fraudulent behaviour: and
- if they witness any Akura person or people engaging in any behaviour that is unlawful, improper, unethical or criminal in nature it must be reported*.

**The reporting process is outlined in the Akura Whistleblower Policy.*

Protect company and client assets

Our people are responsible for taking all prudent steps to ensure the protection of Akura's assets and resources and, as a trusted provider of building services and solutions, to protect the assets of customers and building owners for whom we have responsibility.

In particular, we:

- ensure that Akura's assets and resources are used only for the purposes of performing Akura's business, and in accordance with appropriate authorisations;
- ensure that where we have control over our clients' assets and resources, these are used only in accordance with appropriate authorisations; and
- take care to minimise the possibility of theft or misappropriation of Akura's and our clients' assets and resources by any person.

Actual, perceived or potential conflicts of interest

It is important that our people are alert to potential conflicts of interest. Specifically,

- they must not use their position, or opportunities arising from their position, nor take advantage of any property or information of Akura or its customers or clients, for personal gain (directly or indirectly) or to cause detriment to Akura or to our customers or clients;
- they must not enter into any arrangement or participate in any activity that would actually or potentially conflict with Akura's best interests or that would be likely to negatively affect Akura's reputation;
- they must not engage directly or indirectly in any outside business activity involving commercial contracts with, or work for the benefit of, third parties with whom Akura has entered into a commercial contract, without the prior written consent of designated Company authorities;
- they are required to disclose to their manager and/or a Director, close personal relationships with other employees where there are direct reporting lines, or where there are real or possible conflicts between roles and responsibilities; and
- they must communicate openly with their manager and a Director if a potential conflict of interest arises.



Exercise caution about accepting and offering gifts, private or personal works or hospitality

Gifts, personal works or services, hospitality or similar types of gratuities, can only be accepted or offered by our people in circumstances that do not create a real or perceived obligation for Akura or our people. The acceptance or offering of such gratuities will not inappropriately influence, or attempt to influence, an existing or future business relationship with Akura, the provider, recipient or the organisation they represent.

Respect and encourage diversity and inclusion

Consistent with Akura's Purpose and Core Values, we must always maintain respectful relationships and treat others with the same respect with which we would expect to be treated. This includes our people, clients, contractors and all stakeholders. We insist staff are respectful at all times.

Diversity in all its forms, is integral to our business and culture. Akura does not tolerate any forms of discrimination, harassment, bullying, or any other unlawful or anti-social behaviour. We will act promptly on any complaints. Akura is committed to providing an inclusive and diverse workplace and recognises the cultural, social and commercial benefits from doing so.

Above entitlement payments/services, right to freedom of association

Akura or any of its people are prohibited from exerting undue pressure on its contractors to make payments or benefits above the amount or value of a payment, or benefit, required to be paid under an industrial instrument, law, award or enterprise agreement i.e. an above-entitlement payment.

Akura or any of its people are prohibited from exerting any undue pressure on its contractors to support the products, goods, services (or other arrangements) provided by any particular service providers e.g. life insurance, income protection, superannuation products or training services provided by any unions or industrial organisations.

Akura's Code of Conduct and Ethics Akura complies with freedom of association laws, allowing our people and contractors the right to choose whether to join, not join, leave, or be represented by a union, employer association or other building associations. Akura or its employees shall not attempt to exert any undue influence or pressure over these decisions.

Privacy, mental health, domestic and family violence

Akura is committed to providing support and the required privacy for its employees who may be suffering from, or experiencing mental health, domestic, or family violence issues. Akura will provide employees the flexibility and access to professional support services required to assist in overcoming these issues.

Employees in need of such services can refer to the support mechanisms offered in the Akura Employee Assistance Program, the Akura Whistleblower Policy, or other industry and community support services, such as Lifeline Australia.

Non-Disclosure and client confidentiality

Akura employees abide by the requirements of any non-disclosure agreements that they may be subject to.

Sensitive and confidential client, corporate or personal information is treated with respect and is not disclosed without the authority of the relevant client or a relevant Akura representative.



Safety, ethics, human rights, sustainability

Akura is committed to providing a safe, healthy, sustainable and ethical workplace for its employees and contractors. Employees, contractors and suppliers are expected to work in accordance with the various policies, plans, procedures, standards, contracts, and other guidelines contained within the Akura integrated management system.

As part of this commitment, Akura expects that all decisions made by its employees will take into consideration the safest, most sustainable and most ethical solutions available to achieve our purpose.

Such considerations should include, but are not limited to:

- the safety, compliance and environmental performance of our suppliers;
- the most efficient use of resources for our projects (including energy and water);
- an ability where possible to monitor and account for the use of those resources;
- the ability to recycle existing and end of use materials;
- the ethical and human rights risks that may exist within a particular products' manufacture;
- the ethical and human rights risks that may exist within the labour component of trade packages that we engage.

Akura is a mandatory reporting entity under the Modern Slavery Act 2018 (Commonwealth) and as such provide an annual Modern Slavery Statement to the Federal Government.

No unauthorised media contact, social media posts or political donations

Communications with traditional media must be approved by the Akura Marketing Director prior to any engagement. No Akura employee is permitted to talk to the media without proper authority.

No content will be posted that may compromise the safety, security, integrity or privacy of Akura or any of its people, clients or associates.

No Akura employee is permitted to make donations to any political parties, lobby groups, industrial, trade, employment associations, etc. on Akura's behalf, without the prior and proper authority of the Chief Operating Office or Chief Financial Officer.

How will Code compliance be monitored?

Reporting / Monitoring / Protection

Certain kinds of unacceptable work-related behaviour can be very serious and can cause physical and mental harm to our people and great harm to the reputation, commercial interests and culture of Akura and our clients.

You must immediately report any circumstances which may involve a breach of this Code to your manager and/or a Director. Akura will maintain appropriate levels of confidentiality and ensure suitable protections for any of our people who make a report in relation to this Code. More information and details concerning our reporting reasons, mechanisms and protections, can be found in the Akura Whistleblower Policy.

Examples of unacceptable work-related behaviour include, but are not limited to:

- activities which seek to defraud or intentionally mislead other people or Akura;
- using Akura equipment and facilities for a business outside of Akura;
- carrying out duties in an unsafe or inappropriate manner that causes risk or reduces the ability of others to carry out their duties; or
- unlawful or unethical behaviour, or behaviour that is in breach of this Code.

Consequences of non-compliance/breach of Akura policies or unlawful conduct.

Breaches of applicable laws, rules, regulations, accepted ethical standards, Akura Policies or other aspects of this Code may result in disciplinary action. In serious cases, this may include the termination of employment or engagement.

Breach of applicable laws or regulations may also result in prosecution by the appropriate authorities. Akura will not pay, directly or indirectly, any penalties imposed on any of our people as a result of a breach of law or regulation.



