



Excellence in Pre-Fabricated Solutions
for Mission Critical Facilities.

Code of Conduct Policy.

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1. Introduction

1.1 Background

Parratech Group Pty Ltd ("we", "our", or "us") is committed to instilling and continually reinforcing a culture across the organisation of acting lawfully, ethically and responsibly. We expect you to be familiar with our values and commit to meeting the standards required of you. These standards go beyond mere compliance with laws and regulations.

The standards embrace the values of Keeping it Real, Having Grit, Doing it Right and Caring about People, which are essential to our continued success and involve acting with honesty, integrity and in a manner that is consistent with the reasonable expectations of the broader community.

It includes being and being seen to be, a 'good corporate citizen', for example by:

- acting with respect for human rights;
- creating a safe and non-discriminatory workplace;
- dealing honestly and fairly with suppliers and customers;
- acting responsibly towards the environment; and
- only dealing with business partners who demonstrate similar ethical and responsible business practices.

This Code of Conduct Policy ("Code") applies to anyone employed or engaged by us or any of our related entities (including our New Zealand entity and any other entity we operate outside Australia), including employees (whether permanent, fixed-term or temporary), contractors, secondees, management, agents and directors ("you"). You are required to familiarise yourself with and act in accordance with the Code in all activities undertaken during or in connection with your employment or engagement.

Contravening the Code may be considered misconduct and may result in disciplinary action up to and including the termination of your employment or other engagement with us.

1.2 Purpose

This Code sets out the standards of conduct we expect of you.

The Code requires you to adhere to the law and our policies, as amended from time to time. The standards set out in this Code cannot, and do not try to, anticipate every situation which may raise a legal, ethical or moral issue.

You are expected to exercise sound judgment when evaluating an issue of business conduct. If you are in any doubt, you should seek advice before acting.

2. Code of Conduct

2.1 Our Ethical Behaviour Expectations

Our reputation as a good corporate citizen will be achieved and maintained in all our dealings with the Company's customers, suppliers, competitors and colleagues.

You must conduct yourself lawfully and with openness, honesty, fairness and integrity.

This means that you must, during or in connection with your employment or engagement with us:

- (a) act in accordance with our stated values;
- (b) comply with all relevant laws and regulations, including but not limited to the criminal law, overseas laws where applicable and laws that regulate competition and consumer protection, protection of the environment, workplace health and safety, anti-bribery and corruption and tax;
- (c) comply with our policies, standards, procedures, work instructions, knowledge and tools;
- (d) comply with all lawful and reasonable directions given to you;
- (e) act honestly and with integrity;
- (f) act responsibly towards the environment
- (g) not engage in any form of bribery or corruption (including the offering or acceptance of gifts or hospitality in excess of the common courtesies associated with the ordinary and proper course of business);
- (h) treat everyone you interact with in your work with courtesy and respect, support an inclusive and diverse workplace, and not engage in bullying, discrimination, or harassment of any kind (including sexual harassment) or victimisation;
- (i) act ethically and responsibly in your approach to business decisions, including ensuring that such decisions are made on commercial grounds and that any information you gather in respect of our competitors is done in a lawful and ethical manner;
- (j) not improperly use our name or your position or authority with us for personal gain (or to gain an advantage or benefit for another person) or in competition with us;
- (k) take the highest level of care to ensure that financial integrity is maintained;
- (l) act with due care and diligence in fulfilling the functions of your position;
- (m) disclose any actual or potential conflicts of interest, any fraudulent behaviour and act in the best interests of Parratech as a whole;
- (n) comply at all times with all relevant occupational health and safety legislation, regulations and policies and attend and undertake your work without being under the influence of drugs, alcohol or other substances;
- (o) protect any of our property under your control and not use such property for personal purposes, without our express and clear prior approval; and

- (p) not engage in conduct which may affect the good reputation and integrity of the Parratech Company.
- (q) protect the confidentiality of information obtained in the course of your employment with the Company, even after your employment with the Company ceases.
- (r) safeguard personal information you access or handle in the course of your work, only access or use it for legitimate business purposes, and immediately report any suspected or actual data breach in accordance with our Privacy Policy;
- (s) protect our information technology systems and data, including by keeping login credentials confidential, using our systems and equipment responsibly, and promptly reporting any suspected cyber security incident, phishing attempt or unauthorised access;
- (t) disclose any proposed transaction, arrangement or dealing between us and a related party (including a family member or an entity you or a family member control) before it proceeds, and not cause us to enter into any such transaction, arrangement or dealing on other than arm's length terms without appropriate approval;
- (u) keep accurate and complete business records, including expense claims, timesheets and other financial or operational records, and never falsify, alter or omit information from any record or report;
- (v) raise concerns about the ethical or responsible business practices of any supplier, contractor, agent or other business partner acting on our behalf; and
- (w) engage with social media in accordance with our Social Media Policy, including when identifying yourself as, or otherwise being identifiable as, associated with us.

2.2 Professionalism and Work Environment

In addition to acting ethically, we continually seek to improve the quality of our work and our work environment, which sets additional expectations of you. This includes:

- (a) actively engage in continuing education to improve the skills and knowledge relevant to our work and to strive to deliver exceptional work and customer service.
- (b) collaborate with other colleagues to create a safe and healthy workplace.

2.3 Other Relevant Company Policies

You are required to comply with our policies, as in place and to co-operate fully with any internal investigations or external law enforcement agencies if required.

In particular, the following policies should be read in conjunction with the Code of Conduct (but, not limited to):

- (a) Anti-Bribery and Corruption Policy;
- (b) Gifts and Hospitality Policy;
- (c) Parratech Expense and Reimbursement Policy;
- (d) Travel and Expense Policy;
- (e) Managing Diversity, Harassment & Bullying in the Workplace Policy;

- (f) Conflict of Interest Policy;
- (g) Workplace Health, Safety and Wellbeing Policy;
- (h) Drugs and Alcohol Policy;
- (i) Privacy Policy;
- (j) IT and Cyber Security / Acceptable Use Policy;
- (k) Social Media Policy;
- (l) Whistleblower Policy;
- (m) Confidentiality Policy.

3. Code of Conduct in Practice

3.1 Reporting a breach of the Code

If you suspect that any fraudulent or unethical behaviour has occurred, or are concerned that any conduct by any director, officer or employee may be in breach of an applicable law or this Code, you are expected and required to report that behaviour. Nothing in this Code limits any person's right to make a protected disclosure under applicable whistleblower legislation or to make a report anonymously where permitted by law.

We do not tolerate retaliation of any kind against anyone who, in good faith, reports a suspected breach of this Code or applicable law, raises a concern, or participates in an investigation. Anyone who engages in retaliation may be subject to disciplinary action.

Some reports of breaches of this Code may be disclosures that qualify for protection under whistleblower protection laws applicable to you, including the Corporations Act 2001 (Cth) for our Australian entities and the Protected Disclosures (Protection of Whistleblowers) Act 2022 for our New Zealand entity. For further information, please see our Whistleblower Policy.

3.2 Consequences for breaching the code

If we determine that it is appropriate to do so, we may investigate allegations of breaches of the Code. If we find that there has been a breach of the Code, appropriate disciplinary and remedial action may be taken, depending on the nature of the breach.

What constitutes appropriate disciplinary or remedial action will depend on the circumstances, and may include training, coaching, counselling, formal warnings, demotion, or termination of employment.

We may inform relevant regulators or law enforcement bodies where we consider it is appropriate to do so.

3.3 More Information

If you have any questions about the Code, please see the table below for who to contact.

If you have a question about...	Contact
<i>Whether a proposed course of action could breach the Code.</i>	Your immediate manager. If you are not comfortable speaking to your immediate manager about your query (for example, if they are asking you to do something you are not comfortable with or think may be in breach of the Code), please contact your HR Team or Legal.
<i>You would like to report a breach of the Code.</i>	External agencies such as, for our Australian entities, the Fair Work Commission, Australian Human Rights Commission, Equal Opportunity Commission/bodies, State or Territory Anti-discrimination bodies; or, for our New Zealand entity, the Employment Relations Authority and the Human Rights Commission. HR Team or Legal. Other eligible recipients are set out in the Whistleblower Policy.
<i>You are unsure about the law or regulations in an area in which you work.</i>	Legal or HR Team
<i>You would like more information about the Code.</i>	Legal or HR Team

Approved by

Jason Fooks

Jason Fooks
Managing Director

REVISION	Date	Last reviewed
B	7 September 2026	7 September 2026