



Corporate Code of Conduct Policy and Procedure

Symal Group Limited

Date of adoption: 19/02/2026

1. Purpose and scope

This policy sets out the standards of behaviour expected of the directors, senior executives, Key Management Personnel, officers and employees at Symal (collectively, **Symal Personnel**). It is designed to assist Symal Personnel to understand their responsibilities and obligations and further to provide guidance on expected behaviour in the workplace. This policy applies whilst an Employee is wearing Symal branded apparel in personal time.

Symal's Values

The Board has adopted the following core values which guide the Company's culture and decision-making:

- Integrity – acting ethically and transparently in all dealings;
- Accountability – taking responsibility for actions and outcomes;
- Safety – prioritising the wellbeing of people and communities;
- Respect – fostering inclusion and diversity; and
- Excellence – striving for quality and continuous improvement.

Directors and senior executives are responsible for modelling these values and embedding them into performance evaluation and leadership practices.

2. Definitions

'Employee(s)' or 'Symal Personnel' means a full time, part time, casual or volunteer employee of Symal and includes contractors and agents of Symal.

'Key Management Personnel' means any person who has authority and responsibility for planning, directing and controlling the activities of the Company, directly or indirectly, including any director (whether executive or otherwise).

'Social Media' includes, but is not limited to, content created by people using highly accessible and scalable publishing technologies including, but not limited to, blogs, bulletin boards, microblogging (Twitter), vod and podcasts, discussion forums, RSS feeds, video and photo sharing

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websites (YouTube, Flickr, Instagram, Pinterest), social networking sites (Instagram, Snapchat, Facebook, Twitter, Google+, LinkedIn), wikis and online collaborations (Wikipedia), instant messaging and geo-spatial tagging (Foursquare) and any future technologies allowing communication online or mobile communication between people.

‘Symal’ means Symal Group Limited and all its subsidiaries.

3. Responsibilities

Under this Policy, the following Departments have the following responsibilities:

Action	Responsible party
Adherence to the code of conduct	All Symal Personnel

4. Regulatory Requirements

- Fair Work Act 2009 (Cth)
- Fair Work Regulations 2009 (Cth)
- Corporations Act 2001 (Cth)
- Occupational Health and Safety Act 2004 (Vic)
- Work Health Safety Act 2011 (NSW)
- Anti-Bribery Act 2010 (Cth)
- Equal Opportunity Act 2010 (Vic)
- Racial and Religious Tolerance Act 2001 (Vic)
- Crimes Act 1958 (Vic)
- Racial Discrimination Act 1975 (Cth)
- Sex Discrimination Act 1992 (Cth)
- Disability Discrimination Act 1992 (Cth)
- Age Discrimination Act 2004 (Cth)
- Modern Slavery Act 2018 (Cth).

5. Policy and Procedure

An ethical environment relies upon all Symal Personnel having responsibility for their own professional behaviour. Symal has a responsibility to provide a safe, encouraging and supportive work environment that recognises and values of all Symal Personnel diversity, abilities and contributions. All Symal Personnel are entitled to be treated with respect and work in an environment free from discrimination, harassment, bullying, violence (or threats of violence) or vilification. Equally, all Symal Personnel have a responsibility to act with integrity, honesty, transparency and impartiality in their dealings with colleagues, clients, subcontractors/suppliers and members of the wider community.

All Symal Personnel are required to perform their duties in a safe and competent manner in accordance with relevant Occupational Health and Safety legislation and Symal’s policies and procedures and the relevant employment contract or letter of engagement. All Symal Personnel

must take care not to put themselves or other members of Symal at risk or reduce their ability to carry out their duties through unsafe practices or inappropriate behaviours.

This policy applies whilst an Employee is wearing Symal branded apparel in personal time.

Personal and Professional Behaviour

All Symal Personnel are to perform any duties associated with their position diligently, impartially and conscientiously, to fulfill the inherent requirements of their position.

In the performance of their duties, all Symal Personnel are to:

- treat members of the public, clients, subcontractors, consultants and other employees with respect, courtesy and sensitivity to their rights;
- act with honesty, ethically, responsibly and integrity;
- act in the best interests of Symal;
- perform their duties with skill, honesty, care and diligence, using authority in a fair and equitable manner;
- value and maintain professionalism;
- work as a team;
- provide all necessary and appropriate assistance;
- comply with any relevant legislative, industrial or administrative requirements, and all of Symal's rules, policies and procedures;
- strive to obtain value for money and avoid waste;
- maintain confidentiality;
- disclose and deal appropriately with any conflicts between their personal interests and their duties as Symal Personnel;
- avoid undertaking any activity that could potentially compromise the performance of their duties;
- • report any breaches of this Policy through their manager, Human Resources, the General Counsel or in accordance with the Company's Whistleblower Policy, where appropriate; and
- comply and adhere to this policy.

Equity, Diversity and Social Inclusion

All Symal Personnel are instrumental in creating a work environment where all members of the Symal community can participate fully, find a sense of belonging, and have opportunity to engage meaningfully with Symal's clients, subcontractors, suppliers and consultants.

All Symal Personnel must act to create a fair, respectful, inclusive and safe environment, where diversity is valued and where unlawful discrimination, violence (or threats of violence), bullying, harassment and victimisation in any form are considered unacceptable.

Conflict of Interest

The potential for a conflict of interest arises when Symal Personnel have private interests that could influence or appear to influence judgements made during their professional duty.

Symal expects all Symal Personnel to avoid any circumstances which may lead to a conflict of interest between their or their personal interests or activities and the interests or activities of Symal.

Such matters include:

- the misuse of influence to further personal, sexual and financial relationships, whether with other Symal Personnel, subcontractors or clients;
- real or apparent conflicts of interests in making decisions and providing advice;
- Symal Personnel or their families or both benefiting from a business transaction that rightfully should be made available to Symal;
- personal transactions, situations or involvement in which personal interests of Personnel or their family's or both actually conflict or have the appearance of conflicting with those of Symal or its related parties (eg interests in companies in competition with Symal);
- Symal Personnel engaging in other employment or activity that prevents or restricts them from performing to their best ability;
- Symal information of a confidential nature being used or disclosed without proper authorisation; and
- business actions which have the potential to embarrass, harm or cause reputational damage to Symal Personnel individually or Symal as a whole.

Symal Personnel must not solicit gifts or benefits that might in any way compromise or influence them in their capacity as representatives of Symal. Symal Personnel may give or receive a gift which is offered as part of a social, cultural or ceremonial practice.

Should an Symal Personnel have a financial interest in a company that is in a position to influence a contract for business between that company and Symal, this interest should be declared to their supervisor before acting for Symal in matters with the company. All Symal Personnel must declare any such circumstances so that either proper approval to continue those interests or activities can be granted, or the conflict may be avoided.

It is almost always a conflict of interest for Symal Personnel to work simultaneously for a competitor, client or supplier. Except with the prior approval of the Chief Executive Officer, Symal Personnel are not allowed to work for a competitor as a consultant or board member. Symal Personnel should avoid any direct or indirect business connection with Symal's customers, suppliers or competitors, except when such action is on Symal's behalf.

Compliance with Laws

Symal Personnel must comply with all legal obligations, regulatory requirements, any building industry codes including instruments such as the Fair Work Act.

All Symal Personnel must protect Symal's legality by complying with all environmental, safety, industrial and fair dealing laws.

Symal expect Symal Personnel to be ethical and responsible when dealing with Symal's finances, projects, partnerships and public image. Symal is committed to identifying and managing environmental, social and governance (ESG) risks, including modern slavery risks within its operations and supply chains. The Company will undertake appropriate due diligence and maintain internal controls to mitigate such risks and report in accordance with applicable legislation.

Gifts, Benefits and Hospitality

Symal Personnel have a responsibility to behave with integrity and impartiality. This includes responding appropriately to offers of gifts, benefits and hospitality. Symal Personnel must not seek or accept gifts that could be reasonably perceived as influencing them, particularly from people or organisations about whom they are likely to make decisions involving:

- tender processes;
- projects;
- procurement;
- regulation;
- recruitment processes; or
- clients.

All Symal Personnel are required to report all gifts, hospitality or other benefits accepted and valued at over \$AUD500.00 (excluding GST) to Human Resources who will maintain a Gift Register. The Register will then be provided to the Audit, Risk and Compliance Committee for review. The Audit and Risk Committee will review the Gift Register at least annually to identify trends, potential conflicts of interest and control weaknesses.

Gifts of money (or cash equivalent) may not be accepted in any circumstances. If Symal Personnel are offered a bribe, the incident must be reported to the relevant manager immediately. If any Symal Personnel is unsure how to respond to an offer of a gift, benefit or hospitality, they should seek advice from their manager/supervisor.

Symal has a separate Anti-Bribery and Corruption Policy, please refer to the Anti-Bribery and Corruption Policy for more information.

When giving gifts and hospitality, all Symal Personnel need to ensure that it is done so for a legitimate business purpose with a clear benefit to Symal, and that it does not compromise the real or perceived integrity of recipients. Any gifts and hospitality must be approved in line with Symal's Limits of Authority.

Bribery and Corruption

Symal will not tolerate bribery or corruption in any form. Symal makes sure our business partners understand our stance by publishing this Policy and (where appropriate) by including clauses in our contracts to make this clear.

Symal Personnel should never:

- offer, accept or demand a bribe (including excessive gifts and hospitality) in order to attract or keep business or gain any other inappropriate advantage;
- offer or give in to demands to make illicit or illegal payments to anyone Symal does business with;
- engage and/or pay for services Symal don't legitimately need or have received; or
- make illegal or inappropriate contributions to candidates for public office or to political parties/organisations.

Please see Symal's Anti-Bribery and Corruption Policy,

Procurement

Symal acknowledges that procurement is an area vulnerable to real and perceived corruption and maladministration.

Symal will implement a tender process for supplier and contractors and ensure all suppliers and contractors are treated fairly.

Symal does not engage procurement practices or any other behaviours that induce conflict or corruption, or which deny legitimate business opportunities. Symal demonstrates high standards of probity by:

- articulating and enforcing expected behaviours in procurement for projects;
- adopting a tender process which must be followed and ensuring outcomes of tenders demonstrate value for money;
- treating all tender participants fairly and equally;
- training relevant employees in the policy and procedures to ensure they are aware of their accountabilities;
- involving the procurement department, which is skilled, knowledgeable and experienced;
- implementing appropriate checks and balances at various stages in the procurement process;
- articulating to Symal Personnel involved in procurement the concept of conflict of interest and implementing strategies to identify and manage potential issues;
- communicating with suppliers in a consistent manner that does not disadvantage or advantage any contractor or supplier over others; and
- securing confidentiality of contractor and supplier information and evaluation processes.

Public Comment

Symal Personnel must not speak to the media about issues relating to any tender, project, client or on political or social issues. Please refer to the Continuous Disclosure Policy for a list of the authorised spokespersons.

Confidential Information and Privacy

Symal Personnel are entitled to confidentiality and privacy with respect to information relating to them.

Symal Personnel must maintain the confidentiality of confidential information entrusted to them by Symal or its clients, except when disclosure is authorised by senior management or required by laws, regulations or legal proceedings. Confidential information includes all non-public information that might be of use to competitors of Symal, or harmful to Symal or its clients, if disclosed.

Records Management

Symal is legally bound to adhere to proper records management practices and procedures. Symal Personnel must not damage, dispose of or in any other manner interfere with official documents or files. The destruction of records may only take place in accordance with Symal's Document Retention and Archive Policy and Procedure.

Demonstrating Leadership

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Symal Personnel should model their behaviour based on Symal's values and this policy, and always act in an ethical manner. Leadership is about positive influence, inspiring and empowering others.

Corporate Dress

Symal Personnel are expected to dress appropriately considering the work setting giving full effect to Occupational Health and Safety legislation.

Company Motor Vehicles

Symal Personnel are required to adhere to the Symal Group Motor Vehicle Policy and Procedure. Symal's expectation is that an Employee is diligent in complying with the road laws that govern the state or territory in which you drive.

Social Media

Symal Personnel are prohibited from posting confidential information on Social Media. Employees are required to adhere to the Email and Internet Policy and Procedure which sets out Symal's requirements with respect to Social Media.

6. Enforcement

Symal Personnel must comply with the requirements of this Policy. Any breach of this Policy may result in disciplinary action up to, and including, termination of employment.

If Symal Personnel or business partners are uncertain about the operation of this Policy or its application to a particular situation, the point of contact is the General Counsel.

7. Document Review

Symal reserves the right to vary, replace or terminate this Policy from time to time. This Policy forms part of the Company's corporate governance framework and will be periodically reviewed by the Board to ensure alignment with ASX Corporate Governance Principles and Recommendations.