



WELCOME TO CAPRAL

Capral's Code of Conduct has been designed to assist employees make the right decisions and remain true to Capral's Values.

Acting in accordance with our Code of Conduct is about more than just protecting our Company's image and reputation, and avoiding legal issues. It's about sustaining a successful company, where employees are proud to work. This means acting with honesty and integrity, trusting each other and treating others with respect.

This Code is not meant to cover all possible situations that may occur but it provides a frame of reference against which to measure our behaviour. Further detail is contained in Capral's Business Practices and Policies which can be found on the intranet.

Employees should always seek guidance when they are in doubt about the proper course of action in a given situation. Capral expects that employees working at Capral will:

- always act legally, and with honesty and integrity
- trust and respect each other
- avoid conduct that could damage Capral or its reputation
- put the Company's interests ahead of self interest.

Thank you for joining me in making this company successful and a safe and rewarding place to work.

A handwritten signature in black ink, appearing to read 'Tony Dragicevich', written over a white background.

Tony Dragicevich
Managing Director

Note: For the purpose of this Code, a reference made to an 'employee' covers Capral and its subsidiaries with respect to all existing and prospective paid employees and managers, non-paid workers, trainees, apprentices, contractors and persons employed by contractors.

PRINCIPLES OF BEHAVIOUR

ALL EMPLOYEES

There are a number of basic principles of behaviour that employees must adhere to and these include the following:

- Always consider **Safety First** and do our absolute utmost to comply with all health and safety requirements
- Not take or be affected by drugs, alcohol or prohibited substances whilst at work
- Always ensure the highest standard of quality in products and services
- Continuously strive to demonstrate Capral values and comply with Capral Business Practices, procedures and policies
- Ensure that dealings with colleagues, customers, suppliers and others with whom we deal are respectful, honest and fair
- Not discriminate on the basis of factors, such as sex, race, disability, pregnancy, age, marital status or sexual preference
- Comply with all laws and regulations
- Declare any conflict of interest between our role at Capral and our involvement in an outside activity
- Not use company information or work time for private gain
- Not make any unauthorised public statements about Capral.

LEADERSHIP ROLES

In addition to complying with these general principles, managers, supervisors and team leaders must execute managerial and supervisory duties with fairness and must:

- Not permit or fail to act upon a breach of this Code of Conduct
- Promote a team spirit amongst employees by making objective, transparent and clear decisions
- Inspire others through personal behaviour, integrity, commitment and hard work
- Demonstrate trust and respect for fellow employees
- Always comply with Capral's delegations of authority
- Maintain full confidentiality and professionalism at all times
- Ensure compliance with Capral's Business Practices, procedures and policies
- Never accept gifts or benefits that may be construed as an attempt to influence business decisions
- Provide a safe working environment and ensure compliance with SH&E programs.

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SAFETY, HEALTH & ENVIRONMENT (SH&E)

At Capral, we should always consider **Safety First** - the safety and wellbeing of ourselves, our colleagues, customers, suppliers and anyone who deals with our business. We are also committed to the efficient use of resources and the reduction and prevention of environmental harm in our operations. All injuries and environmental incidents and harm are preventable.

SH&E EXPECTATIONS

- Report for work fit for duty
- Immediately report all injuries, illnesses and safety and environmental incidents
- Learn and follow all SH&E requirements related to our job
- Maintain SH&E awareness in all tasks, preventing injuries, illnesses and safety or environmental incidents
- Maintain a clean and orderly work area at all times
- Constantly review the workplace for hazards which could lead to injury, illness or incident, and initiate appropriate corrective actions
- Address improper SH&E practices observed in co-workers, including contractors
- Look for opportunities to improve SH&E performance and actively participate in SH&E improvement activities
- If ill or injured, actively participate in rehabilitation programs to promote recovery
- Comply with safety policies, procedures and instructions.

SMOKING, DRUGS AND ALCOHOL

No one must be under the influence of, or involved with the unauthorised consumption, possession, sale, or transfer of alcohol, drugs or prohibited substances ('substances') in our work place.

Capral will not tolerate involvement with substances which could have an adverse effect on job performance or could jeopardise the safety of other people.

Employees must ensure that they report for work, and remain at work, in a condition free from alcohol/ substance effects.

Employees must ensure that activities undertaken outside of work do not adversely affect their ability to carry out their role in a safe and responsible manner.

Smoking is only permitted in site designated areas. Employees wishing to smoke may only do so in scheduled breaks. Unauthorised smoke breaks are not permitted during the working day.

Refer to Capral's Drug & Alcohol Business Practice and Policy.

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EQUAL EMPLOYMENT OPPORTUNITY (EEO)

Capral is committed to being an EEO employer. This means that employees are treated fairly and equally when decisions are made and that unlawful discrimination, harassment and bullying does not occur.

Employees must abide by the guidelines outlined in the EEO, Harassment and Bullying Business Practice and EEO Policy. This includes being tolerant, working cooperatively and valuing differences in each other and never participating in, tolerating or ignoring harassment, discrimination or bullying.

MENTAL HEALTH & WELLBEING

Capral is committed to developing a workplace culture that promotes the mental health and wellbeing of its employees.

Capral's objectives include:

- increasing employee knowledge and awareness of mental health and wellbeing issues and behaviours
- facilitating employees active participation in mental health and wellbeing initiatives
- building and maintaining a supportive workplace in respect of these issues.

Managers and employees have an important role to play in building and maintaining a workplace environment that supports mental health and wellbeing of employees. Refer to Capral's Mental Health and Wellbeing Business Practice and Policy for more information.

DOMESTIC VIOLENCE

Capral is committed to supporting employees who experience domestic violence.

Capral's objectives include:

- increasing employee awareness of domestic violence
- encouraging employees experiencing domestic violence to seek immediate assistance
- providing a supportive workplace culture to employees experiencing domestic violence.

Refer to Capral's Domestic Violence Policy and the intranet for further information.

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REPRESENTING CAPRAL

PERSONAL PRESENTATION

Employees represent Capral at all times whilst at work and outside work whenever dressed in a Capral uniform or representing Capral at an event. You must ensure that presentation is clean and well-kept and that your attire is appropriate to the role performed. If these requirements are not met, you may be directed to cease work without pay until such time as presentation is to the required standard.

MEDIA ENQUIRIES AND ANNOUNCEMENTS

As employees of a public listed company, there are certain rules relating to the release of information that may have an impact on the share market. Capral's Continuous Disclosure Policy (available on our website and intranet) requires all public announcements to be agreed by the Managing Director and released to the ASX by the Company Secretary.

Public releases need to be approved by the relevant member of the Senior Team (direct report to the Managing Director), with significant matters being referred to the Managing Director.

All enquiries from the media or external analysts must be referred to the Managing Director or Chief Financial Officer for consideration.

PERSONAL INFORMATION

Capral respects the privacy of employees and others with whom it deals and therefore it maintains only personal and medical records necessary for lawful purposes.

Employees may request to view certain details contained in their own personnel records and must inform Capral of changes to personal information and to ensure that all emergency contact information is current at all times. Refer to Capral's Personal Information Business Practice.

E-MAIL AND INTERNET USAGE

The use of e-mail and internet access should be primarily for business-related purposes (i.e. to communicate with colleagues, customers and others with whom we deal, to research relevant topics and obtain useful business information).

Information and messages that are sent, received or stored on Capral's email system are Capral's property. In accordance with the Computer Systems Usage Business Practice, Capral may monitor, access, review and disclose all messages, documents and information sent, received or stored.

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SOCIAL MEDIA

Social media is a term used to describe web-based media that is used for social interaction. Common examples include Facebook, MySpace, LinkedIn, Twitter and Blogs.

Employees must ensure the interests of co-workers and the reputation of the company is protected at all times.

Unless prior written permission is provided by Capral, employees are not authorised to post any company related information on a social media platform.

Capral may rely on social media conduct by an employee (even if it has taken place outside of the workplace) in disciplinary proceedings.

Refer to Capral's Social Media Business Practice.

PROPERTY AND RESOURCES

Employees are responsible for safeguarding Capral's property and resources. You must use and maintain all property and resources with care and respect, while guarding against waste and abuse.

You must only use company property and resources in accordance with policies, practices and procedures, comply with security programs that help prevent unauthorised use or theft, and abide by all regulations or agreements governing usage. You must not remove any company property without the approval of the appropriate management authority.

If you invent, design or discover a new technique, process or other idea, you must disclose that knowledge in full to Capral. Capral retains all rights to register in Capral's name, and use for its own purposes, anything created in the course of employment.

Capral's property must not be used for excessive personal use or gain and must be returned before leaving the employment of Capral.

GIFTS, BENEFITS AND ENTERTAINMENT

Employees must exercise reasonable judgment before accepting offers of gifts, benefits and entertainment in connection with employment at Capral where it may be construed as an attempt to influence business decisions.

Gifts of nominal value and unsolicited promotional materials of a general advertising nature are permitted, provided they are given as a gesture of professional friendship and do not involve a company commitment having to do with the transaction of business. Employees should advise their manager of any such gifts, benefits or entertainment received. Employees should seek management advice if they are in any doubt about whether or not a gift should be accepted.

On occasion, some employees may be required to entertain customers and business associates, and to accept offers of entertainment in return. The appropriateness of entertainment is dependent upon the existence of a business relationship that could benefit Capral.

It is never acceptable to solicit gifts, entertainment activities, or benefits for personal gain (including for a family member or friend).

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ADDITIONAL EMPLOYMENT

Prior to taking on any kind of employment with another company, or operating a business, whilst employed at Capral, employees must ensure that:

- Prior written approval is obtained from the Business Unit Manager and the Human Resources Manager
- It is performed outside of working hours and does not interfere with employment obligations at Capral (this includes fatigue management considerations)
- It does not in any way interfere with work performance
- There is no conflict of interest.

In addition, full time employees who will be regularly undertaking more than 3 hours of additional employment within 24 hours of commencing / finishing a work day/ shift with Capral are required to advise Capral in writing so that it can be established whether a fatigue management assessment is required.

Employees must notify management immediately if employment with another employer is gained whilst still employed by Capral.

If the new employment is with a company in any way connected, or similar to Capral, employees must inform management of those facts, as there may be a potential conflict of interest.

CONFLICTS OF INTEREST

Employees must avoid situations that may create a conflict between their personal interests and the interests of Capral. Examples of such conflict include:

- A financial interest in, or serving in a business capacity with, another company that does business with, or is a competitor of, Capral
- Using Capral's confidential information or other corporate assets for personal profit
- Accepting a benefit or loan from an existing or potential customer or supplier
- Family members or partners working in a direct reporting relationship. Prior written approval must be obtained from the relevant Senior Manager (direct report to the Managing Director).

If an actual or potential conflict of interest develops, you must report the matter immediately to your manager to determine what actions need to be taken to eliminate the conflict of interest.

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FAIR DEALING

COMPETITION AND CONSUMER PRACTICES

The main aims of the Competition and Consumer Act is to promote competition and fair trading. Non-compliance will not be tolerated; it damages the reputation of Capral and potentially exposes everyone concerned to significant fines and expenses, and in some cases, imprisonment.

To ensure that Capral and its employees comply with the Act, a compliance training program has been developed that helps explain the obligations. Completion of the training is compulsory for relevant employees.

Management advice should be sought immediately if there are concerns about fair dealing.

ETHICAL CONDUCT

Employees must act in an ethical manner that is not misleading or deceptive when dealing with customers, suppliers or other employees. You must act truthfully and fairly, making every effort to ensure that your words or conduct do not contribute to misunderstandings on the part of others who may be dealing with Capral. You must ensure that information provided, or used to make decisions, is accurate.

TRADING IN CAPRAL SECURITIES

There are certain requirements to be followed if you choose to purchase or sell securities in Capral, or are invited to participate in a company employee incentive plan. Capral's Securities Trading Policy can be found on our intranet and website and is available in hard copy on request.

The Corporations Act provides that anyone with information not generally known to the securities market that has the potential to affect the share price must not use that information to deal in those shares, either for personal gain or for the gain of another person.

This also applies to trading in non-Capral shares where information about the other company has been gained through an association with Capral.

Trading in Capral securities by a Capral employee is generally confined to the 3 periods commencing after the announcement of the half-year results, the annual results, and the Annual General Meeting, and ending one month thereafter - **provided always that** the employee does not hold any material non-public information during this period.

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STATEMENT OF COMPLIANCE

Included in the Half and Full Year Senior Management Questionnaires is a Statement of Compliance with respect to this Code. Members of senior management are required to certify compliance.

WHO TO CONTACT

Questions relating to this Code should, in the first instance, be directed to a manager. If additional information is required, please contact Human Resources.

Where there is a concern that there may be a breach of this Code, employees should speak with their manager in the first instance. If this is not possible, or the employee is uncomfortable talking to their manager directly, they should contact the next level manager or Human Resources.

Capral also has a Complaints (Whistleblower) Policy, which is available on our website and the intranet. A 'whistleblower' is 'someone who alerts the authorities to misconduct from within an organisation'.

