

A photograph of three workers in a warehouse. On the left, a man with a beard and glasses wears a yellow and navy blue long-sleeved shirt and navy blue pants with reflective stripes. In the center, a woman with glasses wears a high-visibility yellow jacket over a dark shirt and black pants. On the right, a man with glasses wears a yellow short-sleeved shirt and navy blue shorts. They are all wearing safety boots. The background is filled with tall industrial shelving units stacked with various materials, including long metal beams and boxes.

Be your best

Our Code of Conduct

CAPRAL
ALUMINIUM

**Good character and conduct
are key attributes of successful
organisations and individuals.**

**What we achieve at Capral is
important – how we achieve it
is even more important.**

Tony Dragicevich, Managing Director

Capral acknowledges the Traditional Custodians of the land on which operations reside and pays respects to their Elders past and present.

We recognise that in a world profoundly affected by global sustainability issues, from climate change to biodiversity, Capral must act wisely to protect the environment and community whilst working for our stakeholders and customers.

We accept that achieving high sustainability standards is no longer optional; it is the new norm. Capral is committed to this via a net zero target of 2050 and ASI membership. ASI certification promotes sustainable operations and responsible sourcing of aluminium in all areas of the supply chain.

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Capral Policies and Business Practices referenced in this document:

Business Travel and Entertainment; Computer Systems Usage; Continuous Disclosure; Delegations of Authority; Diversity; Domestic Violence; Environmental; Equal Employment Opportunity, Harassment and Bullying; Mental Health and Wellbeing; Personal Information; Privacy; Safety; Security; Securities Trading; Shareholders Communication; Smoking, Drugs and Alcohol; Social Media; Whistleblower.

A man with a beard and safety glasses is smiling while working in a warehouse. He is wearing a high-visibility vest and gloves. The background shows industrial shelving.

Be aware

*Empowering our employees to
make the right decisions.*



A message from our Managing Director

At Capral, we are proud of our business, products, and our people. We are committed to building value for our stakeholders, and we aim to be held in the highest regard by our customers, suppliers, regulators and employees.

Actions, words and behaviours do matter. Regardless of what role we play within Capral, we must always endeavour to live by Capral's core values – Safety First, Play Fair, Better Every Day, Customer Success, and Own It.

When we do the “right thing” we show we truly care for our customers and respect the people with whom we work. Each one of us shapes our culture through our words and actions – a culture where every employee should have the opportunity to do their best work.

Our Code of Conduct provides a set of guiding principles to help us make the right decisions in the workplace. It reflects our core values and serves as a foundation and context for company policies and procedures. I encourage you to read this document carefully and refer to it regularly. The Code of Conduct should guide your daily decisions, actions and treatment of customers, suppliers and co-workers.

As employees, we should be transparent about our motives, learn from our mistakes and ask for help when faced with difficult situations. I expect Capral's Leaders and Managers to foster a culture where employees feel safe to ask questions and raise concerns when something doesn't seem right.

As a company, we are only as good as our people, and our people must be the best. Remember, Capral's culture starts with you.

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, managers, non-paid workers, trainees, apprentices, contractors and persons employed by contractors.





Capral's Vision and Values

**Our Vision is to be Australia's
first choice supplier
of aluminium products and solutions.**

We are committed to our values



SAFETY FIRST

Everyone is responsible

Injuries can be
prevented

All jobs can
be done safely



CUSTOMER SUCCESS

Customers determine
our success

Committed to
service and quality

Be responsive
to customer needs



PLAY FAIR

Be honest and respectful

Do the right thing
by each other and the
environment

Work as a team



BETTER EVERY DAY

Continuous
improvement

Embrace change

Be innovative



OWN IT

Be accountable

Feel empowered

Take pride in our work

Act boldly



Why do we have a code of conduct?

Capral's Code of Conduct is designed to assist employees in making the right decisions and acting in accordance with our core values.

It is more than just protecting Capral's image and reputation. It is about developing a great culture and building a successful business where we are all proud to work.

This means being honest and respectful, doing the right thing by each other, and working as a team to deliver great outcomes for our customers and stakeholders.

Sometimes you might face situations where doing the right thing is not obvious. This is where our Code of Conduct can help.

Use this guide
to help you make the right decisions in
accordance with our core values.

How can the code help you?



CONDUCT

*yourself honestly, ethically
and legally.*



UPHOLD

*our values and protect
our reputation.*



UNDERSTAND

*what Capral
expects from you.*



MAKE

*good decisions
every day.*



COMPLY

*with laws, regulations
and standards
that apply to Capral.*



KNOW

*where to go for assistance
if you have any
questions or concerns.*

How to make good decisions

The Capral Integrity Test

When confronted with an ethical question that does not appear to have an obvious answer, ask yourself the following questions:

*Ask if
you're in
doubt.*

- **DOES** it feel like the right thing to do?
- **DO** I know that it is legal?
- **IS IT** consistent with both Capral's values and this code?
- **WOULD** I be proud of my actions if shared in the media?
- **AM** I comfortable talking to my family about my actions?
- **WOULD** I stake my reputation on it?
- **WILL** it build trust and pride in Capral?



no

If the answer to any of these questions is NO; the action may have serious consequences.

Do not do it. Seek guidance.



yes

If the answer to all of these questions is YES, proceed with confidence.

Seek guidance if you remain unsure or would benefit from another perspective.



Principles of behaviour

Employees:

Capral empowers its employees to make the right decisions.

As employees, each of us has as a responsibility to:

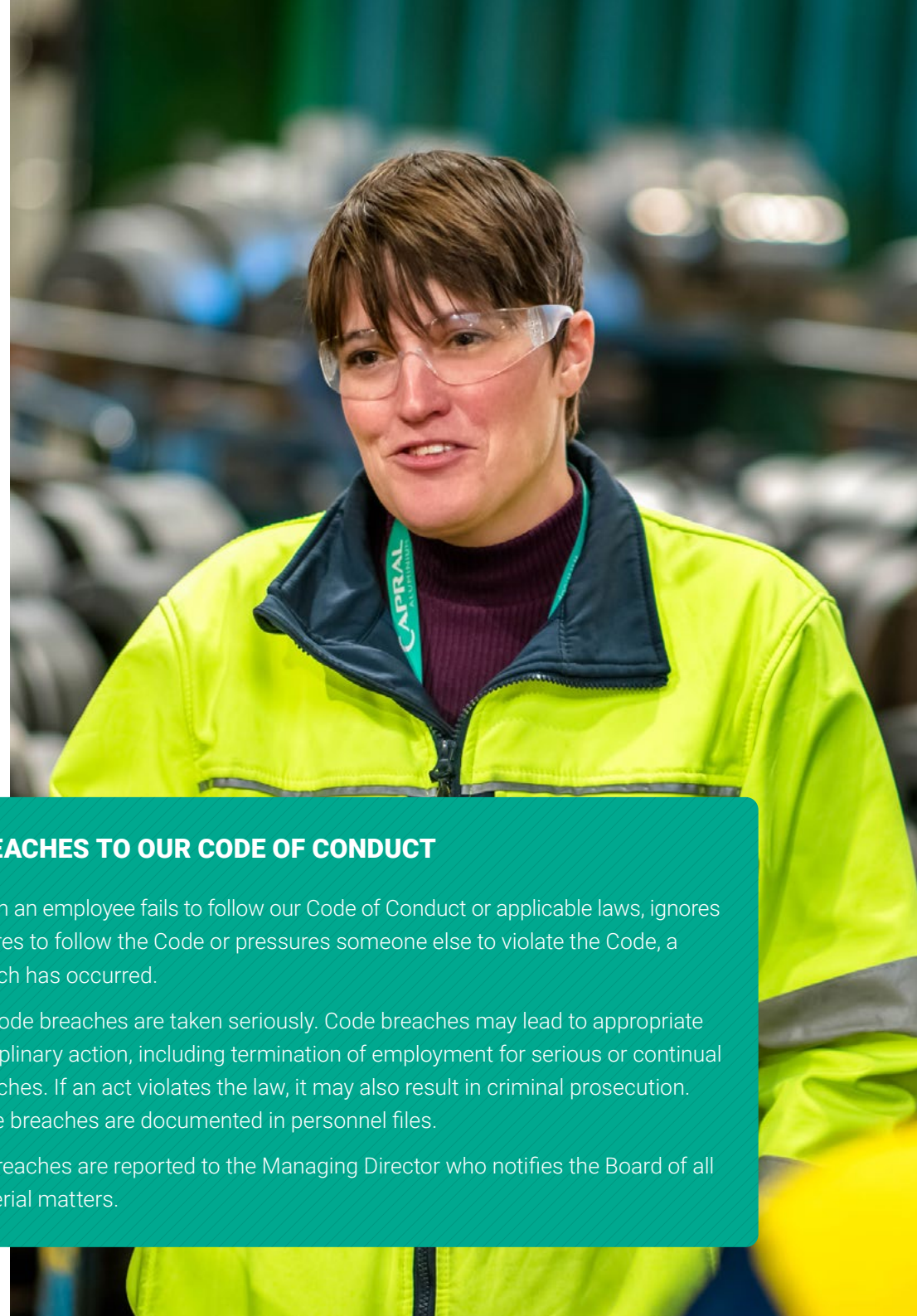
- **Know and abide by Capral's Code of Conduct.**
Read it and follow it along with policies, business practices and work instructions that apply to your job.
- **Think before you act and ALWAYS consider Safety First.**
- **Use good judgement, be honest and ethical in every action you take.** If you are asked to breach the Code of Conduct, don't do it. Report the concern to your Manager or Human Resources as soon as possible.
- **Ask for help.** When an answer is not clear, ask for management guidance before taking action.
- **Stay alert.** Pay close attention to any activity that is inconsistent with our Code of Conduct, our policies and the law.
- **Report Concerns.** Don't ignore a breach; report your concerns immediately to your Manager or Human Resources.

BREACHES TO OUR CODE OF CONDUCT

When an employee fails to follow our Code of Conduct or applicable laws, ignores failures to follow the Code or pressures someone else to violate the Code, a breach has occurred.

All Code breaches are taken seriously. Code breaches may lead to appropriate disciplinary action, including termination of employment for serious or continual breaches. If an act violates the law, it may also result in criminal prosecution. Code breaches are documented in personnel files.

All breaches are reported to the Managing Director who notifies the Board of all material matters.



Principles of behaviour

Managers: A special responsibility

At Capral, we expect Managers to...



LEAD BY EXAMPLE and conduct yourself honestly, ethically and legally.



MAKE SURE your teams know and follow the code and all other governing workplace business practices, policies and procedures.



BE ALERT for any breaches of law or policy.



ENSURE employees feel comfortable raising issues and concerns.



HANDLE all reports correctly, escalating issues as required. Never turn a blind eye to issues.

Leaders:

If you are a Leader, you have additional responsibilities ...

- **Model the Code of Conduct and Capral's values.**

Promote a culture of integrity by making ethical decisions, and showing honesty and respect in everything you say and do. Never encourage or direct an employee to achieve a business result at the expense of breaching our Code of Conduct or the law.

- **Talk about the Code of Conduct.** Read the code, understand and apply it.
- **Be informed.** Recognise that you may not always find the answers that you need in the Code of Conduct, but know where to go for answers.
- **Expect the best.** Discuss the importance of compliance and let employees know you expect them to always do what is right.
- **Be responsive and create a "speak up" culture.** Encourage employees to come to you with questions or concerns. Listen to them carefully and offer guidance when they need help, including identifying available resources for reporting.
- **Ensure Compliance.** Always comply with Capral's Code of Conduct, Business Practices, procedures, policies, delegations of authority and any site specific rules.
- **Take action.** Look out for misconduct and act upon any breaches of this Code of Conduct.

As a Leader
you have an important
responsibility to serve
as a positive role
model.

Reporting concerns

If you sense that something is not right at work, or you see or hear about an act that may breach our Code of Conduct, you have a responsibility to share your concerns and report them to Management or Human Resources as soon as possible.

When you report concerns you help us handle issues appropriately. You also help build trust with each other, our customers and suppliers.

Where you can go for help...

Talk to either:

- Your Team Leader, Manager or General Manager
- Human Resources

Or contact: Capral's Whistleblower Hotline

This reporting service is run by an independent third party, is available 24-7 and allows you to remain anonymous. Contact details are available on Capral's Intranet.

Speak up

By asking questions and reporting concerns, you are doing the right thing and helping Capral stop or prevent misconduct.





Be safe and healthy

Prioritising the safety, health and environment of our workplace.



Be safe and healthy



Safety Principles

Capral prides itself on providing a safe and healthy working environment. Safety is our first priority, and we expect our employees to embrace our philosophy of 'Safety First'.

Each of us is responsible for working safely, sticking to our standards and caring for the health and safety of those around us. We are all responsible for making sure we are fit for work every day. To achieve this you must always:

- immediately stop any job or task that you believe is unsafe
- not be under the influence of alcohol or drugs, be well rested and physically and mentally fit to perform your job
- always address hazards and improper health and safety practices as soon as you become aware of them
- only use equipment that you are trained and authorised to use and for the purpose of which it is intended
- always wear the correct personal protective equipment (PPE) required for the task
- comply with Capral Business Practices, procedures, policies, work instructions and site specific rules

- ensure the highest standard of quality in products and services
- if ill or injured, actively participate in rehabilitation and return to work programs to promote recovery
- report incidents and injuries immediately.

We expect others we work with, including suppliers and contractors, to respect and work to our health and safety requirements. Familiarise yourself with Capral's Safety policies, site rules, procedures and work instructions and adhere to lawful and reasonable directions provided by Capral whilst you are in the workplace.

Be responsible...

We should all stop and report the work of colleagues if we think they are putting their health and safety – or that of others at risk.

If you are in doubt about any health and safety issues you should speak to your Team Leader or Manager for assistance.

Remember... that no task is so urgent that you cannot take the time to do it safely. ←



Be safe and healthy



Workplace violence

Capral prohibits violence, threats of violence, intimidation and other disruptive or anti-social conduct on company premises, and off company premises if the behaviour is an extension of the workplace, such as online bullying directed at a co-worker.

Smoking, vaping, drugs, and alcohol

Capral's position on substance abuse is simple; it is incompatible with the health and safety of our employees, and we don't permit it. Employees have a right to a workplace free from the effects of alcohol and drugs.

The possession, sale or use of illegal drugs on company time or property is prohibited. Impairment from alcohol or improper use of legal or illegal drugs while conducting company business is forbidden. Capral may conduct regular drug and alcohol testing to ensure that our workplace is safe and productive.

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

Be mindful

We all have a right to a workplace free from violence and the effects of alcohol and drugs. Do the right thing for everyone's physical and mental wellbeing.

Capral will not tolerate...



VIOLENCE

of any kind including threats of violence or intimidation to staff or visitors is prohibited.



ANTI-SOCIAL CONDUCT

Disruptive or anti-social conduct (horseplay and practical jokes) are not tolerated on premises.



ONLINE BULLYING

directed at a co-worker, supplier or customer is not accepted at or off company premises.



DRUGS

The possession, sale or use of illegal drugs, and improper use of legal drugs is banned.



ALCOHOL

Impairment from alcohol while conducting company business is forbidden.



SMOKING

is only permitted at site-designated areas and only during scheduled breaks.



Be safe and healthy



Our commitment to the environment

We are serious about our responsibility to the communities in which we live and work, as well as the broader global community.

At Capral, we take the responsibility of reducing our impact on the environment seriously. It remains essential to our core values that we maintain environmental standards and protect our shared future.

Capral maintains the following third party accredited management systems to ensure we constantly achieve high standards:

- AS/NZS ISO 9001:2015 – Quality Management Systems
- AS/NZS ISO 14001: 2015 – Environment Management Systems
- AS/NZS ISO 45001:2018 – Occupational Health and Management Systems
- ASI Performance Standard (V3 2022)
- ASI Chain of Custody (V2 2022)

We are committed to the continuous improvement of our environmental impact with the goal of developing a sustainable business.

If you become aware of any violation of environmental law, or any action that could cause or may appear to conceal such a violation, you should immediately report the matter to your Manager or ESG and Risk department.

Did you know?

At Capral, we're leveraging advanced technologies and optimising processes to reduce carbon emissions during production. Our commitment to precision and innovation helps meet the growing demand for low-carbon aluminium products, supporting a more sustainable future.





Be respectful

Everyone deserves a workplace where they can be treated equally and fairly.



Be respectful

Fair treatment

We respect diversity

in each other, in our customers and suppliers,
and all others with whom we interact.

Teamwork and respect are paramount at Capral. We know the way we treat one another has a significant impact on our shared work environment.

We all need to contribute to making our company a place where everyone is valued and treated equally. No one is to be singled out or treated badly because of any personal characteristic.

All employees deserve respect from, and are expected to show respect to, their co-workers.

Each of us must take responsibility and play our part in creating a positive work environment by respecting each other as individuals and acknowledging the value each of us brings to the workplace.

Remember...

each person is a
key player on our team
and deserving of
our respect.





Be respectful



We foster success

An important part of fostering a diverse and inclusive culture is making sure that men and women encounter equal opportunities to succeed at Capral. We are focused on increasing the number of female Managers and making sure there are ample opportunities for women to succeed.

Diversity and inclusion

We value diversity and inclusion, and the benefits they bring in achieving our objectives, enhancing our reputation, and attracting and retaining talented people. Through experience we know that different ideas, perspectives and backgrounds create a stronger and more creative work environment that delivers better results. Our customers should be able to see in our team members a reflection of themselves and their communities.

It is important that we strive to create an inclusive environment that celebrates the diversity of our team, making sure all team members feel valued, respected and empowered and free to bring their whole selves to work.

No discrimination

Capral makes employment and career development decisions based on merit. We affirm the fundamental principle that everyone is entitled to fair treatment and equal opportunity without discrimination.

Discrimination means treating someone less favourably because of a protected attribute. Examples of protected attributes include:

- gender, marital or relationship status, pregnancy, breastfeeding, parental status, carer's or family responsibilities
- sexual orientation, gender identity, intersex status or gender expression
- race, colour, descent, nationality, national origin, ethnicity or religion
- disability
- age.



Be respectful

No bullying or harassment

Capral will not tolerate bullying or harassment including (without limitation) sexual harassment.

Harassment can take many forms, but generally it is any unwelcome conduct that creates an intimidating, hostile or offensive work environment, or has the purpose or effect of unreasonably interfering with an individual's work performance.

Harassment does not require intent to offend. Inappropriate conduct meant as a joke, a prank or a compliment can contribute to harassment. Unwelcome behaviours, are not only unacceptable in our workplace, they may also be against the law.

If you believe this is happening to you (by anybody in our workplace), or if you think that this is happening to someone else, there are informal and formal ways to properly address this, including:

- speaking to the person in question, if you feel comfortable and safe doing so
- speaking to your Team Leader, their Manager or Human Resources.

Capral aims to maintain an environment free of unlawful harassment and unacceptable conduct and we take action to address such behaviour when we are aware of it. We do not tolerate behaviour that is discriminatory, harassing, disrespectful, or otherwise degrading to individual dignity. We are committed to protecting the rights of all employees.

Be aware of harassment

Inappropriate actions that are considered harassment include such things as:

- ✗ Unwelcome or improper comments, jokes, physical contact or gestures
- ✗ Sexual advances or requests for sexual favours
- ✗ Displaying or distributing sexually explicit or derogatory pictures or text
- ✗ Verbal or physical threats or abuse of any kind



Be respectful

Mental health and wellbeing

It is our aim to establish a culture where psychological safety is as important as physical safety. We want people to know that it's ok not to feel ok, and it's ok to ask for help. Capral is committed to developing a workplace culture that promotes the mental health and wellbeing of its employees by:

- 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.

Domestic violence

Capral is committed to creating a culture that supports respectful relationships, practices, positive attitudes and behaviours and promotes a culture of non-violence in all workplaces.

It is our objective to ensure employees experiencing domestic, or family violence are supported in continuing employment, in order to meet normal requirements of their life, and by providing appropriate leave as and when requested.



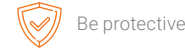
It's ok to
ask for help.

Capral supports employees with a range of personal and health services. If you need help or are concerned about your co-worker speak to us.

A man in a warehouse setting, wearing a high-visibility yellow vest over a grey shirt and safety glasses, looking upwards. He is standing in an aisle with tall shelving units filled with materials. The background shows industrial lighting and more shelving units.

Be protective

*Safeguarding what is ours -
our property, resources and information,
is important to our success.*



Be protective

Safeguarding Capral's assets and information

The buildings we work in, the technology that connects us to others, the ideas we develop, the emails we exchange, the vehicles we use to deliver our product, the computers and mobile devices we use to do our jobs and company information are Capral assets that we are each entrusted to protect.

Employees are responsible for safeguarding Capral's property, resources and information. You must use and maintain all property and resources with care and respect while guarding against waste and abuse. Capral's information and records are confidential to Capral and not permitted to be disclosed to external parties without management authorisation.

You must only use company property and resources in accordance with policies, practices and procedures. You must 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 or information without the approval of the appropriate management authority. Capral's property and information must not be used for personal use or gain, and all property and information must be returned to Capral before leaving Capral's employment.

Unauthorised photography, video and/or audio recordings are not permitted on Capral sites.



Electronic communication

While at work, we use the internet, email, software, computers, laptops, telephones, tablets, and other kinds of technology every day. We must ensure that we use this technology professionally, responsibly, with good judgement and in a manner that is consistent with our Code of Conduct.

Any messages you send should always be appropriate and in good taste, no matter which device or format you use. Employees must communicate in a professional manner when using computers for business purposes.

We are all responsible for securing and protecting computers, company networks, and electronic devices used in our jobs. Do not assume your communications are private. Information and messages that are sent, received or stored on Capral's email system are Company property. Capral may monitor, access, review and disclose all messages, documents and information sent, received or stored.

Intellectual property

As an employee, the things you create for Capral belong to Capral. This includes inventions, discoveries, improvements, ideas, software programs, artwork and works of authorship.

This work product is Capral property if it is created or developed, in whole or in part, on company time, as part of your duties or through the use of company resources or information.

Our brands are...

important to Capral's success, they are fragile and must be used carefully and protected from misuse.





Be protective

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. All public announcements must be approved by the Managing Director and released to the ASX by the Company Secretary.

Public information releases need to be approved by the relevant member of the Executive Team (direct reports to the Managing Director), with any significant matter being referred to the Managing Director for prior approval.

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

Important note:

Because we are a public company, there are laws that govern how we release certain business and financial information. This includes a requirement to disclose material information broadly and in a timely way.

If you are involved in the release or disclosure of financial information, you must know and follow Capral's Continuous Disclosure Policy. If you are not authorised to release this information, never share or publicise non-public information related to our operations or financial position.

Social media

The way in which Capral presents itself in the marketplace *is critical to our success.*

There are a small number of employees who are authorised to speak on the Company's behalf. If you are not one of those, make sure that your activity on the internet, social networking sites, blogs, chat rooms, or other public forums represents only yourself and your views and cannot be interpreted as speaking on behalf of the Company.

You can ensure this is the case by keeping your personal and professional lives separate online. Avoid mentioning Capral in your personal posts.

You should also not post online your opinions or any confidential or commercially sensitive information about Capral, our customers, your co-workers or the industry generally unless you are authorised to do so as part of your job.

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



Be accountable

When we do the right thing we show we truly care and respect the people we work with.



Ethical conduct

Employees must act in an ethical manner that is not misleading or deceptive when dealing with customers, suppliers or other related parties. You must act truthfully and fairly, making every effort to ensure that your words and conduct do not contribute to misunderstandings on the part of others who are dealing with Capral. We each have a responsibility to know and understand these requirements and to seek advice when we have questions or concerns.

Confidential information

We are all responsible for safeguarding Capral's confidential, non-public information including; contracts, pricing, sales information, employee personal information. Never disclose commercially sensitive or personal information to third parties without permission.

Be careful when using speakerphones and mobile phones and never discuss sensitive company information in public. Some employees may have access to customers and other financial or personal information. This information must be safeguarded at all times and only used for legitimate business purposes. Remember, your duty to safeguard proprietary and confidential information continues even after you leave the Company. If you are not sure about whether certain information is confidential, check with your Manager.

Think carefully before you...

disclose confidential or proprietary information and ask yourself:

- 1 Does sharing it help our business or will it benefit someone else?
- 2 Does the recipient need to know it?
- 3 Have you checked with your Manager to see if it's appropriate to disclose the information?
- 4 Are there any legal or contractual restrictions on our ability to share the information?
- 5 Does the recipient need to sign a confidentiality agreement or otherwise make a promise to protect what you share?

Examples of confidential business information

- Detailed sales information
- Business performance targets
- Product strategies
- New product information
- Pending personnel announcements
- Manufacturing processes and equipment designs

When in doubt, check first



Be accountable

Competition and consumer practices

Capral operates in a highly competitive marketplace. We may play hard, but we always 'Play Fair' and by the rules. We know that everyone benefits from a competitive marketplace, and we strictly follow Australian Competition Laws.

We build market share and brand loyalty by delivering quality products, not by engaging in unfair or anti-competitive practices. In certain circumstances, some agreements with customers, suppliers, or other business partners could have the potential to limit free and open competition.

If you are responsible for areas of our business where competition laws apply, make sure you know how the laws apply. Ensure you complete the regular Company provided competition and consumer training. If in any doubt check with your Manager.

Always deal honestly and fairly with customers. Promote positive business relationships and never take unfair advantage of anyone by misleading them. Be truthful about Capral and what we sell. Do not make any claims you cannot substantiate, inaccurate remarks about our competitors, or erroneous comparisons between their products and ours.

Non-compliance damages the reputation of Capral and exposes the Company and individuals to significant fines and, in some cases, imprisonment. This behaviour is not tolerated within Capral. Management advice should be sought immediately if there are concerns about fair dealing and competition laws.

TOPICS TO AVOID

The following topics should not be discussed with competitors:

- Our prices and costs
- Our customers and markets
- The terms we offer customers
- Proposals made to prospective customers

Do not discuss such matters either directly with a competitor, at events or at locations where our competitors may be present. While very general commentary may be permissible in some cases, it is best to avoid these topics altogether.



Conflicts of interest

We must always avoid conflicts of interest and be mindful of circumstances that could give the appearance of a conflict. Conflicts arise when our personal or private interests interfere with our objective judgement or job duties. Conduct all professional responsibilities and business transactions with the best interests of Capral and your co-workers in mind.

Understand the types of situations that can lead to conflict or the appearance of conflict. Potential conflicts should be disclosed to Capral management immediately. 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.



Here are just a few examples of conflicts of interest that you **MUST bring to Capral's attention:**

- Direct or indirect supervision of a family member, a member of your household, or someone with whom you have a romantic relationship.
- An ownership interest in a customer, supplier or competitor of Capral (excluding small investments in large publicly traded companies).
- Participating in a business transaction to your personal advantage based on information or relationships developed as a company employee.
- Holding a second job that interferes with your ability to do your regular job.

Trading in Capral Securities

As a Capral employee, you may become aware of confidential information that could affect Capral's share price. Confidential price-sensitive information should never be used or shared for personal gain. In addition to being a breach of Company policy, it is also against the law.

Our processes protect employees from inadvertently trading shares when confidential, price-sensitive information is known within the business. There are significant blackout periods wherein employees cannot buy or sell Capral shares.

Refer to Capral's Securities Trading Policy for details.

In all cases, employees should advise the Company Secretary prior to making a trade in Capral shares.



Gifts, benefits and entertainment

We value the relationships we have built with our customers, suppliers and other business partners. It is important that these relationships remain positive and ethical and not influenced by offers of inappropriate gifts or hospitality.

The exchange of gifts and entertainment is not abnormal in business. However, an overly generous gift can pressure the recipient to return the favour or feel indebted to the giver and potentially result in decisions that benefit the giver and create a conflict of interest.

Capral's policy is; we do not exchange or receive gifts or entertainment that attempt to influence a business decision improperly.

Good judgement should be used when giving or accepting gifts, hospitality, or entertainment in business settings. The appropriateness of entertainment must be dependent upon the existence of a business relationship that could benefit Capral. Employees should advise their Manager of any gifts, benefits, or entertainment received that exceeds a value of \$150.

Capral's Anti-Bribery and Anti-Corruption policy provide detail guidance regarding all gifts, benefits, entertainment and donations, but if still in doubt, employees should seek management advice about whether or not a gift should be accepted or entertainment engaged in or donation, gift or entertainment given.

Think it through

Before giving or accepting gifts, hospitality, or entertainment ask yourself:

- 1 WILL** this activity or relationship influence, or appear to influence, my ability to make sound and unbiased business decisions or otherwise interfere with my ability to do my job?
- 2 WILL** I personally gain something or will a family member benefit from my involvement in this activity based on my status as an employee of Capral?
- 3 WILL** I be using Company assets for personal gain?
- 4 WILL** my participation cause me to put my interests ahead of what's best for the Company?
- 5 WILL** public disclosure of the activity damage the reputation of Capral?

If you answered yes...

to any of the above questions, seek guidance from your Manager or Human Resources.



Additional employment

Whilst employed at Capral and prior to taking on any kind of additional employment with another business, employees must ensure that:

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

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 immediately to determine if there is a conflict of interest.

Personal information

Capral respects the confidentiality of its employees, and others with whom we deal. Personal information should be handled, used or shared only when there is a legitimate business reason to do so, and then only in accordance with applicable laws and company policy. Employees may request to view certain details contained in their personnel records and must inform Capral of changes to personal information and to ensure that all emergency contact information is current at all times.



We value
your privacy and treat all
confidential and personal
information in accordance
with company policy
and laws.



Be accountable



Personal presentation

Employees are expected to dress appropriately during work hours and when representing Capral. This means wearing professional and appropriate clothing at all times. Attire must never present a safety issue and must be in line with the dress standards of the business.

This includes:

- Wearing professional business attire
- Wearing appropriate protective or safety clothing as and when required
- Be clean, tidy and maintain a good standard of personal hygiene and grooming
- only wear authorised business logos or promotional clothing provided by Capral
- keep jewellery to an acceptable business-level standard.

If these requirements are not met, you may be directed to cease work without pay until such time as your presentation is to the required standard.

Statement of compliance

Management questionnaires at half-year and end of the year contain a Statement of Compliance with respect to this Code of Conduct and Senior Managers are required to certify compliance with the Code.

Thank you
for your commitment
to Capral and our
Code of Conduct.