

# BUSINESS ETHICS & CODE OF BUSINESS CONDUCT POLICY

Policy:	Business Ethics & Code of Business Conduct	Valid as of:	Jan 25
Released by:	CEO	Next review:	Jan 26
		Reviewed and issued annually	

This policy and associated procedures are a reflection of the principles outlined in the KAEFER Code of Business Conduct and should be read in conjunction with that document. It outlines KAEFER (the Company) expectations with regards to ethical practices.

The KAEFER reputation is built by the conduct and integrity of our employees, inappropriate behaviour could damage our reputation and put the company at a disadvantage.

Ethical conduct is that which is both morally correct and honourable. In order to positively influence our valuable reputation, we must conduct our business in a way that is not only ethical, but also legal and within defined regulations.

This policy not only deals with issues relating to ethical standards of business practice, but also outlines our approach to being a socially responsible employer (our commitment to protecting the environment, working sustainably, and supporting our local communities).

The aim of this Policy is to ensure employees, in all areas of the Company, understand the expectations and approach of KAEFER to high ethical standards of business practice and social responsibility and to ensure that all employees comply with local and national regulations, including industry specific regulations governing Company operations.

This policy and the KAEFER Code of Business Conduct serve as a broad framework; they do not address every situation in which questions of business conduct may arise, but should serve as a guideline as to expected behaviors to be used in all business activity.

This policy and the KAEFER Code of Business conduct applies to all employees. The principles should be observed during working hours and also during out of duty activities that touch on the interests of the Company or in situations in which employees are seen as representatives of the Company.

This policy statement must be read in conjunction with the with the KAEFER Code of Business Conduct and Business Ethics Procedure.

**All workers have a responsibility to be aware of the principles outlined in these documents and to apply them in practice. Failure to do so can result in disciplinary measures, dismissal and in some cases legal action.**

Signed:  \_\_\_\_\_ January 2025

*Next Review January 2026*