

Code of Conduct

Introduction

At Austin, we have a common set of Core Values that determine the behaviour of everyone working at Austin, across all divisions. These Core Values encourage everyone to act in a safe, responsible, caring and sustainable way when working with our customers, communities and shareholders. They guide the way Austin conducts itself as a business.

Our six Core Values are:

Safety	<i>First and foremost, always. It's in our hands.</i>
Quality	<i>In everything we do.</i>
Accountability	<i>We are responsible for our actions and results.</i>
Integrity	<i>We are honest, ethical and genuine.</i>
Innovation	<i>Using technology to deliver for our customers.</i>
Teamwork	<i>Together we make the difference.</i>

The Code is an overarching framework, supplemented by the other formal policies and procedures of Austin ("Policies and Procedures"), which everyone is required to adhere to in their duties and in conduct of their roles. If you become aware of any conduct that does or could breach any aspect of the Code or is otherwise inconsistent with Austin's Core Values, please notify the person set out in the section titled "Breach of Rules: How to make a report or disclosure" immediately. Refer to the section titled "Breach of Rules" generally for details about how to report actual or suspected breaches of the Code or other ethical concerns. Austin takes breaches of this Code of Conduct and all its Policies and Procedures very seriously.

Scope

The Code applies to all employees, directors, officers and senior executives of Austin, whether or not in a full/part time, temporary or permanent capacity, and all persons employed by Austin through any joint venture or alliance project. The Code also applies to independent contractors and consultants engaged by Austin (collectively referred to as "Employees"). It is the personal responsibility of everyone covered by the Code to understand and abide by the Code.

Commitment to the Code

Austin is committed to:

- delivering outstanding performance for its investors, clients and everyone working at Austin;
- operating its business openly, honestly and, with integrity and responsibility;
- maintaining a strong sense of corporate social responsibility; and
- conducting its business lawfully, ethically and responsibly, and in accordance with the standards set out in the Code.

The Code will be periodically reviewed to ensure that it is operating effectively, having regard to its objectives and the support it provides to Austin's Core Values.

Employees

Our Employees are critical to the overall success of the organisation and remain its most important resource. Austin is committed to providing a safe and healthy work environment that promotes consultation and participation at every level. Austin encourages open communication and aims to ensure that its Employees are kept informed of Austin's activities.

Austin will respect its people, encourage their input and ensure that they are treated in a fair and honest manner free of harassment, including sexual harassment, bullying, discrimination and victimisation.

Shareholders

Austin is committed to delivering value to its shareholders and maintaining transparency about its financial performance and growth. Austin will ensure that it complies with the spirit and letter of all applicable laws and regulations that govern shareholders' rights.

Financial Community

Austin is committed to safeguarding the integrity of its financial reporting and promoting accurate and consistent disclosure of its financial position, through proper review and authorisation. Austin will prepare and maintain its accounts fairly and accurately in accordance with the accounting and financial reporting standards that represent the generally accepted guidelines, principles, standards, laws and regulations of the country in which it conducts its business.

Clients and Suppliers

Everyone has an obligation to use their best efforts to deal in a fair and responsible manner with Austin's clients and suppliers and to assist Austin with its commitment to delivering quality products and superior service that meet the needs and expectations of our clients. Austin regards ethics, honesty and clear communication as the cornerstones of its reputation, which enables Austin to build successful and lasting business relationships.

Behaviours

Austin is committed to providing a safe workplace that is free from harassment, including sexual harassment, discrimination, bullying and victimization, where diversity and inclusion is valued and supported. Austin achieves this through adherence to the Core Values outlined above. These Core Values define the expectations placed on everyone working at Austin and are the foundation of Austin's workplace culture.

We expect everyone working at Austin to:

- perform their duties with skill, honesty, care and diligence, using authority in a fair and equitable manner;
- abide by Policies and Procedures, instructions and lawful directions that relate to their responsibilities and duties;
- ensure they take reasonable care for their own safety and health while at work and that of others who may be affected by their actions or omissions;
- provide accurate information, give prompt attention and not discriminate on any unlawful grounds when dealing with people in the course of their duties;
- treat all people they deal with in the course of their work with respect and courtesy;
- not engage in bullying, harassment, including sexual harassment, discrimination, vilification or victimisation;
- deal with clients and suppliers fairly;
- not take advantage of the property or information of Austin or its clients or suppliers for personal gain or to cause detriment to Austin or its customers;
- to avoid conflicts of interest and understand that even the appearance of a conflict can be damaging;
- behave in a manner that maintains or enhances Austin's reputation; and
- comply at all times with the laws and regulations that govern our business and activities.

Conflict of Interest

Conflicts of interest, whether actual, potential or perceived, must be appropriately disclosed and managed.

A conflict of interest arises when an individual's position within Austin or their financial or other personal considerations or interests (whether direct or indirect), have the potential to affect, or could have the appearance of affecting, their judgement, objectivity or independence. An indirect interest includes but is not restricted to:

- a) an interest of a member of an employee's family; and
- b) an interest of a corporate entity or other legal entity associated with the employee or the employee's family.

A conflict of interest may include, but is not limited to:

- a) participating in business activities outside of Austin, including directorships, employment or public office;
- b) holding investments in businesses that are suppliers to Austin or which Austin has or may invest in;
- c) using property or information belonging to Austin for personal gain or the benefit of close relatives or friends; or
- d) receiving money, property, services or gifts, hospitality or entertainment from suppliers or other third parties doing, or proposing to do, business with Austin.

If any actual, potential or perceived conflict of interest arises between your personal interests and your duties and obligations to Austin, you must disclose it to, your Line manager and HR leader. Where applicable, they in turn may decide to involve the General Manager or relevant senior leader, such as the Company Secretary or Managing Director, in order to make arrangements to manage the conflict of interest.

You are also required to seek prior approval for any outside business interests including non-Austin work, business ventures, directorships, partnerships, paid speaking engagements or other interests which have the potential to create a conflict of interest. You must inform your Line Manager and HR leader if you are considering an outside business interest and Austin will review each request on a case-by-case basis. If any conflict cannot be effectively managed or resolved, you may be required to take action which satisfies Austin to remove the conflict.

Information

Use of Information

Individuals must not use or disclose any commercially sensitive or confidential information that they obtain through their work with Austin, other than in the proper performance of their duties for Austin or as required by law. This includes information about clients or their projects. If unsure, individuals must discuss the matter with their Line Manager.

Information obtained at work or held in Austin records, including client or customer information, should not be used to obtain financial reward or any other benefit, or to take advantage of another person. All documentation, whether in electronic or in any other form relating to the individual's work or the business or affairs of Austin is the property of Austin unless otherwise agreed by Austin.

On termination of the individual's employment or engagement with Austin, no documentation or information relating to the individual's work or to the business or affairs of Austin is to be removed from Austin, or retained for any reason.

Insider Trading and confidentiality

In the course of your work with Austin, you may learn information about Austin or other companies (a competitor, customer or supplier etc.) before it is made public. Using this information for your financial or other personal benefit or conveying this information to others may be illegal.

Individuals must ensure that any trading of Austin securities that they are involved in complies with the *Corporations Act 2001* (Cth) and *Corporations Regulations 2001* (Cth) (particularly the prohibitions on insider trading) and Austin's Share Trading Policy. Inside information is information about a company that is not available to the market and if it were made public, it would be likely to have a material impact on a company's share price. In general terms, insider trading occurs when a person trades in the securities of a company when they are in possession of inside information, or they share this information with any other person. It may also be a breach of your confidentiality obligations to Austin, to

disclose confidential information, whether or not the information is used to deal in Austin's relevant securities. If you are unsure whether an activity is, or could be perceived to be, insider trading, you should seek advice and discuss the matter with the Company Secretary.

Intellectual Property

Austin's intellectual property includes information, processes and technology developed by individuals as part of their roles. Austin relies on its intellectual property to give it an advantage in this highly competitive industry. It is the responsibility of everyone to protect its intellectual property.

Customer, client, or supplier intellectual property includes information, processes and technology developed and owned by Austin's customers, clients, or suppliers. It is everyone's responsibility to protect the intellectual property of Austin's customers, clients, or suppliers and to only use such intellectual property for the purpose for which it is provided.

If you are unsure whether a document contains Austin's or a third party's intellectual property, you should discuss the document with your Line Manager, prior to disclosing that document to anyone outside of Austin.

On termination of your employment or engagement with Austin, no documentation containing Austin's intellectual property is to be removed from Austin or retained for any reason.

Release of Information

Individuals must not disclose information about or belonging to Austin or information of its clients or customers which is not public or make public comment in respect of Austin or its clients or customers, directly or indirectly, without the prior approval of the Managing Director. If individuals are solicited by the media for information, they should direct the media to the Managing Director.

Property

Using Austin Property, Money, Goods or Services

Individuals are expected to use Austin property, funds, facilities and/or services efficiently, economically, and for authorised purposes only in accordance with designated financial authority.

Travel and Entertainment

Travel and entertainment must be consistent with the needs of the business and in line with the Travel Guidelines and Policy. It is the intent of Austin that individuals neither lose nor gain financially as a result of business travel and entertainment.

Those who approve travel and entertainment expenses are responsible for the propriety and reasonableness of expenditures, ensuring that expense reports are submitted promptly, and that receipts and explanations properly support reported expenses.

Anti-Bribery and Anti- Corruption

Austin is committed to responsible corporate governance and to conducting its business lawfully, ethically, honestly and with integrity. Austin will not tolerate any bribery or corrupt behaviour that is intended to improperly influence a decision or outcome to obtain a commercial advantage for Austin or its Employees.

Austin has implemented and disclosed on its website an Anti-bribery and Anti-Corruption Policy to illustrate its commitment and standards to preventing bribery and corrupt practices. The Policy outlines Austin's management of gifts and benefits, which protects our people and minimises potential negative consequences for individuals and Austin.

The Policy applies globally. If you are travelling outside of your home country, you are subject to the laws of the country you are in, however, the principles of this Policy must be followed regardless.

A breach of anti-bribery laws or anti-corruption laws is a serious offence that can result in fines and imprisonment.

Gifts, Entertainment and Hospitality

Accepting gifts, entertainment or hospitality must always be done in accordance with the law.

Austin prohibits all Employees from receiving money, property, services or gifts, entertainment or hospitality from suppliers or other third parties doing, or proposing to do, business with Austin, where doing so might amount, or create the impression of a benefit amounting to bribery or corruption.

Employees must declare and report any gifts and/or benefits, either offered or accepted and valued at AU\$50.00 or more. Employees must notify their Manager within 5 (five) business days of receiving/being offered the gift and/or benefit and include any relevant details, such as the date, description, estimated value and the source of the gift or benefit. If it is known in advance, the receipt of the gift and/or benefit should be discussed with your Manager prior to acceptance. Gifts should not be accepted on a reoccurring basis or broken down into parts of less than AU\$50.00.

This table outlines the types of activities that could be associated with bribery and corruption and are therefore prohibited.

Bribery	<p>includes the offering, promising, giving, accepting or soliciting of an advantage as an inducement for action which is illegal, unethical or a breach of trust.</p> <p>A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage. It can take the form of gifts, loans, fees, kick-backs, rewards, reciprocal favours or other advantages e.g. donations.</p> <p>A bribe could be either a direct or indirect promise, offering, or authorisation, of anything of value designed to exert improper influence. It may involve procuring an intermediary or an agent to make an offer which constitutes a bribe to another person, or whether a bribe is made to an associate of any person who is sought to be influenced.</p>
Corruption	<p>is the dishonest or fraudulent misuse of a position of power, influence or the terms of a person's employment, in order to gain, directly or indirectly, a benefit by:</p> <ul style="list-style-type: none"> (i) acting or not acting in a certain manner; or (ii) the misuse of information or knowledge held by the person for a reward, including creating or using falsified documentation, or concealing or destroying documentation.
Facilitation Payments	<p>are unofficial payments made to expedite or facilitate the performance of a public official for a routine governmental action. This includes for example:</p> <ul style="list-style-type: none"> (i) processing papers; (ii) issuing permits; and (iii) other actions of an official, <p>In order to expedite performance of duties of a non-discretionary nature (i.e., which they are already bound to perform).</p> <p>The payment or other inducement is not intended to influence the outcome of the official's action, only its timing.</p>

Secret Payments	are usually commissions or payments received by an agent or representative without the knowledge of their principal. Such a payment is made as an inducement to influence the conduct of the principal's business.
Political Contributions	are financial contributions to politicians or political parties with the expectation of favour. Austin will only participate in political activities in an ethical and legal manner. Employees may participate in their own capacity as an individual in political processes, provided it is understood and made clear that in doing so, you are not representing Austin.
Charitable Donations and/or Contributions	Charitable donations and contributions are generally acceptable, whether of in-kind services, knowledge, time, or direct financial contributions. However, Employees must be careful to ensure that charitable contributions are not used as a scheme to conceal bribery. Austin may only make charitable donations that are legal and ethical under local laws and practices. In Australia, this means that an organisation must have deductible gift recipient status with the Australian Taxation Office. This status makes the organisation entitled to receive income tax deductible gifts and deductible contributions. You must have prior written approval from the Chief Executive Officer for any donation or contribution offered or made on behalf of Austin.

How to raise a concern

Please refer to Austin's Whistleblower policy on the Company's website.

Health, Safety and Wellbeing

At Austin, the health safety and wellbeing of our people is an integral focus of our everyday activities as we aim to achieve an injury free work environment.

Our priority is to ensure that everyone goes home healthy and safe every day and to create a workplace free from psychological harm where our people can thrive and raise any concerns openly.

It is everyone's responsibility to take reasonable care for their own health and safety, and the health and safety of others.

Employees must carry out risk assessments in the workplace consistent with Austin's Global Safety and Health Policy, to identify potential safety issues and hazards, and implement controls to eliminate or minimise the risk to the health and safety of Employees, as is reasonably practicable.

All safety incidents must be reported promptly, including all injuries and near misses, so all Employees can be cared for and investigations can take place to make the workplace safer.

Employees are expected to be fit for work and able to perform their role safely. This includes not being impacted by tiredness, alcohol or drugs. If Employees are not fit to work, they must tell their Manager in accordance with Austin's Global Safety and Health Policy.

Environment

To work effectively in a diverse range of environments and social settings, Austin recognises the importance of integrating environmental management into how we do business.

As outlined in Austin's Environmental Sustainability Policy, the objective is to achieve high standards of environmental care and reduce the carbon footprint in conducting our business, where practicable. Austin's global approach to the environment seeks to understand, prevent or minimise adverse environmental impacts and contribute to the resilience of the natural environment at every stage of our operations.

A copy of the Environmental Sustainability Policy is linked to the corporate governance section of the Austin website.

Austin aims to make ethical and transparent strategic decisions that take into consideration present as well as future needs of the environment, in a manner consistent with our key business priorities and the expectations and values of the global community in which we do business.

Communications and Systems

Computer Equipment and Electronic Communications

Austin issues its Employees with standardised computer equipment and accessories required to effectively perform their duties, whilst also providing any technical assistance required.

The computer equipment and software assigned to Employees remains the property of Austin and shall be used in accordance with Austin's IT policies and procedures. By using such equipment, Employees agree to comply with these conditions.

Employees are prohibited from accessing or transmitting illegal, inappropriate or offensive websites (including sites of a pornographic or racial/ethnic nature), and downloading or sharing of unauthorised software, the transgression of Group software licenses or other copyrighted material is strictly prohibited.

Everyone using Austin's systems and resources must do so responsibly and lawfully and in compliance with this Code and Austin's Policies and Procedures.

Electronic communications, including but not limited to emails, content or comments in private messaging groups or social media, that are obscene, defamatory, threatening, harassing, discriminatory or hateful to any person, group or entity of Austin, are prohibited.

Austin has a legal obligation to report any illegal violations to the appropriate authorities.

Social media

Electronic communications and postings on social media and/or the internet, are "public" and difficult to permanently withdraw. They can have a lasting impact, sometimes damaging, for the person making them and anyone mentioned in them or associated with them, including Austin. They can also have legal ramifications.

Your responsibilities as an Employee at Austin continue when using the internet, or other social media, even if this occurs using your own electronic device, and/or in your capacity as a private citizen, outside the workplace and outside business hours. Examples include, but are not limited to, Facebook, LinkedIn, Twitter, blogs or personal websites.

When using social media and the internet, Employees must:

- a) act consistently with this Code and Austin's Policies and Procedures; and
- b) not disclose Austin's confidential information; or cause harm to our reputation.

Employees must not send or post disrespectful or otherwise inappropriate, intimidating, offensive, false or malicious comments or information about Austin, other Employees including supervisors to managers, or any current or former customers or associates of Austin.

If a third party sends or posts material on any social media initiated or activated by an Employee that would contravene this Code, Employees are expected to use their best endeavours to have the post removed.

Any activity which represents a failure to meet these obligations may be determined as misconduct or serious misconduct resulting in disciplinary action and termination of employment.

Branding

The Austin brand is an essential part of Austin's public identity. The external use of all Austin names and/or logos must be used in accordance with Austin's Style Guide. Employees must report unauthorised use of Austin's name and/or logo to the Company Secretary.

Compliance

Competition

Austin is committed to full compliance with competition laws, including the Competition and Consumer Act 2010 (CCA) and any relevant legislation in other countries in which Austin operates.

Competition laws promote competition and prevent anti-competitive trade practices such as bid-rigging, market sharing and price-fixing. Competition laws also aim to protect consumers through a range of measures including the prohibition of misleading or deceptive conduct and prohibiting certain unfair marketing practices.

Employees must not engage in anti-competitive behaviours such as co-ordinate bidding, discussing tenders or terms such as pricing formulae, discounts, margins, rebates, commissions or credit terms with competitors or agreeing with potential competitors on whom to deal with or not to deal with.

Employees must consider the appearance and implications of interacting with a competitor or potential competitor, whether in a business or personal setting.

Employees must reject and report to the Company Secretary any attempt to collude on tenders or to engage in any anti-competitive conduct. Employees must also ensure that any agreements or arrangements with competitors are reviewed by the legal department for legal risk.

Anti-competitive behaviour can expose Austin and Employees to civil and criminal penalties, as well as financial and reputational harm.

Continuous Disclosure

As a publicly listed company, Austin has continuous disclosure obligations to ensure trading in its shares is conducted on a fair and fully informed basis.

Austin is obliged (subject to specific exceptions) to advise the ASX of any information that a reasonable person would expect to have a material effect on the price or value of Austin issued shares ("market sensitive information") promptly and without delay.

If you think you possess market sensitive information that may require disclosure or have released material information that has not been disclosed to the public, you must report it immediately to your Line Manager. Line Managers are then responsible for notifying their General Manager who are expected to provide this information to the Chief Executive Officer or Company Secretary (Disclosure Officers) as soon as possible.

If the Disclosure Officer believes that information must be disclosed, the Disclosure Officers must seek approval from the Board for disclosure of the information (providing the Board with a reasonable opportunity to consider the form and

content of the ASX announcement in which the disclosure will be made), unless that is not possible or practical having regard to all the circumstances and the requirements of the ASX Listing Rules.

Where it is not possible or practical to seek the Board's approval (recognising the requirement to disclose market sensitive information promptly and without delay), the Disclosure Officers will determine whether particular information should be disclosed to the ASX, and the form and content of any disclosure.

A copy of the Continuous Disclosure Policy is linked to the corporate governance section of the Austin website.

Internal Controls

Austin has established various financial and accounting control standards to ensure that assets are protected and properly used. Employees share the responsibility for maintaining and complying with the required internal controls and are required to maintain accurate and reliable financial records and reports.

Inclusion and Diversity

Inclusion and diversity is fundamental to Austin's Core Values and workplace culture.

Austin is committed to fostering an inclusive culture where everyone feels safe to bring their whole selves to work and be comfortable to speak up or ask questions without fear of retaliation. Everyone is expected to treat others equally and with kindness, inviting different perspectives, voices and cultures.

All Employees must be aware of their responsibilities under the Diversity Policy to support and promote equality of opportunity.

A copy of the Diversity Policy is linked to the corporate governance section of the Austin website.

Bullying, Harassment (including Sexual Harassment) and Discrimination

Everyone should be treated with dignity and respect and have the opportunity to reach their full potential. We all have a responsibility to prevent harmful behaviours, including bullying, sexual harassment, discrimination, intimidation or harassment of any kind when working at Austin. These types of conduct may also be unlawful and a criminal offence.

All Employees are required to be familiar with Austin's Discrimination, Bullying and Harassment Policy. A copy of Austin's Discrimination, Bullying and Harassment Policy is linked to the corporate governance section of the Austin website.

Breaches of the Code

All Employees have a responsibility to observe the letter and spirit of the Code and to ensure its requirements are not breached. It is Austin's expectation that Employees take responsibility for behaving in a manner consistent with the Code and for upholding Austin's Core Values.

Those in positions of leadership and management (including Directors and senior executives) have an additional responsibility for setting an appropriate example for others in the organisation; by speaking, acting and otherwise behaving in a manner consistent with the Code and Austin's Core Values.

If an Employee does not follow the standard of conduct outlined in the Code, they may be subject to disciplinary action, including but not limited to termination of employment.

What to do if you suspect a breach of the Code or need to disclose something

Employees are strongly encouraged to report any suspected breach, or any other ethical issues raised by the Code, to Austin.

The Discrimination, Bullying and Harassment Policy details how to report any suspected breaches of Austin's expectations in relation to workplace behaviour.

Austin has also established a Whistleblower Policy in relation to the reporting of suspected breaches which are not personal work-related grievances. The Whistleblower Policy aims to ensure that Employees who make such reports are supported, and wherever possible, are protected from any detrimental consequence as a result of their disclosure. A copy of the Whistleblower Policy is linked to the corporate governance section of the Austin website.

How to make a report or disclosure

Employees have several options for reporting breaches of the Code or making any of the disclosures it requires. You can raise any issue with your line manager or HR leader, or the appropriate nominated person below:

Potential Conflicts of Interest -	Company Secretary
Potential Insider Trading -	Company Secretary
Accepting/ Giving Gifts -	Your Line Manager
Potential Bribes/ Facilitation Payments -	General Counsel
Potential Anti-Competitive Conduct -	General Counsel
Potential Price Sensitive Information -	Managing Director or Company Secretary
All Other Potential Breaches of the Code of Conduct -	Human Resources Leader

If your concern or issue relates to one of the people on this list, you may report the matter to any other person on the list. Alternatively, Employees wishing to make a report or a disclosure can also email the Austina Whistleblower email address and your concern will be managed by Austin's Whistleblower Officer. For more information, see Austin's Whistleblower Policy.

Procedure after a report or disclosure is made

Any Employee who in good faith, makes a complaint or disclosure about an alleged breach of the Code, and follows the reporting procedure will not be disadvantaged or prejudiced because they came forward.

Austin treats every report of a potential breach of the Code sensitively, respectfully and confidentially (so far as is practicable). Once a concern is raised, it will be assessed and dealt with in accordance with Austin's Whistleblower Policy, where appropriate, or Austin's relevant Policy and/or Procedure.

A prompt investigation may take place to address the complaint or disclosure made. This will depend on the nature of the report and the amount of information provided. The Employee who made the complaint or disclosure will be informed of the outcome, where appropriate. The particular circumstances of each case will determine the appropriate level of detail contained in the report back to the Employee.

Any investigation of a complaint or disclosure will be guided by the following principles and considerations:

- investigations and decision making will be conducted efficiently, fairly and free from bias;
- subject to any confidentiality requirements, those alleged to have breached the Code will have the opportunity to respond to any complaints or evidence against them;
- conduct which breaches the Code may have serious legal implications for the individuals involved and there may be obligations on Austin to report some breaches of the Code to authorities, such as the Police.

If in doubt, seek advice from HR or the General Counsel on this issue.

Administration

Responsibility for the administration of the procedures relating to the Code lies with the Head of Sustainability. Any complaints or disclosures relating to the Code that are received by supervisors or managers should be forwarded to the Head of Sustainability for further action. Serious complaints or disclosures should be reported to the Chief Executive Officer and the Company Secretary.

Framework for Ethical Decision Making

Individuals are encouraged to use the following framework when deciding a course of action

1. Recognise the event, decision or issue;
2. Think before acting;
3. Decide on a course of action;
4. Test the decision by reviewing the "ethics questions to consider" below;
5. Consider Austin's Values, this Code, relevant policies and procedures and relevant laws and regulations; and
6. Proceed with confidence.

Ethics Questions to Consider

In making a decision, individuals are encouraged to ask themselves the following questions:

1. Is it against Austin's Core Values?
2. Does it feel right?
3. Is it legal?
4. Will it reflect negatively on you or Austin?
5. Who else could be affected by this decision?
6. Would you be embarrassed if others knew you took this course of action?
7. Is there an alternative that does not pose an ethical conflict?
8. How would it look if your decision was in the media?
9. What would a reasonable person think?
10. Does it comply with this Code and relevant Policies and Procedures?



Sy van Dyk
CEO and Managing Director
1 July 2025