

*Our Code of Business Conduct (Our Code) is
our guide to doing the right thing.*

*Our Code explains what we expect from anyone who works for, or on behalf of, Nelson Brothers.
Our Code gives us a shared understanding of how we will conduct ourselves as we work together
to deliver on the purpose, vision, strategy, and principles of
[Our Core Values](#)*

IT IS EVERYONE'S RESPONSIBILITY

We expect everyone who we deal with to demonstrate [Our Core Values](#) and to comply with relevant laws and regulations, the requirements set out in Our Code, and any company policies, standards, and procedures that apply.

This means you must:

- Demonstrate that you have read, understand and will comply with the standards of Our Code.
- Comply with all applicable laws and regulations. Compliance with the law means observing the letter and spirit of the law as well as conducting business so that Nelson Brothers and its employees are recognized as 'good corporate citizens'.
- Complete any training about Our Code and any other required training.
- Act to avoid, prevent or stop practices that could harm yourself, a colleague, customer, partner, the community, environment, or our business.
- Speak up and report if you see or suspect something is wrong.

YOUR GUIDE

The way we act when working for, or on behalf of, Nelson Brothers influences what our customers, communities, suppliers, regulators, shareholders and our colleagues think of us. Our Code is our guide to doing the right thing. This guide summarizes our expectations.

SAFETY IS OUR PRIORITY

THE MOST IMPORTANT THING IS THAT WE ALL RETURN HOME SAFELY, EVERY DAY.

We deliver this by expecting our people to:

- Follow safety controls and stop unsafe work.
- Be fit and able to work safely.
- Ensure the security of our people and products, always.

Follow Safety Controls and Stop Unsafe Work

Acting responsibly to protect your own safety and the safety of the people and communities you work with is the most important thing you do, every day. There are risks in our work, however by following safe operating practices and ensuring effective safety controls, we can prevent or mitigate hazards or other causes of potential harm.



WHAT MUST YOU DO?

Be responsible for your own safety by knowing and following all operating and safe work procedures that apply to your role and location or make suggestions for improvements where there are safer ways of working. Remember to be mindful of any risks and stay focused on doing things safely. If you are a manager, you must be vigilant and ensure your people know what's required, and are capable, trained and empowered to act.

BE FIT AND ABLE TO WORK SAFELY

You are responsible for ensuring you present to work fit and able to work safely. Being aware and protecting yourself from physical harm while at work, including when traveling for work, means being prepared, taking precautions and using protective equipment when appropriate.

WHAT MUST YOU DO?

Come to work in a condition where you are fit to perform work safely. In some roles, where permitted by applicable laws, you may also be required to participate in periodic medical assessments and fatigue management, and drug and alcohol and occupational hygiene monitoring programs. This is to ensure the safety of the workplace or to comply with the law. If you are taking medication, including prescribed medicine, know what effect it might have on you and advise your manager if necessary. When travelling, ensure you are prepared for potential risks to your health or safety.

ENSURE THE SECURITY OF OUR PEOPLE AND PRODUCTS

The security of our people and products is of paramount importance for the safety of those working with us, the community and our customers. Identifying, maintaining and following controls is how we contribute every day to ensuring our people, plant, equipment, buildings, products and raw materials are secure.

WHAT MUST YOU DO?

Follow all processes designed to control access, security and performance of Nelson Brothers sites, buildings, equipment and vehicles. We also expect you to ensure that any controls relating to the handling, storage, transportation and use of our raw products are understood and always followed.

WE RESPECT AND VALUE ALL

Our care for each other, our customers, suppliers, partners, communities, and the environment helps to build positive and trusted relationships.

We deliver this by expecting our people to:

- Value others and respect human rights.
- Work with and support our communities.
- Care for the environment.

Respecting the rights of others and supporting equal opportunity is a core part of who we are at Nelson Brothers. We are united by Our Core Values and celebrate our unique differences. As a member of our diverse community, we expect you to contribute to an inclusive, collaborative, positive and healthy environment in which we can all succeed. Discrimination and harassment are explicitly prohibited. Exclusionary behaviors and language – regardless of whether they rise to the level of harassment – are also unacceptable. Nelson Brothers is committed to building a responsible and inclusive culture that respects the rights of our workforce and those impacted by our operations and business relationships in the communities in which we operate.



WHAT MUST YOU DO?

Be inclusive and treat everyone fairly and equally. Always respect people's dignity and rights, especially those considered vulnerable such as women, children, minority groups, and Indigenous Peoples, whether it be in our workplace or communities.

Ensure any actions taken or decisions made on behalf of Nelson Brothers are free from discrimination, harassment, bullying, vilification, or any unacceptable behavior. Disciplinary action, up to and including dismissal or termination of contract, can be taken against someone who takes part in this type of behavior. This means:

- It is never acceptable to discriminate and treat someone less favorably because of their age, sex, gender identity or intersex status, race, color, nationality or ethnicity, social origin, marital, relationship, pregnancy or carer status, physical or mental disability, religion or political opinion, sexual preference, trade union activity, or some other characteristic. The basis for appointment, advancement, performance appraisal and remuneration within Nelson Brothers is competence, performance and behavior in line with Nelson Brothers's values.
- It does not matter what you intended, harassment is an act that is unwelcome, offensive, humiliating or intimidating. This includes sexual harassment which occurs when a person engages in unwelcome conduct of a sexual nature, including an unwelcome sexual advance or an unwelcome request for sexual favors.
- Bullying is unacceptable and includes behaving in a way that is unreasonable, persistent or repeated, demeaning, undermining or humiliating, and which puts someone's safety and health (including mental health) at risk. This does not include reasonable performance direction or feedback.
- We will not tolerate behavior that publicly vilifies and encourages hatred, contempt or severe ridicule for a person or a group. If it contains threats of physical harm toward someone or their property, it can also be a criminal offence. This includes posts made on social media.

When engaging with a supplier, contracting with another party or hiring labor, take steps to ensure that any third party meets our requirements and shares our commitment to human rights, and decent work conditions.

WORK WITH AND SUPPORT OUR COMMUNITIES

Developing strong, trusted relationships with our community stakeholders (including local government) is vital for the success of our business and fundamental to securing our license to operate. This means adopting an inclusive, respectful and responsive approach to community engagement, minimizing our negative impacts on our host communities, and actively looking for opportunities to deliver meaningful and long-lasting economic and social outcomes.

WHAT MUST YOU DO?

Look for ways to minimize any negative impacts and identify opportunities where we can contribute positively including local procurement, sponsorships, community investment and donations to impactful charities.

Nelson Brothers supports local communities and contributes by sponsoring local events and groups, making community investments, and donating to charitable causes.

We consider the circumstances for all sponsorships, donations or community investments to ensure our funding benefits the intended recipients and aligns with our values. We will never provide any contribution or support to reward or influence anyone to perform their work duties improperly or to give Nelson Brothers an improper business advantage. All industry memberships must be approved.



If you approve advertising or use of the Nelson Brothers brand, ensure it complies with our guidelines and protects our rights, standing and reputation.

CARE FOR THE ENVIRONMENT

We care about the environment and take our environmental responsibilities seriously. It is important to understand how our activities impact the environment and use the right controls to mitigate risks to operating in a sustainable and responsible way. Excellence in environmental management and performance is essential to our ongoing business success.

WHAT MUST YOU DO?

Ensure you understand our environmental responsibilities and obligations. Take time to identify activities that could have an impact on the environment, including loss of product. Prevent spills from occurring and safely clean up any product, raw material, or chemical loss immediately; also, promptly report any spills of hazardous materials to the local Safety and Compliance representative.

If you see something wrong, stop and immediately act on it. If you suspect there could be an environmental incident, talk to your manager or a Safety and Compliance representative.

WE ACT WITH INTEGRITY

We are open and honest, and we do what is right.

COMPLY WITH TRADE CONTROLS

Nelson Brothers is subject to international trade control laws including trade sanctions and export control laws. Trade sanctions are laws that prohibit direct and indirect trade with certain individuals, entities and countries. Direct and indirect sales to some countries require us to obtain specific government permits. Export control laws restrict our ability to export certain products and technology without first obtaining permits from relevant authorities.

All trade control laws are intended to implement the foreign policy and national security objectives of the jurisdictions in which we operate, including the prevention of terrorism. Any transactions in breach of these laws may constitute a criminal offense, for you as an individual, and for Nelson Brothers. It could also create serious risks to public security and harm our reputation and our license to operate.

WHAT MUST YOU DO?

To avoid breaching any trade control laws you must ensure any counterparties, suppliers, or customers are onboarded appropriately, screened and validated through due diligence.

If you are involved in exporting from the United States or exporting goods that contain United States origin content or technology, you must be familiar with export licensing requirements.

SAY NO TO BRIBERY AND CORRUPTION

Operating with integrity means we will never offer, promise, give, or approve anything of value to improperly influence a decision by a government official or to achieve a business advantage. Refusing to participate in bribery or corruption may sometimes cause delays or difficulties, but we will never compromise our value of integrity to achieve a business outcome.



Giving or receiving any corrupt payments or other value items - including bribes, kickbacks, low value payments to expedite a routine task or service, donation, secret commissions, offers of employment or offers of contracts for services - is wrong and against the law.

This also applies to our suppliers, and we take steps to ensure that third parties who interact with others on our behalf, understand and live up to our commitment to integrity. Regardless of who makes the payment, Nelson Brothers and anyone involved could be subject to criminal penalties, fines or imprisonment. Our valued relationships with customers and host governments could also be damaged.

WHAT MUST YOU DO?

Make sure your customers know that you understand these obligations. If you ever feel pressured to participate in bribery or corrupt activity you must resist and speak up. Always question any suspicious payments or suggestions, even if they are made or suggested by, or through, a partner or third party. Always seek advice from your legal team.

If you are likely to face situations where you might be asked to make a suspicious payment, prepare yourself with strategies to help you respond. This could include explaining that you could lose your job at Nelson Brothers for making an undocumented payment, asking to speak to a more senior official, insisting on an official receipt for any payment, or stating you need to seek advice from someone in Nelson Brothers. If you are forced to make a payment because of an immediate risk to your safety, or a colleague's safety, then you may do so, however you must report without delay to your manager and through the legal team.

If you become aware of any actual or suspected bribe from or to a Nelson Brothers employee, or a request for a bribe from or to a Nelson Brothers employee, you must report this as soon as possible to the legal team.

PROTECT CONFIDENTIAL INFORMATION

Information and data stored on Nelson Brothers's systems must not be disclosed externally unless it is already publicly available or covered by an agreement with those receiving it. Product specifications and formulations, pricing, vendor lists, sales or operational details, and manufacturing practices, either of ours or our customers, may be proprietary information and must only be shared with authorized people with approval.

WHAT MUST YOU DO?

Take appropriate care to protect Nelson Brothers' and our customers' information from loss or unauthorized access or disclosure. Confidential or proprietary information should be treated with extra care.

If you are approached by the media or investment community, refer them to an authorized spokesperson.

PROTECT DATA PRIVACY

As we go about our business, we come into possession of information about employees or external stakeholders such as customers and suppliers. Nelson Brothers respects and is committed to protecting the privacy of all individuals and complying with the law and ensuring that the management of employee information balances the individual's right to privacy with legitimate business needs.

We only collect, hold, use and disclose employee or third-party information when it is necessary for a business purpose (such as paying employees). We hold this information while the collection purpose remains and if it is needed, to defend any legal claims.

WHAT MUST YOU DO?

You must comply with Our Code, Nelson Brothers's privacy statement and relevant local legislation. By working with Nelson Brothers, you agree that your personal information can be processed (including



disclosure to Nelson Brothers companies, suppliers and regulators worldwide) and that you will handle the personal information of others only when reasonable and necessary for Nelson Brothers business purposes. These business purposes include monitoring your use of our systems or devices to check compliance with the law and Our Code.

Limit personal information you store on our systems. Never include sensitive or financial information, such as personal credit card details, unless necessary. To read Nelson Brothers's privacy statement, please see <https://www.nelsonbrothers.com/privacy-policy/>

COMPETE ETHICALLY AND LAWFULLY

It is important for us to compete vigorously in the marketplace; however, we must also act with integrity and adhere to all applicable laws that promote competition and protect consumers.

These laws promote fair competition for the benefit of consumers and the market. They are known as 'competition' or 'anti-trust' regulations and are designed to stop companies colluding with competitors or from using their market power to reduce competition. When we buy products and services from our competitors, we must always comply with competition regulations.

Competitors can include anyone who has the ability or the capacity to compete with Nelson Brothers. This can include, but is not limited to, companies that compete with us for customer contracts and companies that compete with us for source material.

WHAT MUST YOU DO?

It is important to be aware of what we should and must not do when interacting with competitors and customers. Ensure any agreements or arrangements with competitors enhance competition.

DISCLOSE OR RESOLVE CONFLICTS OF INTEREST

Conflicts of interest are often difficult to avoid. A conflict of interest can exist if you have a personal interest in a decision being made, if that decision should be made free from bias and solely in the best interests of Nelson Brothers.

We recognize our people have financial interests, participate in activities outside of their work and relationships and networks with others. This includes close personal relationships you may have with other Nelson Brothers employees, contractors or suppliers, relevant personal financial interests, working with family members, or taking additional jobs, whether paid or unpaid.

Some examples that could create a conflict of interest for you are:

- Working with a family member or partner where you are able to make employment decisions that affect them, such as appointment, promotion, performance, pay or hours.
- A financial interest in a business that is competing to provide services to Nelson Brothers.
- A close personal relationship with someone who works for a supplier where you are responsible for making a decision about our commercial relationship.

WHAT MUST YOU DO?

Always avoid situations which could create an actual or perceived conflict between your interests and those of Nelson Brothers. If such a situation arises, you must put Nelson Brothers's interests before your own, be honest, transparent and disclose the situation to your manager, and seek directions on how to disclose, document, and manage the potential conflict.



BE CAUTIOUS WITH GIFTS AND HOSPITALITY

Hospitality, including entertainment, and the giving of gifts is part of developing business relationships with existing and prospective customers and other stakeholders. However, they must only be given or received without obligation, be reasonable in cost and consistent with our values.

WHAT MUST YOU DO?

Anything of value that is offered, given or received in connection with your work for Nelson Brothers must:

- Be for a legitimate business purpose.
- Be modest in value and nature.
- Be in good faith, occasional, appropriate, reasonable and comply with any applicable rules and regulations.
- In respect of government officials or state-controlled customers, comply with their rules and regulations.
- Never be in cash or cash equivalents such as vouchers or credit notes.
- Never be connected in any way to the obtaining of an inappropriate advantage or benefit.

WE ARE COMMITTED TO EXCELLENCE

WE TAKE ACCOUNTABILITY FOR OUR BUSINESS AND FOR DELIVERING OUTSTANDING RESULTS.

We deliver this by expecting our people to:

- Use assets and resources wisely and accurately.
- Protect our assets, equipment and property.
- Protect our information systems, networks and devices.

USE ASSETS AND RESOURCES WISELY AND MAINTAIN ACCURATE RECORDS

We must always ensure that we use Nelson Brothers assets and resources wisely. Financial delegations are important and apply to everyone. Cash and checks must be controlled to guard against loss and protect against fraud or other misuse. Processes to order and contract for products, services or supplies are designed to protect Nelson Brothers's interests, maximize commercial interests and minimize financial and legal exposure.

Complete, accurate and timely business records are vital to transparent communication of Nelson Brothers's business status. Business records may be subject to public disclosure and individuals can be subject to legal action for improper record keeping. We may terminate contracts of employment if we find misuse of our assets, theft or fraud, or deliberate inaccuracies in our records. We may also press for criminal prosecution and seek financial recovery through civil proceedings.

WHAT MUST YOU DO?

Follow all financial controls and processes that are designed to minimize risk and protect Nelson Brothers from fraud and loss. Ensure all business records – financial, human resources, payroll and environmental records – accurately reflect the underlying facts and figures. Use our assets or equipment only for legitimate purposes.

PROTECT OUR ASSETS, EQUIPMENT AND PROPERTY

Protecting our assets, equipment, and property means safeguarding them from theft or damage.

We adopt a total lifecycle approach to our assets to ensure they are operated and maintained in accordance with design requirements, operate safely and optimize the value generated by the asset. All controls securing our plant and equipment must be in place to prevent vandalism, sabotage or theft.



We also protect our intellectual property (including patents, copyright, trademarks and trade secrets) and closely monitor for unauthorized use of our intellectual property by others. Our Intellectual Property is proprietary; make sure you have a Non-Disclosure Agreement in place before you share any information that may be deemed a trade secret or otherwise eligible for patent protection. We take care to respect the intellectual property of others such as partners, customers and suppliers.

To the extent permitted by law, we reserve the right to monitor or audit use of our information systems and to access electronic communications or information stored on systems, devices or equipment for maintenance, business needs or to meet a legal or policy requirement.
