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Code of Conduct Policy

Introduction:

Business is subject to increasing legal responsibilities. It is incumbent on all employees to keep informed and understand your legal responsibilities. Depending on your role in the Company, it is important for you to understand your responsibilities under various Legislation such as Trade Practices, Chain of Responsibility, Taxation, Employment, Psychosocial Risks, Work Health & Safety and Environment laws etc. and Metromix policies relating to them. Where responsibilities and Metromix's obligations are not understood, Management guidance must be sought. Metromix will ensure there are constant updates provided of any changes to Law as this relates to employees responsibilities and education as required. Each business location must post this Code on WHS Notice Boards and these will also be uploaded onto the Metromix intranet site.

Metromix has a reputation for honesty and integrity. We will maintain this reputation by thinking carefully about our behaviour and by taking only that action that will reflect well on us.

Acting with Integrity:

We will conduct business openly and honestly in strict compliance with applicable laws, rules, and regulations so that we are accurately perceived to be an ethical organisation of dedicated and competent individuals.

Purpose:

Metromix strives to maintain a high standard of ethical business behaviour at all times. To help maintain this standard, we require our people and our contractors to conduct themselves in a professional, lawful, ethical and respectful manner.

The purpose of this Code of Conduct ('Code') is to articulate and make clear to everyone the standards of behaviour that Metromix expects of each of its people.

Scope:

This Code applies to all Metromix employees, Senior Leadership Team, contractors, labour hire employees, suppliers, apprentices and work experience students (collectively, 'Workplace Participants' or 'you').

Metromix requires our people and contractors to perform their duties or functions to the best of their abilities, impartially and diligently in order to contribute to the achievement of the Metromix goals. This Code aims to set out for all our people and contractors of Metromix the conduct required in the performance of their work, duties and functions and the consequences of not meeting these requirements.

This Code covers all circumstances when our people and contractors are performing work, duties or functions for Metromix such as work-related functions, travel, conferences and any circumstances when a person is representing Metromix. This Code is not a contract and is not incorporated into the terms of anyone's employment or contractor agreement.

Metromix expects Workplace Participants to be familiar with the Code. Metromix may at its discretion amend or replace it.



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Accountability

In the work environment, values and judgment must guide all of our decisions and behaviour. Be cautious when you hear yourself or someone else say, “no one will ever know”, or “everybody does it”. Think through the situation, seek guidance, and take the time necessary to reach the right result. Each of us is accountable for our decisions and actions.

All Metromix Managers are asked to complete a Code of Business Conduct questionnaire. If asked, you must respond promptly. This questionnaire verifies that you have read and agreed to the Directive, and have disclosed any potential violations or conflicts of interest.

If you have questions, ask for guidance or direction from your Manager, Supervisor or the Risk Manager.

Failure to comply with Metromix policies or these standards of conduct can have consequences for both the employee and Metromix. Metromix will impose appropriate disciplinary action for violations. Certain violations also violate the law and may be subject to Metromix or employees to legal liability.

Any breach of this Code could (for our employees) lead to disciplinary action up to and including summary termination of your employment (or if you are a contractor, the termination of your engagement). You should also be aware that if you breach any part of this Code, in some instances:

- ▶ a breach of this Code may also be a breach of the law and may have legal consequences for you;
- ▶ Metromix may be required by law to report your conduct to the authorities (for example, the police).

When Does the Code of Conduct Apply to You?

The obligations contained in this Code not only apply to you when you are working at Metromix premises, they also apply in circumstances where you are:

- ▶ working for Metromix outside of business hours;
- ▶ representing Metromix externally;
- ▶ attending an event (internal or external) including but not limited to events organised by Metromix such as a Metromix Christmas Party (regardless of whether or not such event is being held on a Metromix site); and
- ▶ engaging in any social media activity (whether within work hours or outside of it, and regardless of whether that social media activity is accessed via the Metromix network or externally) that can in any way be referenced back to or otherwise be connected with your engagement at Metromix.

What Behaviours Does Metromix Expect of You?

Metromix is guided by its Mission Statement which is set out below, and expects its employees to act in a manner that is consistent with those values:



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“Our company is our people”

Our mission is to provide value to our employees and contractors, our customers and our shareholders in the supply of quality concrete and quarry products. We will be proactive in safety, personal health and well-being and environmental management. We will have a positive impact on the wider communities in which we operate.”

For Metromix to be Considered a Success we Need to Focus on What is Important:

- ▶ A culture of “safety first” which delivers zero harm
- ▶ Happy and productive employees and contractors that are adaptable, able to grow and demonstrate a “can do” attitude
- ▶ Strong customer relationships where both parties benefit from working together
- ▶ Good community and regulatory relations where we are seen to add value in the communities in which we operate

In line with the Mission Statement and its values, Metromix expects its Workplace Participants to at all times:

- ▶ act ethically and honestly;
- ▶ be respectful and professional in all dealings with others;
- ▶ comply with all applicable laws, rules, regulations and standards of bodies that regulate the industries in which Metromix operates;
- ▶ not engage in fraudulent, unethical, corrupt or unlawful conduct;
- ▶ not discriminate unlawfully or engage in any behaviour that is harassing or bullying, or act in any way that puts the health or safety of any Workplace Participant at risk (please refer to the Respect in the Workplace Policy in conjunction with this Policy);
- ▶ behave in a manner that complies with current standards reasonably expected by the community;
- ▶ disclose to Metromix any and all conflicts of interest;
- ▶ for employees, comply with all Metromix's policies and procedures (as introduced or amended by Metromix from time to time).

This Code is a set of overarching principles to be followed rather than an exhaustive list of prescriptions. This Code cannot address all possible issues and scenarios which may be faced in the course of performing work, duties or functions for Metromix. Staff and contractors are required to:

- ▶ comply with this Code, and
- ▶ have regard to the policies, directives, procedures and guidelines issued by Metromix and as amended or replaced from time to time which may set out more detail on particular matters referred to in this Code. Creating a professional and ethical environment relies upon employees and contractors having responsibility for their own conduct, taking into consideration the principles set out in this Code, the policies, directives, procedures and guidelines of Metromix.



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If there is any doubt about the application of the Code, or the appropriate course of action to be adopted in a particular scenario, then you are expected to discuss the matter with the employee's Manager and/or supervisor or the Risk Manager.

Personal and Professional Behaviour

The behaviour of our people should contribute to the development of a productive and harmonious workplace and should reflect favourably on our staff, their profession and Metromix. Metromix staff and contractors are required to:

- a) comply with all legal, industrial and administrative requirements, and lawful and reasonable directions given by or on behalf of Metromix
- b) perform to the best of their abilities and knowledge their work, duties and functions for Metromix, including maintaining and developing knowledge in their professional fields and areas of responsibility,
- c) act in the best interests of Metromix and in accordance with Metromix Mission Statement,
- d) be aware of the requirements of applicable legislation, such as Anti-Discrimination and Work Health and Safety legislation and the responsibilities these place on them,
- e) make decisions reasonably and without bias using the factual information available,
- f) maintain timely, adequate and appropriate documentation to support decisions made,
- g) show respect for the public treating them honestly and with appropriate courtesy,
- h) be familiar with, implement and comply with all Metromix policies, directives, procedures and guidelines,
- i) act responsibly when becoming aware of any unethical behaviour or wrong doing by any employee or contractor,
- j) treat others in the workplace fairly and with respect, including not engaging in bullying conduct,
- k) not harass, victimise or discriminate against employees and/or contractors or others in the workplace on the grounds of sex (including pregnancy), sexuality, transgender status, race, colour, ethnic or ethno-religious background, descent or national identity, marital status, disability, age, political conviction or religious belief, carers' responsibilities or other grounds covered by relevant legislation.

Complying with WHSE Policies

Workplace Participants must comply with all Metromix policies, procedures and guidelines relating to the management of Health Safety and the Environment ('WHSE').

In performing your duties you must:

- ▶ not do anything that puts at risk your health or safety or that of others, and must take reasonable care to ensure your own health and safety and the health and safety of others at Metromix workplaces;
- ▶ take reasonable care to protect the environment in the course of business undertakings and take all reasonable measures to control any potential adverse impact on the environment; and



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- ▶ report any HSE incident immediately upon becoming aware of the incident and no later than 24 hours after the incident. Serious incidents must be reported immediately and without delay as Metromix may have a duty to notify emergency services or a safety or environment Regulator.

Drug and Alcohol Usage

It is important that all Workplace Participants refrain from the use of illegal drugs and the excessive consumption of alcohol in the workplace and at work-related events – refer to [Drug and Alcohol Policy](#).

a) Responsible Consumption of Alcohol:

You must not consume alcohol while performing work-related duties or while providing services to Metromix. If alcohol is served:

- ▶ at an event or function, organised by Metromix, whether or not held at a Metromix workplace; or
- ▶ at a work-related function that is not organised by Metromix, whether or not held at a Metromix workplace or off-site,

then you are expected to adopt a responsible attitude to the consumption of alcohol and must take responsibility to ensure that you consume alcohol in a responsible and low-risk manner.

You must also comply with any restrictions or bans on alcohol which may, from time to time, apply at your particular place of work.

b) Drug Use

You are prohibited from bringing into any Metromix workplace, and from using or providing to another person, any illegal substances. If you use, possess or provide illegal substances at any Metromix workplace you will be considered to have engaged in serious misconduct and will be subject to disciplinary action up to and including immediate dismissal.

If you misuse prescription medication you may also be considered to have engaged in misconduct if such misuse adversely affects your behaviour or work performance, places the health or safety of yourself or another person at risk, or adversely affects Metromix interests or reputation.

You must notify your manager immediately if you are aware that you or another person's work performance or conduct could be adversely affected as a result of the effect of alcohol, or prescribed or illegal drugs.

Fraud, Bribery and Corruption

Workplace Participants must not engage in any unethical, fraudulent or corrupt conduct.

Please refer to the Metromix [Fraud, Bribery and Corruption Policy](#) for further details of the types of conduct which are prohibited.

Gifts and Entertainment

You must not receive, solicit or give any form of gift, benefit or entertainment from or to any person doing business with Metromix if the gift, benefit or entertainment could reasonably be regarded or perceived as influencing the recipient (where the recipient is in a position to influence an outcome) or creating business obligations on the part of the recipient.



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Please refer to the Metromix Fraud, Bribery and Corruption Policy for further guidance, a copy of which is available at Metromix intranet.

Conflicts of Interest

You must avoid any actual or potential conflicts of interest which may arise in your work with Metromix. If a potential conflict of interest cannot be avoided then it must be managed.

Where you become aware of any actual or potential conflict of interest you must disclose this to Metromix.

Financial Interests

An example of a financial conflict of interest which may arise is where an employee who has a financial interest in an external entity (e.g. company, sole trader, government authority, etc.) is in a position to influence contracts between that entity and Metromix.

Personal Interests

Employees are expected not to use or manipulate their position in order to gain personal benefit.

Personal and Family Relationships between Employees

Metromix appreciates that situations may arise where employees are working with family members or with persons with whom they have a close, or hostile, relationship. Where such relationships exist between current or prospective employees, there is potential for a conflict of interest to arise. An example of where this could be the case is when an employee is:

- ▶ involved in a decision relating to the selection, appointment or promotion of another employee with whom he or she has such a relationship, or
- ▶ the supervisor of another employee with whom they have such a relationship and who is responsible for employment related decisions.

Fair Dealing

Where applicable, you must deal fairly with competitors, suppliers and fellow Workplace Participants.

You must not take unfair advantage of any party dealing with Metromix including where such advantages are obtained through illegal conduct, manipulation, undue influence, concealment, abuse of privileged or confidential information, misrepresentation of material facts, bullying and harassment, or any other unfair dealing practice.

Integrity in Financial Reporting

Full, accurate, timely and understandable disclosures in Metromix's reports to the Australian Securities and Investments Commission and other regulators is legally required and essential to the success of the business.

We will exercise the highest standard of care in preparing such reports.

The Company's accounting records must be maintained in accordance with all applicable laws, must be properly supported and classified, and must not contain any false or misleading entries.



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No information may be concealed from internal audit teams or external auditors. No director, officer or employee may take any action to influence, coerce, manipulate or mislead the Company's public auditors for the purpose of rendering the financial statements misleading.

Respecting the Value and Confidentiality of Information

Metromix's confidential information may not be used or disclosed for personal benefit, to damage Metromix or in a manner that violates laws and regulations. Metromix confidential information must only be used in the proper conduct of our jobs. All confidential Company information and trade secrets are the property of the Company and must not be used after you leave the Company (and, if possible, must be returned).

Protection and Proper Use of Metromix Assets

You must use your reasonable endeavours to protect Metromix assets. This includes our physical assets, proprietary information such as intellectual property, business and marketing plans, employee information, and any other information concerning Metromix that is not generally known to the public.

Such assets must also only be used for legitimate business purposes and in the best interests of Metromix.

Proper use of Company and customer data, property, facilities, and equipment is your responsibility. We must use and maintain these assets with the utmost care and respect, guarding against unauthorised access, waste and abuse.

Managers are responsible for maintaining business controls designed to prevent, detect, and correct process problems. Such must be in place to establish the foundation for the achievement of business objectives and compliance with laws, regulations and Company policies.

Employees must be cost-conscious and alert to opportunities for improving performance, while reducing costs.

The use of Company time, material, or facilities for purposes not directly related to Company business, or the removal or borrowing of Company property without permission, is prohibited. Incidental personal use is permitted for computers, phones, faxes, copiers, internet access and the like.

Proper Use of Metromix IT Systems

All Workplace Participants must operate Metromix information technology networks, systems and devices ('IT Systems') in accordance with our relevant policies and procedures.

All of our employees are issued with a unique User ID. You will be held accountable for any operation performed using your user ID including any transaction, message, access, retrieval or authorisation executed on a Metromix system or device. Therefore, you must ensure that your usage of IT Systems is appropriate and reasonable.

When using Metromix IT Systems, you:

- ▶ must not access, download, save, store, transmit or distribute illegal or inappropriate content including material which is sexually explicit, violent, obscene, offensive, harassing, discriminatory or disparaging of others;



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- ▶ must not access download, save, store or transmit material to breach or facilitate the breach of anyone's intellectual property;
- ▶ must not use the IT Systems to engage in any commercial activity not related to the business of Metromix;
- ▶ must not create, store or disseminate destructive computer programs such as viruses or self-replicating codes or download unauthorised computer programs;
- ▶ are responsible for maintaining the security of your user ID and access passwords and must take care not to share these with anyone else; and
- ▶ may engage in a reasonable level of personal usage of the internet and email, however, such use must not negatively interfere with performance of your work.

You should be aware that Metromix undertakes surveillance of all aspects of its IT Systems, including phone, internet and email usage, on an ongoing and continuous basis. Metromix may keep a back-up of its systems (including emails) and may access such records from time to time (including for the purposes of investigating any misconduct). Metromix may also block access to particular internet sites or emails for time to time, for example, if it suspected that they contain inappropriate material, a suspected virus or spam or other risk.

Speaking on Behalf of Metromix

You must not speak on behalf of Metromix to any media outlets or representatives, or any other third party. Only the Metromix General Manager, or member of the Senior Leadership Team, or their approved delegates are authorised to speak or make comments on behalf of Metromix.

If you are approached by an external party for comment please report this to the Metromix Senior Leadership Team.

Social Media

Social media has become an important way that individuals and businesses communicate and promote themselves.

When we refer to 'social media' in this Code, we mean any social networks, platforms, video or photo sharing sites, chat rooms, online discussion groups or forums, wikis, blogs, blogging tools, and internet sites that facilitate the publishing of user-generated content. These include, but are not limited to, platforms and networks such as Facebook, Tumblr, Twitter, Instagram and YouTube.

a) Business Use of Social Media

You may only create a Metromix business-related social media account by first obtaining the approval from the IT Manager.

All content posted to any Metromix related social media account (including any content that is retweeted or shared from another account) must be approved before it is published and must not:

- ▶ breach any copyright, discrimination, defamation, privacy, financial disclosure or other applicable laws;



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- ▶ provide any opinion or advice (including financial advice) to any third party, unless prior approval has been sought from the General Manager; and
- ▶ adversely impact on the Metromix brand or reputation.

b) Personal Use of Social Media

You may access your own social media accounts during work hours, however your use of social media must not be excessive and must not negatively impact on the performance of your work.

You should use common sense when accessing and using your own social media accounts and must not publish any content on any social media account or platform which:

- ▶ is confidential or private information of Metromix or any other Workplace Participant;
- ▶ disparages Metromix or any other Workplace Participant;
- ▶ could be considered bullying or harassment (including sexual harassment); or
- ▶ adversely impacts the Metromix brand or reputation.

You should remember that these obligations apply to your use of any social media account or platform (whether accessed via Metromix's IT Systems or otherwise), even accounts or platforms where you are not identifiable as a Metromix employee, or your name isn't identified.

Failure to Comply with Code:

Metromix may take action against any employee if they breach this Code. Any such action may result in the imposition of sanctions, up to and including, termination of employment, appointment or engagement. For employees such action may include disciplinary action for 'misconduct' or 'serious misconduct' under any applicable Metromix Enterprise Agreements or Contract of Employment or other form of engagement. In some circumstances, breaches of the Code may also result in Metromix notifying a relevant statutory authority and/or agency, and action being taken by a statutory authority and/or agency where breaches of relevant legislation may be evident. This may result in criminal action, fines or imprisonment.

Responsibilities of Employees

All employees are required to comply with the Code and other documents referred to in it.

Responsibilities of Supervisors, Managers and Members of the Senior Leadership Team

Supervisors, Managers and Senior Leadership Team should, where possible:

- ▶ model in their own conduct on the requirements of the Code,
- ▶ create an environment where the requirements of the Code are reflected in the day-to-day management of employees,
- ▶ encourage Supervisors, Managers and Senior Leadership Team maintain high standards of conduct in the workplace.



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HOW DO I REPORT A BREACH OF THIS CODE OF CONDUCT?

If you are aware of an actual or suspected breach of the Code of Conduct, you can report this by taking the steps referred to in Metromix Grievance Resolution Procedure, a copy of which is available on the Metromix intranet.

Metromix calls on every employee to report any violation or apparent violation of the Code. If appropriate, you are encouraged to work with your supervisor or higher level of management in making a report, which should then go to the General Manager/Risk Manager. You may also report a violation directly to the General Manager.

The General Manager/Risk Manager is responsible for maintaining and updating the Code of Conduct. The General Manager works together with senior management to investigate matters and recommend corrective action.

Reports will be handled confidentially. No employee will suffer indignity or retaliation because of a report he or she makes in good faith. You may make an anonymous report.

GLENN SIMPKIN
GENERAL MANAGER

24th April 2023