

Darton Group Ltd and its group companies (the “Group”)

Code of Conduct

Ethics & Compliance

Since commencing the business in 2000 we have acted in the belief that doing the right thing sets the foundation for long term success. Our customers, shareholders, employees and communities count on us to uphold this commitment and we know that the Group’s continued success depends on it.

This Code of Conduct outlines the Group’s ethical and compliance standards for conducting business throughout the world and serves as a guide for employees when they face dilemmas where the right choice is not clear.

Our Guiding Principles

We obey the law. Obeying the law is the foundation on which our reputation and Guiding Principles are built. The Group is privileged to do business all over the world, we have the responsibility to comply with all of the laws that apply to our businesses.

We conduct our business with integrity. We take pride in conducting our business with integrity. We compete vigorously but do so fairly and ethically. We do not offer or accept bribes or inappropriate gifts and we comply with the laws and regulations that support fair competition and integrity in the marketplace.

We believe in responsible supply chains. Supply chains must respect people, human rights, promote good practices, provide viable livelihoods, and reduce environmental impacts. The Group does not accept or support the use of illegal, abusive, enforced or child labour.

We keep accurate and honest records. Accurate and honest records are critical to making sound business decisions and maintaining the integrity of our financial reporting. Our business information, in whatever form, must reflect the true nature of our transactions.

We honour our business obligations. Our business relationships are grounded in mutual trust and have been throughout our history. We build and maintain the trust and confidence of our customers and other business partners by communicating honestly, respecting information entrusted to us and standing behind our commitments.

We treat people with dignity and respect. We achieve our goals through our people. We provide a safe workplace and value the unique contributions of our team, enabling those who support the Group’s goals to achieve their own individual potential.

We protect the Group’s information, assets and interests. We count on one another to act as stewards of the organization. To preserve the value of the Group we protect the information and assets entrusted to us and avoid situations that may let personal interests influence our business judgment.

We are committed to being a responsible global citizen. With our global reach comes the responsibility to understand and manage our impact. We maintain strict environmental and safety

standards and share our global knowledge and experience to help meet economic and social challenges.

This Code of Conduct has been approved by the Directors of Darton Group Ltd.

Roy Walton
Director
28 February 2022