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CO-PL-002 Code of Business Conduct & Ethics

Definitions

The Code – Safescape’s Code of Business Conduct and Ethics

The Company – Bortana Pty Ltd trading as Safescape

Team Members – Directors, Officers, Employees and any third-party associates representing Safescape (ie: Subcontractors)

Authorised Spokesperson – Provided with authorisation in writing by the Managing Director or General Manager to represent Safescape on behalf of the Company.

Introduction

Since its founding, Safescape has been governed by values of integrity, honesty, and full compliance with applicable laws. This Code of Business Conduct and Ethics outlines certain non-negotiable minimum standards of behaviour in key areas to ensure all business undertakings are in line with Safescape’s corporate values. The purpose of the Code is to provide guidance to all our colleagues, partners and associates on the conduct of our business according to the highest ethical standards. By adhering to the Code, we uphold our corporate values.

The nature of this Code is not meant to cover all possible situations that may occur. It is designed to provide a frame of reference against which to measure any activities. It applies to everyone involved in business with Safescape including employees, associates, directors, officers of Safescape and others who perform services for the Company across the world (“business partners”).

Business Partners

Safescape expect the same level of conduct and ethics standards from our Business Partners. As the Company can be legally responsible for the conduct of a business partner when it occurs in the course of their work for the Company, we believe in doing business with business partners who demonstrate high standards of ethical business conduct.

It is expected that Safescape agents, vendors, suppliers, independent contractors, consultants or joint venture partners, or any other third party acting on behalf of the Company will perform legitimate services and adhere to the standards of ethical and professional conduct as described in this Code.

The selection of Company business partners will be made on the basis of objective criteria, including quality, technical excellence, cost/price, schedule/delivery, services and commitment to socially responsible and ethical business practices. No business partner will be asked to perform services for our Company without proper due diligence and without an agreement detailing the services and payment terms.

Localisation

Safescape recognise the importance of supporting local communities, regions, and countries through implementing localisation procedures for hiring and procurement wherever possible. As the Safescape safety product range is unique and requires specific expertise to install, it is difficult for Safescape to hire or purchase products local to projects around the globe. However, Safescape embrace the opportunity to train the local employees of client sites to undertake Laddertube Installs and develop the local skill base in this area.

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Compliance with Laws, Rules and Regulations

Safescape requires that all Team Members comply with all laws, rules and regulations applicable to the Company wherever it does business. Everyone is expected to use good judgement and common sense in seeking to comply with applicable laws, rules and regulations and to ask for advice when they are uncertain about them.

If anyone becomes aware of a potential violation of any law, rule or regulation by the Company, whether by its officers, employees, directors or any third party doing business with the Company, it is the individual's responsibility to promptly report the matter to their supervisor or the General Manager.

Conflicts of Interest

Team Members must act in the best interests of the Company. They must refrain from engaging in any activity or having a personal interest that presents a "conflict of interest". A conflict of interest occurs when an individual's personal interest interferes, or appears to interfere, with the interests of the Company. A conflict of interest can arise whenever a Team Member may act or have an interest that might prevent them from performing their Company duties and responsibilities honestly, objectively and effectively.

Team Members must not:

- Perform services as a consultant, employee, officer, director, advisor or in any other capacity for a direct competitor of the Company, other than services performed at the request of the Company.
- Have a material interest in a direct competitor of the Company
- Use his or her position with the Company to influence a transaction with a supplier or customer in which such person or a close relative of such person has a material interest
- Supervise, review or influence the job evaluation or compensation of a member of his or her immediate family.

A "material interest" includes a financial interest representing more than one percent (1%) of the outstanding shares of a publicly-held company or any other position that would allow an individual to influence the business decisions made by a corporate entity.

A "close relative" means a parent, parent-in-law, spouse, sibling, child, son-in-law, daughter-in-law, or any person living in the same home with the Team Member.

It is the individual's responsibility to disclose any transaction or relationship that reasonably could be expected to give rise to a conflict of interest to the General Manager, who shall be responsible for determining whether such transaction or relationship constitutes a conflict of interest.

Insider Trading

Team Members who have material non-public information about any company, including Safescape's suppliers and customers, as a result of their relationship with the Company are prohibited by law and Company policy from trading in securities of such companies, as well as from communicating such information to others who might trade on the basis of that information.

If anyone is uncertain about the constraints on their purchase or sale of the securities of any company that they are familiar with by virtue of their relationship with Safescape, they should consult with the General Manager before making any such purchase or sale.

Confidentiality

Team Members must maintain the confidentiality of confidential information entrusted to them by the Company or other companies, including suppliers and customers, except when disclosure is expressly authorized by a supervisor or legally mandated. Unauthorized disclosure of any confidential information is prohibited. Additionally, Team Members must take appropriate precautions to ensure that confidential or sensitive business information, whether it is proprietary to the Company or another company, is communicated within the Company only to employees who have a need to know such information to perform their responsibilities for the Company.

Third parties may ask for information concerning the Company. Subject to the exceptions noted in the preceding paragraph, Team Members (other than the Company's Authorized Spokespersons) must not discuss confidential Company matters with, or disseminate confidential Company information to, anyone outside the Company, except as required in the performance of their Company duties and after an appropriate confidentiality agreement is in place. This prohibition applies to all inquiries directed to the Company from the media and any other outside source. All responses to inquiries on behalf of the Company must be made only by the Company's Authorized Spokespersons.

If any Team Members receive inquiries directed to the Company, they must decline to comment and refer the inquirer to the General Manager or one of the Company's Authorized Spokespersons.

Fair Practices

Safescape respect all people and have a reputation of trust and integrity through all relationships. Therefore, the Company will not disclose to a third party any contractual information nor the terms of our business relationships with our subcontractors and vendors, unless provided with written permission to do so.

Honest, Ethical Conduct and Fair Dealing

Team Members should deal honestly, ethically and fairly with the Company's suppliers, customers, competitors and employees. Statements regarding the Company's products and services must not be untrue, misleading, deceptive or fraudulent. Team Members must not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair-dealing practice.

Protection and Proper Use of Corporate Assets

Team Members should seek to protect the Company's assets. Theft, carelessness and waste have a direct impact on the Company's financial performance. Team Members must use the Company's assets and services solely for legitimate business purposes of the Company and not for any personal benefit or the benefit of any third party.

Gifts and Gratuities

The use of Company funds or assets for gifts, gratuities or other favours to government employees or officials is prohibited, except to the extent such gifts are in compliance with applicable law, insignificant in amount and not given in consideration or expectation of any action by the recipient.

Team Members must not accept or permit any member of his or her immediate family to accept, any gifts, gratuities or other favours from any customer, supplier or other person doing or seeking to do

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business with the Company, other than items of insignificant value. Any gifts that are not of insignificant value should be returned immediately and reported to the General Manager. If immediate return is not practical, they should be given to the Company for charitable disposition or such other disposition as the Company believes appropriate in its sole discretion.

Common sense and moderation should prevail in business entertainment engaged in on behalf of the Company. Team Members should provide, or accept, business entertainment to or from anyone doing business with the Company only if the entertainment is infrequent, modest and intended to serve legitimate business goals.

Bribes and kickbacks are criminal acts, strictly prohibited by law. Team Members must not offer, give, solicit or receive any form of bribe or kickback anywhere in the world.

Bribery and Corruption

Bribery and corruption perpetuate poverty, undermine economic development and distort competition. Safescape is committed to a strong work ethic and strictly prohibits its employees, service providers and agents from engaging in bribery and corruption as well as any conduct which could give rise to the appearance or suspicion of such illicit activities. Bribery is defined as an offer or receipt of any gift, loan, fee, reward or other advantage to or from any person as an inducement to do something which is dishonest, illegal or a breach of trust in the conduct of the Company's business.

Facilitation payments

Safescape Team Members must never pay or use third parties to pay an unofficial gratuity to government officials or employees in order to secure or expedite routine administrative actions such as customs clearances, visas, permits or licences.

Human Rights & Modern Slavery

Safescape recognise the basic rights that form the foundation for freedom, justice, and peace. The Company ensures that all business operations seek to prevent or mitigate adverse human rights impacts directly related to their operations, products, or services and through their business relationships.

Modern Slavery, Forced Labour and Child Labour are identified as serious human rights violations. As a result, Safescape ensure that employment is freely chosen with no allowance for forced or bonded labour and that all persons employed by the business, contractors and subcontractors are over the minimum legal working age in all countries they work in.

In addition, Safescape carefully comply with all applicable industrial relations legislation to ensure that working hours, remuneration and all other conditions of employment are met.

Accuracy of Books and Records and Public Reports

Team Members must honestly and accurately report all business transactions. Individuals are responsible for the accuracy of their records and reports. Accurate information is essential to the Company's ability to meet legal and regulatory obligations.

All Company books, records and accounts shall be maintained in accordance with all applicable regulations and standards and accurately reflect the true nature of the transactions they record. The financial statements of the Company shall conform to generally accepted accounting rules and the

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Company's accounting policies. No undisclosed or unrecorded account or fund shall be established for any purpose. No false or misleading entries shall be made in the Company's books or records for any reason, and no disbursement of corporate funds or other corporate property shall be made without adequate supporting documentation.

Waivers of this Code of Business Conduct and Ethics

While some of the policies contained in this Code must be strictly adhered to and no exceptions can be allowed, in other cases exceptions may be appropriate. Any Team Member who believes that an exception to any of these policies is appropriate in his or her case should first contact his or her immediate supervisor. If the supervisor agrees that an exception is appropriate, the approval of the General Manager must be obtained. The General Manager will maintain a complete record of all requests for exceptions to any of these policies and the disposition of such requests.

Reporting and Compliance Procedures

Every Team Member has the responsibility to ask questions, seek guidance, report suspected violations and express concerns regarding compliance with this Code. Any Team Member who knows or believes that any other employee or representative of the Company has engaged or is engaging in Company-related conduct that violates applicable law or this Code should report such information to his or her supervisor or to the General Manager. Team Members may report such conduct openly without fear of retaliation. The Company will not discipline, discriminate against or retaliate against any employee who reports such conduct or who cooperates in any investigation or inquiry regarding such conduct, unless it is determined that the report was made in bad faith or with knowledge that it was false. Any supervisor who receives a report of a violation of this Code must immediately inform the General Manager.

Violations of this Code may be reported on a confidential basis, by contacting the Company's General Manager by mail or e-mail at:

163 Allingham Street, GOLDEN SQUARE, VICTORIA, AUSTRALIA 3550

administration@safescape.com

If the General Manager receives information regarding an alleged violation of this Code, he or she shall, in consultation with the Managing Director:

- (a) evaluate such information,
- (b) determine whether it is necessary to conduct an informal inquiry or a formal investigation and, if so, initiate such inquiry or investigation, and
- (c) accurately record the results of any such inquiry or investigation, together with a recommendation as to disposition of the matter.

All Team Members are expected to cooperate fully with any inquiry or investigation by the Company regarding an alleged violation of this Code. Failure to cooperate with any such inquiry or investigation may result in disciplinary action, up to and including discharge. The Company shall determine whether violations of this Code have occurred and, if so, shall determine the disciplinary measures to be taken against any Team Member who has violated this Code.

Dissemination and Amendment

This Code shall be distributed to each new employee, officer and associate of the Company upon commencement of his or her employment or other relationship with the Company, and each employee,

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officer and associate shall certify that he or she has received, read and understood the Code. Additionally, the Code shall also be made available to all employees, officers, and associates on the Company's intranet site and on its electronic Noticeboard. The Company reserves the right to amend, alter or terminate this Code at any time for any reason. This document is not an employment contract between the Company and any of its employees, officers, or associates.