

Profluid Pty Ltd has a Code of Conduct which explains how we:

- **Do business**
- **Work together**
- **Engage with our community and other stakeholders**

Our business has been built upon the values of honesty, integrity and quality relationships with our associates, customers, suppliers, vendors, shareholders, and our community.

Relationships require a strong foundation of mutual trust and understanding that is nurtured day after day. That trust is earned, not just by following the letter of the law, but also by striving to "DO THE RIGHT THING".

Our Code of Conduct is based on these values and contains the fundamental principles of how we expect to conduct business. It makes clear that all associates are expected to understand and appreciate the ethical considerations of their decisions and reaffirms our long-standing commitment to a culture of corporate and individual accountability and responsibility.

From a business perspective, DOING THE RIGHT THING means following our company policies and procedures, speaking up, getting advice, and complying with the law.

This Code of Conduct Policy has been formulated to foster and maintain Employee trust and confidence in the professionalism and the integrity of the Employees of the company; therefore, maintaining and enhancing the reputation of the company. The circumstances of conduct, as set out below, are intended situations which attempt to threaten the conduct and workplace environment of Profluid Pty Ltd. For situations not specifically included in this Code, or in our policies and procedures, we still expect that Profluid Pty Ltd will always act appropriately.

Clauses covered under this policy:

a) Professionalism

The personal and professional behavior of Employees shall confirm to the standards expected of persons in their positions, which includes:

- a. A commitment to and adherence to professional standards in their work and in their interactions with other Employees of the Company.
- b. A commitment to maintaining the highest standards of integrity and honesty in their work.
- c. An adherence to ethical and legal standards to be maintained in business.
- d. A responsibility to support the Company in its efforts to create an open and mutually supportive environment.

Wherever a misunderstanding is thought to have taken place through unclear communications, this should be corrected promptly.

b) Conflict of Interest

Each Employee is expected to avoid situations in which his or her financial or other personal interests or dealings are, or may be, in conflict with the interests of the Company. Accordingly, the Company always expects its Employees to act in the Company's interest.

Employees must not use any Company's property, information or position, or opportunities arising from Code of Conduct for personal gains or to tarnish the image of the Company. All employees must avoid situations in which their personal interest could conflict with the interest of the Company.

c) Confidentiality of Information

As a result of employment with the Company, Employees may be entrusted with confidential information regarding the Company and/or its affiliates, its customers and suppliers. Upon joining, Employees are required to separately read, acknowledge, and sign the 'Confidentiality Agreement', included in the Employees working contract, that shall explicitly mention the terms and conditions of the confidentiality obligation and treatment of confidential information and intellectual property of Profluid Pty Ltd.

d) Bribery, Corruptive Acts

Profluid Pty Ltd complies with Laws and Regulations for its employees to always act according to ethical standards of honesty, integrity, fairness, and respect in all the transaction. Thereby, all intentional acts that may conceal or obscure the true nature of a business transaction are completely restricted.

By this, employees in Profluid Pty Ltd must

- Not give, offer, accept, or request bribes, facilitation payments, secret commissions, or other prohibited payments.
- Not use the company name and/or ABN and company address for personal shipments.
- Engage in money laundering or cause any of them to be given, offered, accepted, or requested.
- Not approve any offers, or make, accept, or request any irregular payments or other thing of value, to win business or influence a business decision in favor of Profluid Pty Ltd.
- Comply with any reporting and approval processes for gifts, entertainment, or hospitality.
- Obtain required approvals for donations and sponsorship.
- Not offer or receive any gifts, entertainment, or hospitality to or from public or government officials or politicians, without approval from the relevant Anti-bribery Officer.
- Be vigilant and report any breaches of, or suspicious behavior related to, this policy.

A breach of the Policy may result in disciplinary action against the Employee concerned including, potential dismissal or termination of employment or any other legal action available with the Company.

All business stakeholders should come forward if they have any concerns regarding any breach of this Policy and should do so without any fear of reprisal or repercussion.

Our Policy will be made available to any interested party via our website at: <https://profluid.com.au/>



CODE OF CONDUCT POLICY

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Jerome Monteiro
Managing Director