

Code of Conduct

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1. About the Code

The purpose of the Code of Conduct is to set standards of conduct expected of Brickworks employees.

Brickworks employees should be respectful, professional and act with honesty and integrity to maintain high ethical standards and uphold Brickworks reputation.

High standards of conduct will serve to enhance Brickworks reputation for fair and responsible trading and encourage appropriate behaviour across the business.

This Code applies to all directors, officers and employees of Brickworks Limited and its controlled entities.

This Code outlines a range of business ethics and standards of conduct. This Code does not summarise all Brickworks policies and guidelines or laws that apply to our business. Employees must exercise good judgement and common sense in line with this Code.

Employees should also refer to Brickworks policies and guidelines in place from time to time for further detail or seek clarification when they are unsure about the appropriate course of action to take.

2. Core Values

The Code of Conduct is based on the Brickworks values. The Brickworks core values underpin the way in which we act and behave at Brickworks. They describe what's important to us, and guides our interactions with each other, our customers, suppliers, contractors and the community.

The Brickworks core values are:

- Care: Sustainably Safe
- Collaborate: Succeed Together
- Exceed: Passionately Play to Win
- Integrity: I Do What I Say
- Innovate: Everyone, Everywhere, Everyday
- Lead: Inspire People

The following sections outline a number of fundamental standards to inform and explain expectations of Brickworks employees towards its people, third parties, governments, the community and investors.

3. Our People

3.1. Promoting a safe, healthy and sustainable workplace

At Brickworks we care about keeping people safe and healthy. Brickworks is committed to providing healthy and safe workplaces for all employees, contractors and visitors working within, or visiting, Brickworks premises.

Everyone shares the responsibility for making health and safety a daily priority, with there being no task we undertake that is so important we can't take the time to find a way of doing it safely. Every employee is accountable for complying with the health and safety requirements that apply to their job and for taking precautions necessary to protect themselves, their co-workers and visitors.

All employees are required to present to work free from the influence of alcohol, drugs or any other substance that may impact them from performing their jobs properly or that could create a dangerous situation.

Acts of violence, threats, physical intimidation, bullying and harassment have no place at Brickworks and can result in immediate disciplinary action, up to and including termination of employment.

Brickworks employees are required to be familiar with and comply with all Brickworks Health & Safety Policies.

3.2. Diversity and inclusion

Brickworks is committed to an inclusive culture where all employees are treated with dignity and respect, valued for their contributions and diverse backgrounds, experiences and perspectives.

Applicants for employment are evaluated by the Company on merit in accordance with their skills, qualifications and abilities and having regard to the Company's operational needs.

Brickworks seeks to provide a workplace where every employee is treated with respect and which is free from harassment, discrimination and bullying.

Brickworks employees are required to be familiar with and comply with the Brickworks Equal Employment Opportunity (**EEO**) Policy - F1.

3.3. Responsibly engaging in social media

Social media has enabled people to communicate and share thoughts, opinions and interests within social and professional networks. When using social media, all employees must:

- act responsibly and lawfully towards the Company, your co-workers and customers;
- ensure time spent with social media does not interfere with work commitments;
- never disclose confidential or sensitive information of Brickworks; and
- not make maliciously false or defamatory statements or any other statements that may violate the law Company policies, the reputation of our products or services.

Unless authorised to do so, employees must not post on social media as a representative of Brickworks.

3.4. Privacy

You must protect and safeguard the privacy of personal information held by the Company regarding its customers, suppliers, employees and others.

3.5. Compliance with Laws

Brickworks is committed to complying with relevant laws and regulations. All actual or potential breaches must be reported to your General Manager or the Company Secretary.

4. Third Party Relationships

4.1. Conflict of interest

You must act in the best interests of the Company.

Brickworks is committed to ensuring that actual, potential and perceived conflicts of interest are identified and avoided, or in situations where they cannot be avoided they are appropriately managed.

Conflict of Interest arises where an employee has a personal, financial or other interest that conflicts or has the potential to conflict with Brickworks interests and their ability to make impartial business decisions.

All employees must notify their business unit General Manager or the Board (if you are a director) as soon as possible of any circumstance which may lead to a conflict of interest, or results in a conflict of interest.

Depending on the nature of the actual or potential conflict of interest action will be determined on a case by case basis. A serious conflict of interest which cannot be satisfactorily resolved may result in termination of employment.

Common examples of perceived conflicts of interest include:

(a) Close personal relationships

Any business transaction with a person having a close personal relationship with an employee may generate a conflict of interest for that employee. A close personal relationship generally refers to a

spouse or partner, dependants and any person living in the same dwelling, but employees should also consider whether transactions with other relatives, friends and companies controlled by those persons give rise to a conflict of interest and act accordingly. Conflicts may also arise where an employee has a close personal relationship with another employee with direct reporting lines or conflicts in roles and responsibilities.

(b) Outside employment and other activities

Any employee holding positions or investments (directly or indirectly) in organisations that have business dealings with Brickworks (including competitors, customers, suppliers or your own family business) may generate a conflict of interest especially if that employee is in a position to influence the outcome of transactions with Brickworks.

4.2. Anti-bribery, gifts, entertainment or other benefits

A number of countries, including Australia, have strict laws against bribery and corruption. The anti-bribery laws of some countries including Australia can apply to things done in other countries (i.e. wide reaching territorial effect). We must comply with and uphold all laws against bribery, corruption and related conduct applying to the jurisdictions where the Company operates. Accordingly, the company has a strict policy not to offer secret commissions or bribes to further its business interests. Depending on the circumstances facilitation payments such as customary, unofficial minor payments to speed up a routine government action may breach anti-bribery laws.

Care must be taken when accepting hospitality, entertainment or gifts, above that required for the normal conduct of business or which may compromise your impartiality.

This obligation does not prevent employees from attending social or sporting functions with approval from their manager or accepting gifts of a minor nature (less than AUS\$220 (for Australian employees) and less than US\$150 (for US employees)).

As a general rule employees should reject offers of sponsored travel and accommodation.

You may seek further clarification from your Manager, the Company Secretary, the Managing Director or the Board (if you are a director).

4.3. Promoting fair competition

Brickworks is committed to promoting fair competition and dealing fairly with customers, suppliers, competitors and other third parties.

Brickworks success in the marketplace results from providing superior products and services at competitive prices. Brickworks does not seek to gain advantage through improper or anti-competitive practices.

Employees must never engage in anti-competitive practices or behaviours including any agreements, decisions and collaborative practices with competitors that restrict competition such as price fixing, bid rigging or boycotts.

Employees must take care when participating in industry associations. Consideration should be given to all aspects of activities of an association (including membership criteria, rules of membership and standards) to ensure that this does not breach competition law.

4.4. Responsibility to shareholders and the financial community

The Company is committed to providing value to its shareholders and recognising the legitimate interests of other stakeholders. The Company has policies regarding the timely provision of information to its shareholders and other stakeholders including posting information to its website. It has processes to ensure that the accounts and financial information it provides represent a true and fair view of the financial performance and position of the Company.

You must fully cooperate with, and not make any false or misleading statement to, or conceal any relevant information from, the Company's auditors.

5. Governments and Communities

5.1. Political and charitable donations

All dealings with politicians and government officials which relate to the Company and its business activities must be conducted at arm's length and with the utmost professionalism.

Donations to any political party, political candidate or elected official are prohibited (Please see Policy E6 – Political Donations)

All employees must obtain prior approval of their business unit General Manager for any contributions to charities on behalf of Brickworks.

5.2. Environment

At Brickworks, caring for the environment is essential. Brickworks is committed to compliance with environmental laws and regulations and minimising environmental harm.

All employees and contractors are accountable for observing environmental laws and ensuring the Company's activities are properly licensed and their actions and operating practices do not adversely impact the environment and communities in which we operate.

Employees and contractors must report to their supervisor or manager in a timely manner any actual or potential impact to the environment from an accident, incident, spill or release of material so that appropriate action can be taken to prevent, correct and/or control those conditions. Complaints received via the community must also be reported or relayed to site managers.

Unless prior authority has been obtained by the relevant regulatory bodies, no waste materials are to be brought to or stored on any Brickworks site. This includes construction or demolition by-product, soils, rock or excavated materials or any other raw material substitute not sourced from Brickworks quarries, but does not include production wastes stockpiled for reuse on-site.

All non-reusable wastes from site must be removed by licenced waste contractors and/or disposed of at licenced waste facilities.

Brickworks employees and contractors are required to be familiar with and comply with the Brickworks Environmental Policy and all environmental procedures.

6. Using Company resources

As employees of Brickworks we all have an obligation to protect the Company's assets and use them for their intended purpose.

Employees must use Brickworks resources assets and information communication systems responsibly and appropriately. Employees are not permitted to use any Brickworks property (including intellectual property or information, resources or assets) for any non-Brickworks activity (other than an incidental and minor personal purpose), unless prior written approval has been given by your General Manager or the Board (if you are a Director).

6.1. Protect and keep Brickworks information confidential

Brickworks intellectual property and confidential information are valuable assets that all employees must take precautions to protect and secure at all times.

Confidential information includes non-public financial, strategic, corporate, operational, technical and personal information in respect of Brickworks, its employees, customers and suppliers.

Employees must not share such confidential information unless authorised to do so. This obligation continues to apply after termination of employment. No confidential information, including records of any kind is to be retained, used or disclosed by a departing employee.

All employees must help protect all confidential information by ensuring Brickworks Group Technology and Digital Security protocols are followed at all times.

Any suspected theft of intellectual property or unauthorised disclosure or access to Brickworks information should be reported immediately to the Chief Information Officer.

The product of any work performed while you are with the Company or on behalf of the Company or using Company property belongs to the Company.

6.2. Cyber security

Brickworks provides employees with information technology to undertake its role. Computer hardware, software and data stored on Brickworks information technology platforms and personal devices are the property of Brickworks.

The safeguarding of this information technology against damage, loss, theft, alteration or unauthorised access is the responsibility of all Brickworks employees.

Security controls are in place and reviewed continuously to protect against emerging cyber threats.

Using Brickworks information technology for an inappropriate use or for storing or accessing inappropriate material is a serious matter for which disciplinary action may be taken and/or authorities notified.

Examples of inappropriate use of Brickworks information technology includes installing software without authorisation, accessing business applications or systems for which there is no business justification, using such systems for sharing confidential information of Brickworks or engaging in online fraud.

Examples of storing or accessing inappropriate material using Brickworks systems includes pornographic images, materials promoting violence, hatred or terrorism or any material deemed obscene or abusive.

Employees should treat emails and other forms of electronic communication as official Brickworks records. Brickworks reserves the right to access, review and disclose data stored on its systems for maintenance purposes, business needs or to meet legal or policy requirements.

6.3. Communicating externally

Employees must not make public statements or participate in any type of media interview on behalf of the Company on work-related subject unless specifically authorised to do so by the Managing Director. This applies when "off the record" comments may be requested informally by the media.

Only employees who are specifically authorised and trained should represent Brickworks to shareholders, the public or the media. This is to ensure that Brickworks complies with the law and the company's interests are protected.

For employees who receive an inquiry from outside the company and are not authorised to respond they should be friendly and courteous but not share information about Brickworks. The inquiry must be referred to the Managing Director.

6.4. Insider trading

Insider trading laws prohibit a person in possession of material non-public information relating to a company from dealing in that company's securities. Insider trading is a serious offence under the Corporations Act.

The Company's Trading Policy is available on the Company's website. It provides guidance so that you do not deliberately or inadvertently breach the insider trading laws or the Company's policy.

7. Breaches

All employees have a responsibility to report a breach of this policy or behaviour which may lead to a breach of this policy.

Employees should talk to their Manager or General Manager immediately if they see or suspect a breach of the Code of Conduct. If you are concerned about your business involvement you can request that the matter be referred to the Group People & Performance Manager or the General Counsel.

Alternatively, Brickworks offers an independent third-party hotline service (Be Honest @ Brickworks) which gives employees the opportunity to anonymously report serious concerns of suspected or

actual breaches of the Code of Conduct such as theft, fraud, dishonesty and unethical behaviour. Further information on how to lodge a Be Honest @ Brickworks report can be found on the Brickworks intranet.

Employees are required to provide full and complete co-operation with any investigation related to actual or potential breaches of this Code. If any breach of this Code is found to have occurred, Brickworks reserves the right to initiate disciplinary action which may include a verbal or written warning, suspension or dismissal.

Brickworks will not tolerate retaliation or victimisation against anyone who raises a genuine concern under this Code of Conduct or assists with an investigation.

8. Further Assistance

For further information, please speak to your Manager, your General Manager, Human Resources or Company Secretary/General Counsel.