

Code of Conduct

1. Purpose

At Straker, we are committed to fostering a supportive, inclusive, and progressive workplace where all our employees feel valued and empowered to be their very best. Our Code of Conduct (Code) sets out our core ethical principles in carrying out our business and should guide our interactions, decisions, and actions within and outside of our organization. We place great importance on honesty, integrity, quality and trust and we all share the responsibility of observing this Code whenever we are identified as representatives of Straker.

While this Code does not contain a comprehensive list of acceptable ethical behavior, it will help us to make decisions in our day-to-day work – whoever we are, whatever we do and whenever we do it. These standards are driven by our internal values.

2. Our Key Principals

Each of us is responsible for our own behavior and we all need to take accountability for the choices we make. In making informed choices, we must have regard to Straker's key principles.

- We value our reputation
- We are professional
- We keep our workplace safe and sound
- We steer clear of conflicts of interest
- We respect confidentiality and privacy
- We act morally
- We respect local laws
- We are good corporate citizen
- We respect this Code
- We are a team
- We respect the environment

3. We Value Our Reputation

We have a great reputation in the market, and we want to keep it. Each of us has the ability to maintain and build that reputation. To do that, we always undertake our duties with care and diligence, and we deal fairly and honestly with each other, and with Straker's, customers, suppliers, competitors and any other third parties.

4. We Are Professional

We foster a safe working environment that is inclusive and promotes wellbeing. We treat everyone we deal with at work with dignity and respect. We are familiar with and comply with all our employment policies which can be found in our Knowledgebase.

Inappropriate behaviour, including harassment, discrimination, bullying and intimidation, will not be tolerated in any circumstances.

Discrimination or harassment based on race, colour, religion, gender, age, marital status, disability or other factors unrelated to legitimate business interests, will not be tolerated.

- We are entitled to our own personal preferences in private or political matters.
- No pressure should be placed on anyone to influence those preferences and no approval or disapproval of anybody's private or political preferences or activities should be shown by anyone in their role at Straker.

Employment and advancement decisions within Straker will be based upon merit, qualifications and competence and will not be issued or affected by unlawful discrimination on grounds of gender, age, marital status, sexuality, parental status, pregnancy, physical features, disability or impairment, ethnic origin or religious political or other beliefs.

5. We Steer Clear of Conflicts of Interest

We make sure our individual interests do not interfere with Straker's interests, and we immediately disclose to our managers any business or personal relationships we have which might impact, or appear to impact, Straker's decision making processes. The perception of a conflict of interest can do as much damage to Straker's reputation as an actual conflict of interest, so we always keep an arm's length relationship when dealing with customers, suppliers, or partners.

6. We Respect confidentially and Privacy

In our work at Straker, we are entrusted with private and confidential information relation to Straker, colleagues, customers, suppliers and other third parties. We respect the sensitive nature of this information and understand that misuse of this information could have severe consequences for those whose information is misused. We protect all private and confidential information entrusted to Straker, and we never misuse it.

7. We Act Morally

We aren't interested in any improper payments, benefits, or gains of any kind. We don't do anything which might suggest that we are giving preferential treatment to a person or company that is offering a reward or gift. We only entertain customers and business associates in a manner approved by management, which includes avoiding any actual or perceived conflicts of interest.

8. We Respect Local Laws

As a global business, Straker is subject to laws and regulations in all the locations in which we operate. We stay up to date and always comply with all applicable laws and act honestly and in good faith. We respect the customs and business practices of the countries in which we operate while not compromising the principles embodied in this Code.

9. We Are Good Corporate Citizens

We care about our customers, our shareholders, and our staff. We always meet our responsibilities to the financial community, and we make meaningful contributions to the wider community whenever we can.

10. We Respect and Use Straker Assets for Proper Purposes

Straker assets, including goods, money, intellectual property, or the services of other Straker employees and contractors, must not be used for personal gain. This includes, but is not limited to:

- Improper use of Straker's company information.
- Transcription of computer software programs regardless of whether the programs are protected by copyright.
- Falsification or improper use of corporate cards, expense accounts or other similar accounts
- Unauthorized use of the Straker logo/trademark

Straker's property is not to be removed from Straker's premises without authorization. Every employee while in control of any Straker assets, particularly cash or other valuables, is personally responsible for them.

11. We Respect this Code

Each of us has a responsibility to abide by this Code and its principles, and to report any conduct that may be in breach of the law, this Code or any other Straker policies. This means we are always conscious of what others around us are doing, and we honestly report all actual and suspected breaches to leadership or our People and Culture team. Anyone who breaches this Code may face disciplinary action including termination of their employment or engagement with Straker. No action will be taken against a person reporting a suspected breach in good faith.

12. We are a Team

We're always innovating and growing, and we solve hard problems that others can't. We work hard and we celebrate success as one team

13. We Respect the Environment

We are all responsible for maintaining and protecting the environment. We should, therefore, always consider the impact of our activities on the environment and the local community, including the way in which waste is disposed and natural resources utilized

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