



ETHICS & INTEGRITY POLICY

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The purpose of this policy is to set out clearly how Cladtek and its employees will behave in all our business activities and relationships including labor relations, negotiations with customers, suppliers and subcontractors, and interaction with government authorities and the community.

It is Cladtek policy that all employees must exercise the highest standards of ethical behavior in all actions, and at all times. We hold transparency and openness in high regard and believe that the strongest test of our actions is that no matter where or how or who reviews those actions, they will be seen as ethical, and reflective of values commensurate with the highest standards of integrity.

For Cladtek, acting with integrity means saying clearly and openly what we will do, and then doing what we say.

Cladtek places a high value on the rule of law, and whilst we expect the highest standards of ethics and integrity from our employees, we also believe that our employees are entitled to be fairly judged in regards to their actions and behavior and with regards to the evidence available.

Cladtek will promptly and rigorously investigate any and all alleged breaches of this policy, including any allegations of bribery, corruption, fraud, theft, misappropriation, breach of any applicable law, or acts that deviate from the policies and values of Cladtek.

Cladtek wholly repudiates any form of corrupt practice. Employees must reject, must not participate in or condone, and must act to eliminate any form of corrupt practice, whether direct or indirect, public or private, including practices of favoring, undue influence, peddling, extortion, or kickbacks. All aspects of all transactions and dealings must be transparent, and must not create any conflict of interest,

Cladtek does not permit making or receiving any form of payment whether monetary or in kind, in order to gain an advantage in relations with its partners, whether customers or suppliers or others.

Any inappropriate conduct shall be subject to appropriate sanctions, which may include warnings, suspension or dismissal for cause, as relevant to the circumstances of each case, and respecting principles of fairness.

Cladtek policy on Ethics and Integrity is based on the following values and principles:

1. To act honestly and with integrity at all times,
2. To act within the law as applicable to our business and our contracts,
3. To be free and encouraged to raise with senior management any concerns regards matters of ethics or integrity, in confidence, and without any fear of retribution,
4. To make a stand against corruption, and to recognize the risk that corrupt practices place on our business and future,
5. To act safely and in a professional manner at all times,
6. To act respectfully to others,
7. To act without discrimination and treat everyone equally and fairly regardless of sex, race, religion, status, disability or any other measure that has no bearing on performance or capability.

Cladtek undertakes to review and update this policy on an annual basis. Cladtek also undertakes to ensure that our staff are made aware of the policy and where appropriate, provide training on and in support of the policy.

A handwritten signature in black ink, consisting of a large, stylized initial 'G' followed by a series of loops and a long horizontal stroke extending to the right.

General Manager