



Code of Conduct Policy

Fulton Hogan Group Policy June 2026

Do the right thing

Our success depends on consistently acting with professionalism, honesty and integrity, at all times. We always treat others with respect, address issues directly and professionally, and uphold clear standards of behaviour. We respect the law and hold everyone in the company to account.

We will:

- Conduct business in accordance with our REAL values of Respect, Energy & Effort, Attitude and Leadership
- Follow all lawful and reasonable directions in relation to our work
- Encourage our suppliers, customers and partners to do the right thing
- Empower our people to speak up, without fear, and protect those who do so
- Use company assets and systems lawfully, responsibly and only as authorised
- Avoid actions or activities that may give rise to a conflict of interest, or may impact on the reputation and standing of the company
- Not make unauthorised gains or payments, and will not engage in unethical conduct
- Operate in line with documented standards and procedures

A handwritten signature in black ink, appearing to read 'G. Johnson', with a long horizontal stroke extending to the right.

Graeme Johnson
Group CEO