

Introduction

Pyramid Builders Ltd takes great pride in its reputation as a progressive and professional company which strives for excellence in all of its endeavours. The Company is conscious of its place within the community and the need to adhere to the highest standards of business conduct and compliance with the law and best practice. Pyramid Builders Ltd.'s continued success will be assisted by the maintenance of the highest standards of integrity from all employees.

To assist employees in maintaining the Company's reputation, a written Code of Conduct has been developed which defines Pyramid Builders Ltd.'s basic principles of business conduct. Among other things the Code is intended to promote:

- Honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships.
- Full, fair, accurate, timely and understandable disclosure in reports and documents that the Company files and communicates as necessary.
- Prompt internal reporting to the persons identified in this Code of violations of this Code.
- Accountability for adherence to this Code.

Whilst the Code outlines the minimum standards of behaviour required of each of our directors, officers, and employees, Pyramid Builders Ltd also expects all of its personnel and contractors to strive to achieve levels of performance which exceed basic compliance. The Managing Director is strongly committed both to the letter of this Code and to the spirit of best practice underpinning it, and expects similar commitment for all of Pyramid Builders Ltd.'s employees and contractors. Please take the time to read the Code carefully. By following these principles, you should feel confident and comfortable that you are conducting yourself appropriately.

This Code should also be read in conjunction with the various policies, associated plans and handbooks of Pyramid Builders Ltd which (among other things) address in more detail some of the topics covered in this document.

2. Scope and Applicability

2.1 Scope

The Code of Conduct ("Code") of Pyramid Builders Ltd sets forth the basic guidelines that Pyramid Builders Ltd expects from its officers, director and employees to follow in dealing on behalf of the Company with governmental entities, the general public, the Company's customers, creditors, External Providers and competitors, and with fellow Company personnel.

The following information constitutes the Company's Code, which applied to the Company's officers, directors and employees. All references in this Code to "senior managers" should be read to include the heads of each business and those senior managers who directly report to them. References in this "Code" "employees" should be read to include all of the Company's officers, directors, and other executives and senior managers, along with all other employees.

This code reflects general principles to guide employees in making ethical decisions and cannot and is not intended to, address every specific situation. As such, nothing in this Code prohibits or restricts the Company from taking any disciplinary action on any matters pertaining to employee conduct, whether or not they are expressly discussed in this document. Nothing in this document creates any employment contract between the Company and any of its employees.

No policy can be complete in all respects. Good judgement based upon an understanding of the laws and regulations of ethics is the best safeguard against improper or unethical conduct. Each employee is expected to attain a level of understanding of the Code that will permit the proper exercise of such judgement. In those circumstances where such

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judgement should be questioned, employees should seek advice, as appropriate, from their supervisors, managers, Human Resource office, Director.

2.2 Applicability

The guidelines set forth in this Code apply to all employees and all Company related transactions. Each employee must be familiar with this Code and its applicability to his or her particular function. Moreover, those with supervisory responsibilities must ensure that employees under their direction or control are acquainted with applicable portions of the Code. Company offices and directors should be aware that there are special legal requirements not covered by the code that will apply to corporate fiduciaries.

All employees, regardless of their level or location, have a responsibility to review, understand and adhere strictly to the standards set forth in this Code. In addition, all employees are expected to perform their work with honesty and integrity in any areas not specifically addressed by this Code.

The Company strongly encourages dialogue among employees and their supervisors regarding situations that give rise to ethical questions and to articulate acceptable ways of handling those situations. In addition, every employee must certify that he or she has read this Code and, to the best of his or her knowledge is in compliance with all its provisions.

The Company's internal auditors and legal staff will monitor compliance with the Code to assure that the Company conducts itself in a manner consistent with its obligations to society and its stakeholders.

3. Company Policies, Standards and Guidelines

3.1 Compliance with Ethics and the Law

Employees must act honestly and ethically at all times and comply with the letter, and where it is clear, the spirit of all laws and regulations relevant to their work and complying with the legal requirements of the country in which they are working.

The Company's commitment to full compliance applies to all applicable laws, regulations etc. of all or any other country where the Company transacts its business.

Legal obligations arise in important areas such as anti-competitive practices, equal employment opportunity, occupational health and safety, and protection of the environment.

The laws that govern our activities are often complex, but ignorance of them does not excuse the Company or its employees from their obligation to comply. Even the appearance of illegal, dishonest or inappropriate behaviour could have a negative impact on the Company and its employees. Breach of the law may result in the payment of penalties by you/and or the Company, and even imprisonment. It is Company policy to not pay a penalty imposed on an employee for contravention of the law. An employee must seek advice from their supervisor/senior manager if he or she is unclear about the laws or regulations relating to his or her work practices.

In addition to compliance with all legal requirements, each employee must adhere to the overriding ethical and professional standards generally governing the conduct of the business. The Company's interest is not served by any unethical practice or activity, even though not in technical violation of the law.

The Company and its employees will at all times transact business in full compliance with the law and in accordance with the highest principles of business, ethics and conduct. The guidelines in the Code are to be strictly adhered to at all times and under all circumstances. A violation of this Code may result in appropriate disciplinary action including the possible termination of employment with the Company, without additional warning.

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3.2 Safety, Health, Environment and Community (“SHEC”) Policy

- Safety and Health. The Company is committed to providing a safe and healthy work environment. The safety of the individual comes before all other considerations.
- Environment. The Company is committed to the ecologically sound and sustainable use of resources and strives to operate in a manner which minimises waste and protects the environment.
- Community. The Company aims to be a respected corporate citizen by work constructively with its communities and other stakeholders.
- Support. To achieve its commitment, the Company will support and implement SHEC policies, standards and management systems. The Company’s commitment to continual improvement of SHEC in its business is supported by leadership, policy, planning, implementation, measurement, evaluation and management review.

Pyramid Builders Ltd recognises that its continued growth and success will only be achieved through continued improvement of its SHEC program and commitment to industry leadership. SHEC Principles:

- All employees are obligated to stop or refuse to perform a task if it cannot be performed safely or compliant with SHEC requirements.
- There is no such thing as an accident.
- Every employee is accountable for his or her SHEC performance.
- SHEC responsible conduct is a condition of employment.
- SHEC is also a line management responsibility.
- Efforts in SHEC will yield results in SHEC.

3.3 Environment

Pyramid Builders Ltd is committed to the ecologically sound and sustainable use of resources. It strives to operate in a manner which minimises waste and prevents pollution. The Company actively supports the protection of the environment and the conserving of natural resources.

- At a minimum, all Pyramid Builders Ltd.’s operations are to comply with relevant statutory requirements.
- Pyramid Builders Ltd will regularly monitor its environmental performance, objectives and targets and ensure that support functions exist to effectively maintain and continually improve environmental standards.
- Environmental care is of equal importance to every facet of the Company’s management and operations.
- Pyramid Builders Ltd will continue to promote individual commitment to safe and environmentally responsible behaviour through the training and education of, and dissemination of information to, all relevant staff.

Management at all levels of the Company is to actively encourage the implementation of these broad principles in their area of business activity and ensure that the environmental management procedures of Pyramid Builders Ltd are observed.

Pyramid Builders Ltd has adopted an Environment Policy outlining the Company’s approach to environmental matters. All employees should familiarise themselves with that policy and any plans made under it.

3.4 Safety and Health

Pyramid Builders Ltd is committed to:

- Providing a safe and healthy work environment for all its employees, contractors, visitors and External Providers and complying with all relevant occupational health and safety requirements, including rules, regulations and standards applicable in all the jurisdictions in which it operates.
- Providing sufficient staff and monetary support, including the use of external consultants as required, to ensure that best practices exist.

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- Consultation and co-operation between its management and elected employee safety representatives, or safety committee members and employees, regarding safety and health.

The Company's principal objectives are to:

- Ensure that safety comes before all other considerations.
- Provide the necessary information, instruction and training to all relevant employees, contractors and advisors so that they appreciate their responsibilities for safety and health.
- Maintain sound general working conditions through the provision of adequate facilities.
- Seek improvement in all areas by integrating safety with operational objectives, supported by risk management principles, including the carrying out of appropriate risk assessments, in order to seek to eliminate the risk of injury.

In order to achieve these objectives, line managers are directly responsible for ensuring that:

- A safe place of work exists
- A safe system of work exists
- Employees are trained in the safe performance of their assigned tasks.

Employees and contractors are expected to:

- Follow all safe work practices and procedures
 - Report unsafe conditions or practices
 - Suggest improvement relating to safety and health
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- Look out for their own safety and that of other persons at work, including visitors, contractors and External Providers. The Company actively support the concept of rehabilitation.

Pyramid Builders Ltd has adopted a Safety and Health Policy outlining the Company's commitment to a safe and healthy work environment. All employees and other affected persons should familiarise themselves with that policy and any plans made under it.

3.5 Community

Pyramid Builders Ltd is committed to limiting its impact on the community in which it operates, and to working with the community to ensure that the business does not have a negative effect.

3.6 Product and Service Quality

It is Pyramid Builders Ltd.'s policy to produce and deliver products and services to its customers that are of an internationally recognised standard and price competitive.

This policy is driven by:

- Focusing all employees at every level on their individual responsibility for maintaining and improving product quality and service reliability.
- Educating, training and developing all employees to meet, and exceed, customer's requirements and standards.
- Continually monitoring quality standards and measuring each employee's performance against this standard.
- Establishing appropriate quality control and audit functions
- Reacting promptly and in a constructive manner to quality and service complaints and ensuring that lasting and remedial actions are taken.

3.7 Equal Employment Opportunities

Pyramid Builders Ltd is committed to developing a diverse workforce and to providing a work environment in which everyone is treated fairly and with respect, and free of unlawful discrimination.

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Employment and advancement with Pyramid Builders Ltd must be offered and provided based on merit, qualifications, and abilities. All employees and applicants for employment or advancement should be treated and evaluated according to their job-related skills, qualifications, abilities and other lawful factors. Employment and advancement decisions based on attributes unrelated to job performance or other lawful factors (for example, race, colour, gender, religion, personal associations, national origin, age, disability, political beliefs, marital status, sexual orientation) may constitute prohibited discrimination. Decisions relating to External Providers, customers, contractors and other stakeholders should also be based on merit and other lawful factors.

3.8 Harassment and Intimidation

Only in the absence of a local policy regarding harassment, discrimination or workplace violence or intimidation the following policy applies:

Pyramid Builders Ltd is committed to providing a work environment in which everyone is treated free of unlawful discrimination and intimidation.

It is the responsibility of management to ensure all workplace decisions and activities are free of improper and unlawful harassment and discrimination.

Harassment refers to conduct or behaviour which is personally offensive, or threatening, impairs morale or interferes with the work effectiveness of employees. Harassment in any form is unacceptable.

Company management will promptly investigate and respond to all complaints of discrimination or harassment. Investigations will be conducted on a professional, discreet and impartial manner, maintaining confidentiality to the maximum extent consistent with a proper inquiry. Reprisals for reporting genuine concerns about discrimination or harassment are prohibited.

The display or transmission of material likely to cause offence to employees, visitors, and/or customers, will not be permitted on Company premises or equipment.

The Company considers unlawful discrimination or harassment to be serious misconduct, which will result in appropriate disciplinary action, up to and including dismissal.

3.9 Human Rights and Modern Slavery

Only in the absence of a local policy regarding Human Rights and Modern Slavery the following policy applies

Using our risk-based approach, I will also assess the merits of writing to suppliers requiring them to comply with our code of conduct, which sets out the minimum standards required to combat modern slavery and trafficking upholding ETI base code principles (including protection of workers' rights, freedom of association, forced and bonded labour, wages, working hours, child labour, discrimination and working conditions).

Imported goods from sources from outside the UK and EU are potentially more at risk for slavery/human trafficking issues. The level of management control required for these sources will be continually monitored.

I will not permit my company to support or deal with any business knowingly involved in slavery or human trafficking. My Directors and Senior Management Team shall take responsibility for implementing this policy statement and its objectives and shall provide when deemed necessary adequate resources (training, etc.) and investment to ensure that slavery and human trafficking is not taking place within the organisation and within its External Providers.

I shall expect that everyone working with us or on our behalf supports and uphold prevention, detection, and reporting of modern slavery in any part of our organisation or supply chain. Workers should not engage in, facilitate, or fail to report any activity that might lead to, or suggest, a breach of this policy

We are committed to engaging with our stakeholders and suppliers to address the risk of modern slavery in our operations and supply chain. We will take a risk base approach to our contracting processes and keep them under review. We assess whether the circumstances warrant the inclusion of specific prohibitions against the use of modern slavery and trafficked labour in our contracts with third parties. Using our risk based approach, we will also assess

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the merits of writing to suppliers requiring them to comply with our Code of Conduct, which sets out the minimum standards required to combat modern slavery and trafficking.

Consistent with our risk-based approach we may require:

- Employment and recruitment agencies and other third parties supplying workers to our organisation to confirm their compliance with our Code of Conduct
 - Suppliers engaging workers through a third party to obtain that third parties' agreement to adhere to the Code
- As part of our ongoing risk assessment and due diligence processes, we will consider whether circumstances warrant us carrying out audits of suppliers to their compliance with our Code of Conduct

If we find that other individuals or organisations working on our behalf have breached this policy, we will ensure that we take appropriate action. This may range from considering the possibility of breaches being remediated and whether that might represent the best outcome for those individuals impacted by the breach to terminating such relationships.

PBL will conduct thorough vetting process for all suppliers and contactors. All the above agree to work in conjunction with the Code of Conduct document and more specifically with the Modern Slavery Policy set by the business.

3.10 Insider Trading

It is unlawful to deal in securities of a company while in possession of material information about the company which has not become public.

If you are in possession of information concerning Pyramid Builders Ltd that is not generally available, and which a reasonable person would expect to have a material effect on the share price, it is unlawful for you to buy, sell or otherwise deal in Pyramid Builders Ltd Securities. It is also unlawful to encourage someone else to deal in Pyramid Builders Ltd Securities or to pass information to someone you know may use the information to buy or sell Pyramid Builders Ltd Securities. There are serious penalties, including possible imprisonment, for violations of the relative laws.

A person does not need to be a director or employee of the Company to be guilty of insider trading. The prohibition extends to dealing by directors and employees through nominees, agents or other associates, such as family members, family trusts and family companies.

It does not matter how or where the person obtains the information – it does not have to be obtained from the Company to constitute inside information.

Employees who from time to time have access to price-sensitive information concerning the Company – for example negotiation of a major transaction which has not yet reach fruition – must consider their position carefully, when considering dealing in Pyramid Builders Ltd Securities (or communicating with others about Pyramid Builders Ltd or that information, to ensure that they do not do so at a time when it would be unlawful. Employees may also from time to time have access to price-sensitive information concerning other companies (for example, if they are involved in assessing a company for possible acquisition, or in negotiation or award of an important contract to an External Provider or customer of Pyramid Builders Ltd). In such circumstances, employees should again take care to ensure that they do not communicate that information or deal in securities of that other company if to do so would be unlawful. If in doubt, advice should be sought from the Company Secretary/Managing Director.

3.11 Alcohol and Drug Use

Only in the absence of a local policy regarding alcohol and drug use for Pyramid Builders Ltd the following policy applies:

Every employee is responsible for taking appropriate steps to prevent workplace injuries and illnesses and for contributing to a safe and health work environment. This obligation includes responsible behaviour with respect to the use of alcohol and drugs at work, when conducting Company business and at Company sponsored activities. The use of drugs or alcohol may impair an individual's capacity to perform his or her job safely, efficiently and with respect for work colleagues and customers.

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Employees must not be under the influence of illegal or legal drugs, including alcohol, while at work or when conducting Company business, including the driving of Company vehicles. Being so impaired may result in the risk of injury or a threat to the wellbeing of the impaired employee, other employees, customers or other third parties.

Failure to comply with this policy will be regarded as serious misconduct that may lead to dismissal. Further, Pyramid Builders Ltd will not accept liability for any injury or damage to a person or property incurred while an employee is in breach of this policy or of the law. In addition Pyramid Builders Ltd prohibits the possession, transfer, or use of illegal substances on Company premises, when engaged in Company business, or at Company functions.

3.12 Policy regarding smoking

To prevent passive smoking exposure, all Company buildings and sites must either be non-smoking or have designated smoking and non-smoking areas. Smoking is prohibited in all Company offices, shared work areas and in other communal areas such as conference rooms, lunchrooms, reception areas, first aid rooms, and other places in which smoking creates significant fire risk.

If smoking areas are provided and allowed by law, they should be separated from adjacent work areas, clearly marked, adequately ventilated and reasonably convenient.

3.13 Using Company Resources and Fraud Protection

Employees must not use Company funds, property equipment, or other resources for personal benefit. Employees are also responsible for safeguarding Company resources, including information, under their control, and for maintaining accurate records regarding the use of these resources. Instances of fraud by their very nature represent unacceptable behaviour within the Company and should on all occasions be reported to senior management. Fraud may involve some form of deceit, theft, trickery or making of false statements, breach of trust with the object of obtaining money or other benefit. A fraudulent act can have significant consequences to the Company and the individuals involved.

At all times, employees are to use Company funds sensibly and effectively. Expenditures must be reported accurately and in a timely way. Submission of a fraudulent expense report is regarded as serious misconduct which will result in appropriate disciplinary action, up to and including dismissal.

Accurate and auditable records of all financial transactions relating to the Company must be maintained, and employees must strictly abide with the Company's policies and procedures for handling cash purchases/payments. Non-financial records (for example, personnel files, environmental documentation, safety statistics, etc.) must also be accurately and rigorously maintained.

Unauthorized removal of Company equipment, supplies or other resources is regarded as theft. Similarly, Company resources must not be sold, loaned, or donated without management approval. Employees should take appropriate precautions to prevent theft, damage, or misuse of Company resources.

Employees should not destroy or dispose Company resources without management approval unless the items of nominal value and can no longer be used (for example, office supplies). Intentional damage of Company resources is prohibited.

The storage and disposal of Company accounts, records and other documentation should be in accordance with Company standards and guidelines.

3.14 Information Systems

Employees of Pyramid Builders Ltd use a wide range of information systems to conduct business (for example, facsimile, the internet, electronic mail, etc.). Employees are responsible for protecting Company information communicated or stored using these systems.

All hardware, software and data must be adequately safeguarded against damage, loss, theft, alteration and unauthorised access. Sensitive transactions (for example, contractual commitments, financial transfers etc.) must not

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be conducted electronically unless appropriate security controls are implemented and the transaction is auditable. If authentication is important, the transaction should be confirmed using non-electronic means.

The use, duplication, or sale of proprietary software, except as described in the manufacturers/owners license agreement or conditions applying to use is an infringement of copyright law and is strictly prohibited.

The Company's electronic communications systems are the property of the Company and all electronic communications are regarded as Company records.

Pyramid Builders Ltd reserves the right to monitor and log the use by employees of its information systems including, but not limited to, email, internet access, mobile phone use, telephone use, files contained on file servers and Company business applications.

Employees have access to Company information systems to assist them in performing their jobs. Personal use must be approved by management. Modest personal use may be allowed provided it is unrelated to outside business activities and does not interfere with Company business or the performance of work responsibilities. Significant personal use is not permitted.

3.15 Outside Activities

An employee must receive the approval of the Company before accepting a directorship in another business corporation, statutory authority or similar body if such directorship would preclude that employee from fulfilling any of his or her responsibilities to the Company. The Company will consider each case on its merits. Due to the potential for a conflict of interest in such a situation the employees should seek approval in accordance with the Conflicts Approval Procedure outlined in section 3.18 of the Code.

Similarly, employees should not take on additional employment with outside organisations or operate their own business if it impairs their ability to fulfil their responsibilities to the Company. If in doubt the employee should refer to section 3.18 of the Code.

3.16 Confidentiality

Employees are required to protect proprietary, commercial and other information that is confidential to Pyramid Builders Ltd. This encompasses information Pyramid Builders Ltd owns, develops, pays to have developed, or to which it has an exclusive right of use. It may include pricing information, customer and employee records, sales or marketing documents, financial data, research and development products, and any other information that could be used by a competitor to place Pyramid Builders Ltd at a competitive disadvantage. If allowed by law, these obligations of confidentiality continue after the conclusion of an individual's employment with Pyramid Builders Ltd.

Confidential information must only be used for authorised purposes. Such information should be handled and communicated with care, and must not be disclosed outside the Company without proper authority. It must never be used for personal gain.

As appropriate, confidentiality provisions should be included in contacts with consultants, contractors, and other parties who provide services to the Company.

3.17 Privacy Commitment

During the course of its activities, Pyramid Builders Ltd may collect, hold and use personal information about External Providers of goods and services, customers, contractors and prospective employees. Personal information is information or an opinion about an individual whose identity is apparent or can reasonably be ascertained from the information or opinion.

Any information must be managed in a professional and ethical manner.

All employees must abide with specific policies on privacy/personal information collection applicable to relevant geographical regions in which the Company operates.

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3.18 Intellectual Property

Employees who participate in the development of processes or products that will be used by the Company, or who have access to the results of such work, must regard this information as the property of Pyramid Builders Ltd both during and after their period of employment with the Company to the maximum extent by law.

3.19 Conflicts of Interest

Employees should not engage in activities that involve, or could appear to involve, a conflict between the personal interests and the interests of Pyramid Builders Ltd (that is, conflicts of interests). Such circumstances could compromise an employee's ability to make impartial business decisions. This means that an employee must not place themselves in situations that might force them to choose between their own personal or financial interests and the interests of the Company.

If in any doubt, an employee must disclose any potential or actual conflict of interest situation. An employee must not engage in any activity involving a potential conflict of interest until approval has been by senior management.

Example:

Conflicts of interest would not usually arise out of merely holding shares in a listed company where such an interest comprises securities in widely-held corporations that are quoted and sold on the open market, and the interest is not material (less than five percent of the outstanding securities).

Neither employees nor their immediate family members should have interests or investments in, or employment with, a competitor, customer, partner or External Provider of Pyramid Builders Ltd that would create a conflict of interest such as if the employee's position in the Company allows them to influence transactions with the other person or entity.

An employee should not be in a position of influence regarding employment conditions (for example, work assignment, compensation etc.) or performance assessment of a family member.

It may be considered to be a conflict with the Company's interest or a violation of trust for a director, office or employee or any immediate member or his or her family:

- To buy, sell or lease any kind of Company material, property, facilities or equipment from or to the Company or from or to any company, firm or individual who is seeking to become a contractor, External Provider or customer or to buy or sell any kind of business related material from or to any company, firm or individual.
- To accept commissions, a share in profits (other than dividends or interest on securities of widely-held corporation) or other payments, loans (other than with established banking or financial institutions) services, excessive entertainment and travel or gifts of more than nominal value from any individual or organisation doing or seeking to do business with the Company, or
- To take advantage of any opportunity for personal gain that rightfully belongs to the Company, including business opportunities of which an employee becomes aware of his or her employment by the Company, whereby such opportunities must be offered to the Company.

In some cases, a potential conflict of interest or violation of trust may be approved if reported to senior management and investigated prior to the event. This would occur where such approval is in the best interests of the Company. However, the employee must make a full disclosure of the facts prior to any transaction or other potential conflict situation. This ensures the Company can make an informed, independent decision regarding the transaction or other potential conflict situation.

Effect of violations

As with any violation of this Code, a violation of the above conflict of interest provisions may result in disciplinary action or dismissal from employment and may also subject the employee or former employee to civil liability and/or criminal prosecution under the applicable law.

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Even so, not every potential conflict of interest is a Code violation. Under some circumstances, following full disclosure by the employee, the Company may independently decide to engage in a particular transaction or allow a particular activity or other potential conflict of interest situation that is beneficial to the Company notwithstanding the personal conflict. In such a case where approval has been given, the above conflict of interest provisions are not violated. Therefore, the effect of a particular actual or potential conflict of interest or violation of trust will depend upon the nature of the conflict or violation, its disclosure by the employee, receipt of appropriate approvals, its effect upon the Company, the severity of the violation and the means available to recompense loss or prevent future injury. Any conflict allowed by the Company, must be detailed and signed by senior management.

3.20 Gifts

Employees must exercise the utmost care about giving or receiving business-related gifts. This applies to direct payments and payments in kind, including the provision of goods or services, personal favours, and entertainment.

Accepting or offering gifts of moderate value is generally acceptable in situations where to do so is legal and on accordance with local business practice. If there is any doubt about their acceptability, the situation should be referred to a senior manager. Employees should ensure a senior manager is aware of all gifts of any significance.

Under no circumstances should an employee request a gift of any kind from an External Provider, customer, competitor or other party with who Pyramid Builders Ltd conducts business.

This policy also applies to an employee's immediate family member and to any agents or third parties employed by the Company to represent its interests.

3.21 Books and records

Accuracy and reliability in the preparation of all business records is mandated by law and is of critical importance to the Company's decision making process and to the proper discharge of Pyramid Builders Ltd.'s financial, legal, regulatory and reporting obligations. Applicable laws require the Company to maintain accurate books and record and to devise an adequate system of internal controls. Such laws provide for criminal and civil penalties for violations of these requirements.

The integrity of the Company's records and other business information is based on the accuracy and completeness of the information supporting the entries to the Company's books of account. Therefore all employers, officers and directors involved in creating, processing or recording such information are responsible for it accuracy and completeness. They must endeavour, to the best of their ability, to ensure that all entries, books, records and accounts of the Company accurately and fairly reflect the Company's operations, transactions, and acquisition and disposition of assets. No entry should be made in the Company's records that distorts or disguises the true nature of any transaction. Direct or indirect falsification of such documents, whether by alteration, destruction, intentional omission, misstatement or otherwise, is strictly prohibited and it grounds for immediate termination of employment or service to the Company.

Any employee who becomes aware of any actual or possible falsification or mistake in the Company's books, records or accounts, or who has reason to believe that a statement has been made that does not comply with the requirements of the preceding paragraph must report it promptly to senior management.

4. Accountability

4.1 Responsibility of Directors

The Board is responsible for monitoring and reviewing the management of the Company to ensure that its operations are conducted in accordance with this Code.

4.2 Responsibilities of Executives

Management is responsible to the Board, for the Company's performance under this Code.

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Dependent on the business structure, the CEO, the heads of each business unit, and the senior managers who report directly to them, have operational responsibility for ensuring compliance with this Code. In meeting this responsibility, they must ensure that each business:

- Promotes a workplace environment that encourages honest and open communication about business conduct issues, emphasises the importance of operating in accordance with this Code, and avoids placing pressure on employees to deviate from these standards.
- Establishes internal reporting and approval processes that address high risk areas in relation to business conduct and ensure that breaches are appropriately investigated and handled.
- Prepares supplementary guidance for employees about how to conduct business in particular markets or countries consistent with this Code.
- Undertakes business conduct awareness training consistent with this Code and tailored to the operational needs of the business.
- Establishes procedures for reviewing the qualifications of its consultants, contractors, partners, etc. before entering agreements with them
- Incorporates the values and policies outlined in this Code in its performance management processes, employment contracts, induction procedures, employee handbooks, industrial agreements and similar systems.

4.3 Responsibilities of Managers and Supervisors

Managers and supervisors must take all reasonable steps to ensure that Pyramid Builders Ltd.'s employees and where appropriate, consultants, contractors and partners, are aware of and comply with this Code. They must consult the next level of management if problems occur. Managers and supervisors must also:

- Ensure that safety in the workplace comes first
- Ensure that all employees have access to appropriate Company policies and procedures
- Respond promptly and seriously to employees' concerns and questions about business conduct issues and seek further assistance if required
- Demonstrate responsible behaviour that other employees can follow

4.4 Responsibilities of all Employees

All employees are expected to be familiar with the contents of, and comply with, this Code. You will not be able to commence employment with the Company until you sign an acknowledgement that you have read, and understand, the contents of the Code. Employers must also have a detailed understanding of Company business practices and policies that relate directly to their job. Employees should seek assistance from their supervisors, managers, or where available, Human Resources department if they do not understand how any part of this Code should be applied.

The Company strongly encourages dialogue among employees and their supervisors regarding situations that give rise to ethical questions and to articulate acceptable ways of handling those situations. In addition, every employee must,

on a periodic basis certify that he or she has read the Code, and to the best of his or her knowledge is in compliance with all of its provisions.

Every employee is obliged to strictly adhere to this Code at all times and under all circumstances. Any employee who is aware of violations or potential violations of this Code has a duty to advise his or her supervisor, manager, HR department.

Further uncertainties regarding legal or ethical issues involving Company affairs requires the employee to seek the advice of senior management. An error in failing to secure advice or report policy violations could be costly to the individuals and to the company. Each employee should also be aware that the legal implications arising from each of his or her acts, as well as everything that he or she writes, may be scrutinized at some future date by government officials or third parties.

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4.5 Effect of Code Violation

Any knowing violation of the laws, regulations or principles of ethics set forth in this Code may result in disciplinary action or dismissal from employment and may subject the employee or former employee to civil liability and/or criminal prosecution under applicable law. Any employee who knowingly authorises or permits another to engage in a violation of this Code will also be subject to disciplinary action, dismissal and other penalties. Those who receive this Code, and the guidelines and policies mentioned herein, and violation of clearly covered areas will be considered “knowing”.

4.6 Protection against Retaliation

The Company strictly prohibits any unlawful discrimination or retaliation against an employee, who in good faith, discloses or reports known or suspected illegal acts by the Company or its agents. Any employee who unlawfully discriminate or retaliates against an employee because the employee, in good faith, disclosed or reported illegal acts will be subject to disciplinary action, including potential termination of employment.

5. Employee Concerns

5.1 Where to go for assistance

If a decision or action appears to be inconsistent with the requirements or intent of this Code or if an employee is unclear about what to do in a specific situation, he or she should raise the issue promptly.

Whenever possible, the employee should first discuss issues with his or her immediate supervisor or manager. If he or she feels unable to do this, there are alternative contacts:

- The next level of management
- His or her HR department
- The manager responsible for the policy area concerned

Persons who have been identified as a source of advice are responsible for promptly responding to employees' questions and concerns regarding business conduct. They must provide accurate information consistent with this Code. All concerns and questions will be treated seriously.

The course of action to resolve a concern will depend on the nature of the issue and its severity. It may be possible to resolve a matter by involving only one person. However, some situations, such as those involving significant legal or financial issues, may require advice and input from additional sources (for example, legal advisers, auditors, etc.). In all cases, confidentiality will be maintained to the highest degree possible.

If information is received regarding an alleged violation of the Code, the receiver will:

- Evaluate such information
- If the alleged violation involves an executive office or a director, inform the Chief Executive Officer and Board of the alleged violation directly
- Determine via senior management whether it is necessary to conduct an informal enquiry or a formal investigation and if so initiate such inquiry or investigation
- Report the results of any such inquiry or investigation, together with a recommendation as to the disposition of the matter and report to the necessary management level

Upon receiving a report of a violation of this Code, the Company, including its legal and other advisors, will have the full power and authority to investigate the report and to determine what steps, if any, should be taken to resolve the

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problem and avoid likelihood of its recurrence. These steps where appropriate include the termination of a person's employment by the Company and the commencement of appropriate legal proceedings.

Employees must, if required, co-operate fully with any investigation concerning a suspected breach of the Code.

6. Business Reporting Requirements

6.1 Reporting of all Fraud Related Issues

Pyramid Builders Ltd personnel must promptly report any suspected violation of this Code related to fraud, misappropriations and any instances of suspected corrupt acts or business transactions, of which they become aware to the most senior management level within the Company.

In all cases where fraud is suspected, employees should not confront the parties involved but should report their concerns as detailed above. Where illegal activities are suspected, management at the appropriate level is responsible for securing all documentary evidence and Company assets, and taking steps to safeguard financial records, including access to computerised networks and systems.

6.2 Reporting of Non-Compliance with this Code

Pyramid Builders Ltd management are required to report all other issues involving serious breaches and instances of non-compliance with this Code to senior management/directors/the Board etc.

Serious breaches include any conduct or event involving impropriety which:

- May have a serious business impact
- May seriously compromise the reputation of the Company

7. Breach of Code

Any individual who breaches this Code or any of the guidelines or policies under it, or who authorises or permits any breaches by a subordinate, will in sufficiently serious circumstances will be subject to disciplinary action including possible dismissal (or in the case of agents, partners, contractors and consultants, termination of their relationship with the Company – whereby this right should be incorporated into contracts with these persons and entities).

The highest standards of corporate conduct are critical to Pyramid Builders Ltd.'s image and success and therefore employees are encouraged to report any actual or suspected breach of this Code.

Any employee who reports in good faith a breach or suspected breach of legal or ethical standards will not be subject to retaliation or retribution or other recriminations for making that report. If an employee believes that he or she will be

punished or has been punished for reporting or supplying information about a genuine concern, the employee should advise his or her supervisor, manager or the senior management team or directors.

If an employee becomes aware of conduct which causes he or she concern, that employee should immediately report the conduct to his or her supervisor, manager, HR department etc. who then has the responsibility to report the matter to their senior management team or address the concern (where there is no higher management level). They will advise the employee of actions that have been taken in a timely fashion.

8. Limitations

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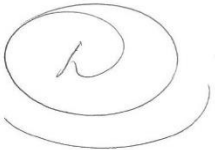
This Code is not a contract and is not intended to impose any contractual obligations on the Company, and does not alter that at-will or other employment relationship between the Company and any employee. In addition, whilst it sets out the basic framework which employees are expected to follow, this Code cannot hope to address the specific, and widely varying, range of legal requirements, cultural and business norms. The Company reserves to itself absolute discretion to adapt or depart from this Code as and when it sees fit, including (without limitation) where this is necessary to ensure that the Company's operations accord with law and business practice. Furthermore the Company does not accept any responsibility or liability to any other person for any part of this Code, or for, or any exercise of, the Company's discretion to adapt or depart from it.

Liam Clear

Managing Director

September 2023

Pyramid Builders Ltd

A handwritten signature in blue ink, appearing to be 'Liam Clear', enclosed within a circular scribble.