Ref	PL/022
Version	5

Ethics Policy

The Universal Group Code of Conduct outlines expected behaviours for all Universal Group employees and subcontractors. Universal Group will conduct its business fairly, impartially, in an ethical and proper manner, and in full compliance with all applicable laws and regulations. In conducting its business, integrity must underline all company relationships, including those with clients, suppliers, communities and among employees. The highest standards of ethical business conduct are required of Universal Group employees in the performance of their company responsibilities. Employees will not engage in conduct or activity that may raise questions as to the company's honesty, impartiality, or reputation or otherwise cause embarrassment to the company.

Employees will ensure that:

- They do not engage in any activity that might create a conflict of interest for the company or for themselves individually.
- They do not take advantage of their Universal Group position to seek personal gain through the inappropriate use of Universal Group or non-public information or abuse of their position. This includes not engaging in insider trading.
- Any/all "gifts" offered to you from suppliers or clients must be immediately identified to your manager or the company directors.
- They will follow all restrictions on use and disclosure of information. This includes following all requirements for protecting Universal Group information and ensuring that non-Universal Group proprietary information is used and disclosed only as authorised by the owner of the information or as otherwise permitted by law.
- They observe that fair dealing is the foundation for all of our transactions and interactions.
- They will protect all company, client, and supplier assets and use them only for appropriate company-approved activities.
- Without exception, they will comply with all applicable laws, rules, and regulations.
- They will promptly report any illegal or unethical conduct to management.
- Every employee has the responsibility to ask questions, seek guidance, and report suspected violations of this Code of Conduct. Retaliation against employees who come forward to raise genuine concerns will not be tolerated.

Signed
Richard Lowe
Managing Director

Dated 01/11/2026