

TRADE PRACTICES POLICY FOR CEMENT AUSTRALIA



Observance of the law

Every person in the Cement Australia group in Australia must comply with the *Competition and Consumer Act 2010* (the Act) and this policy. Anyone breaching the Act faces dismissal. He or she will receive no financial or other support from Cement Australia in meeting the legal costs, penalties, or damages that he or she suffers by breaching the Act, unless he or she has acted in good faith (such as by following reputable legal advice) and it is lawful for the company to provide such assistance.

Anyone who is uncertain about his or her obligations under the Act must obtain and follow the advice of the Cement Australia General Counsel.

If a director, member of the Partnership Management Committee, or manager asks you to breach the Act then he or she is in serious breach of this policy and you must refuse to comply with that request. Every director, member of the Partnership Management Committee, and employee is responsible for his or her compliance with the Act and must be familiar with the requirements of the Act.

Employees

All employees whose position could involve making decisions about dealings with actual or prospective customers, suppliers, or competitors (known as **Trade Practices Relevant Positions**) must:

(Education) read the Cement Australia Fair Competition and Awareness Guide which is located on the company intranet;

(Training)

- in the first month in which they are appointed to that position, undertake the computer-based training course nominated by Cement Australia, and
- thereafter, attend a trade practices workshop and undertake the computer-based training course within the periods nominated by Cement Australia.

(Certification) sign and return a compliance certificate before the end of each February stating whether they have been involved in any breach of the Act, whether they are aware of any employee having been involved in a breach of the Act, and whether they have undertaken the required training during the preceding year.

Reporting and Governance

Group General Counsel sends a monthly email to Executive Members requesting details of any competition law issues which have arisen during the preceding month of which those members are aware, including any action taken. Material competition law issues are reported to the Executive Committee and to the Audit & Compliance Committee of the Board. The Audit & Compliance Committee receives an annual update on compliance with this policy.

Communications with the Australian Competition and Consumer Commission

All communications with the Australian Competition and Consumer Commission (ACCC) must be conducted through the Managing Director or the General Counsel of Cement Australia. You must advise the General Counsel immediately of any contact from the Commission.

A handwritten signature in blue ink, consisting of a series of loops and flourishes, positioned above a horizontal line.

Managing Director