

<p style="text-align: center;">Millbank Holdings Group Ltd (Incorporating Millbank Resource Management Ltd)</p>	
	<p style="text-align: center;">Business Ethics Policy</p>

1 Policy Statement

Millbank Holdings and its subsidiary Millbank Resource Management Limited expects all of its employees and Directors to carry out their business and perform their duties to the highest ethical standards and in compliance with all relevant legal principles. This standard of behaviour and performance is maintained in Millbank Holdings' dealings with employees, customers, suppliers, and all other stakeholders.

2 Scope

This policy applies to all employees regardless of service, contract or position.

3 Responsibilities

Millbank Holdings and its employees will at all times demonstrate the highest levels of integrity, truthfulness, and honesty in order to uphold both personal and corporate reputations and to inspire confidence and trust in their respective actions. Millbank will conduct its business in a competent, fair, impartial, and efficient manner.

Millbank aims to carry out its activities in a responsible and effective manner that takes heed of the interests of all stakeholders. Millbank highly values being a true and trustworthy partner. Safeguarding our good reputation is of paramount importance and, as such, integrity is essential when conducting our business. That applies not only to our clients but also to our employees and all others with whom our company has contact, including our supply chain and competitors. These principles set out the required ethical behaviours for all employees, agency staff and agents when dealing with actual or potential clients, customers, distributors, business contacts, agents, sub-contractors and suppliers, government and public bodies, politicians and political parties. It is the HR Manager's responsibility to ensure these principles and the associated documentation are maintained and adequate reporting and review arrangements are in place.

4 General Principles

4.1 Health and Safety

Millbank Holdings is committed to providing a safe and healthy working environment for all of its employees. There is a programme of regular health and safety audits and safety training. Millbank Holdings applies its standards to all employees and visitors.

4.2 Environment

Millbank Holdings respects the environment and the need to protect it and minimise the impact its operations have on it.

4.3 Customers

Millbank Holdings will take all reasonable care to avoid misleading statements, concealment, and overstatement in all of its advertising and public statements. It will seek to build long term partnerships with its customers by being honest and straightforward in its dealings at all times. It will respect the confidentiality of any information that it might obtain in relation to its customers.

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4.4 Suppliers

Suppliers will be chosen on the basis of factors such as price, quality, delivery, service, and integrity. Millbank Holdings choice of suppliers will be made objectively. Honesty and openness will be paramount in Millbank's dealings with its suppliers.

4.5 Competitors

Millbank Holdings will build its reputation on the basis of its performance alone. It will compete vigorously and lawfully and will not compete unfairly with others. It will not seek to damage the reputation of its competitors either directly or by implication.

4.6 Government, Regulators, and Legislators

Millbank Holdings will seek to comply with all international, national, and local legislation affecting its operations. It will strive to follow the best practice in corporate governance. It will meet its tax obligations. It will not make any financial contributions or offer support to any political party.

4.7 Giving and Receiving Gifts and Entertainment

Employees will neither seek nor accept for themselves or others any gifts, favors, or entertainment without a legitimate purpose from any person or business that does or seeks to do business with, or is a competitor of, Millbank Holdings and its subsidiaries.

5 Policy Review

This policy will be reviewed annually, when circumstances indicate a change is needed or when legislation is introduced that necessitates change.

Signed by:

David Hopley

Title: Managing Director

Date: January 2026

Any personal data collected in line with this policy will be stored and used in line with our Data Protection Policy, Retention Policy and Privacy Notice.