



BUSINESS CONDUCT AND ETHICS

POLICY



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V 1.0 Published 2024

BUSINESS CONDUCT AND ETHICS POLICY

This Policy and Code of Business Conduct and Ethics (the Code) sets out the way the Company conducts business and how we expect our people to behave in the workplace.

The Code is an effective way to guide the behaviour of everyone in the Company by clearly stating the Company's firm commitment to behaving honestly and fairly.

This version of the Code is a summary of important aspects.

Scope:

The Code applies to all the Company people, including all employees, consultants, contractors, and suppliers (the Company People).

All the Company people are required to agree to the principles of the Code, and to show that they have understood and agree to comply with their obligations under this Code.

Business Values:

The Code is grounded in the Company's fundamental values, which derive from our obligations to give proper regard to the interests of people and organisations that have a stake in our activities, including:

- **Workplace Health, Safety Environment** - we care for and protect each other, our business and our environment.
- **Working Together** – we respect and trust each other and achieve more by working together across the Company.

- **Customers** – we listen to our customers to understand and meet their needs.
- **Innovation** – we strive to develop new ideas and continuously improve the way we do business.
- **Results** – together we achieve positive and sustainable results for each other and our stakeholders.

Responsibilities:

It is the responsibility of all the Company people to comply with this Code and to:

- act with integrity – being honest, fair and trustworthy in all business dealings and relationships.
- avoid conflicts between the Company's interests and personal interests.
- protect the Company's business assets.
- respect and abide by our obligations to fellow employees, customers, suppliers and the communities in which we operate; and
- act within the laws and regulations applicable to our business.

It is the responsibility of all the Company people, including managers and other leaders, to ensure ethical conduct is recognised and valued throughout our operations.

We are committed to open and frank communication in the Company workplaces. No Company person will be subject to retaliation by the Company for reporting, on reasonable grounds, a possible violation of this Code.

RESPONSIBILITY TO OTHERS (EEO, ANTI-DISCRIMINATION AND PRIVACY):

The Company is committed to the fair and equal treatment of all its employees and abides by the employment laws of the countries in which it operates. The Company people and candidates for employment shall be judged on the basis of their behaviour and qualifications to carry out their job without regard to race, gender, religion, sexual orientation, disability, age, marital status or political belief or any other aspect protected by law.

The Company does not tolerate discrimination, including sexual, physical or verbal harassment or other demeaning behaviour against any individual or group of people. The Company does not tolerate violence or threats of violence.

The Company's privacy policy is designed to protect privacy of personal information and other rights of individuals in accordance with law. The Company will only acquire personal information that is required to be effective in its business or is required by law.

Refer to the Company Employee Handbook for more information.

ACTING RESPONSIBLY ON WORKPLACE HEALTH, SAFETY AND THE ENVIRONMENT:

In the Company, we regard management of workplace health, safety and the environment (WHSE) as an integral and very important part of our business.

All THE COMPANY people are responsible for reporting safety hazards and work-related accidents and injuries.

There are strict WHSE protocols for contractors as well as for employees to ensure the safety and well-being of all people on the Company sites.

PROTECTING AND SUSTAINING THE ENVIRONMENT:

THE COMPANY is committed to protecting the environment in which we operate by working towards minimising the impact of our activities on it.

GIFTS, GRATUITIES AND ENTERTAINMENT:

We do not give nor take bribes, kickbacks or gratuities or any other payments for favourable treatment or as an inducement for doing business. However, the Company allows the acceptance of token gifts and entertainment provided they are appropriate to the intended business purpose and consistent with local business practice and laws.

Employees should not seek to gain special advantage for the Company or themselves or family members through the use of business gifts, favours or entertainment, if it could create even the appearance of impropriety. Business entertainment should be modestly scaled and clearly for business purposes. Gifts and entertainment should not be offered to a customer or supplier whose organisation does not allow this.

Employees may accept gifts, favours, or entertainment only if they would not create embarrassment, and:

- are a common courtesy associated with normal business relationships;
- are minor in value (under \$250) and cannot in any way be construed as a bribe, pay-off, or business inducement; and
- do not commit any employee, the Company, or any other party to an obligation concerning business.

ACTING RESPONSIBLY WITH CUSTOMERS, SUPPLIERS, COMPETITORS AND OTHERS:

The Company people dealing with customers, suppliers or competitors must fully comply with trade practices laws. If another employee or outside party suggests a breach of these laws this must be immediately reported to the Company Operations Manager.

The Company's success depends on the continued support of our customers. We must act in partnership with our customers for our mutual long-term benefit. We will compete for business openly and honestly. The Company people must not misrepresent our products, services or prices and must not make false claims about those of our competitors.

RESPONSIBILITY TO THE COMMUNITY:

The Company is committed to being a responsible corporate citizen. We recognise our responsibility to deal effectively and appropriately with the communities in which we operate.

We are committed to interacting and building relationships with a number of local community organisations in line with our commitment to operate in a sustainable manner. All the Company people are encouraged to assist in the community and participate in our volunteer programs.

HUMAN RIGHTS:

The Company is committed to upholding human rights. We are committed to identifying any potential or actual adverse impacts of our operations on the human rights of others. Where appropriate we implement prevention, mitigation and remediation processes.

All the Company people are expected to uphold the human rights of others.

Refer to the Company Employee Handbook and Modern Slavery Policy for more information.

COMPLYING WITH THE LAW:

The Company will only conduct business by lawful and ethical means. Legal responsibilities change and employees at all levels must keep themselves informed and comply with all legal responsibilities.

In particular, depending on their individual responsibilities, the Company employees must be familiar with trade practices, taxation, employment or workplace health, safety and environment laws and regulations.

The Company people working in company operations outside Australia must follow local legal requirements, including responsibilities for individual rights, safety, health, the environment and the community.

Penalties for Breaches of the Code:

Adherence to this Code and the Company's policies is a condition of employment at the Company. Breaches of the Code will be subject to disciplinary action including termination of employment, if appropriate. In addition, criminal and civil penalties for individuals may apply for serious breaches.