



Code of Conduct

This Code of Conduct Policy applies to all Employees of the business.

The objective of the policy is to establish clear guidelines and expectations for the behaviour of all employees and stakeholders in the organisation.

The requirement is for all staff to comply with Code of Conduct.

Procedures

- 1) Report Violations/Breaches
- 2) Investigation
- 3) Confidentiality/Non-Retaliation
- 4) Consequences
- 5) Appeals Process

Purpose

Our Code of Conduct policy outlines the expectations and responsibilities of all employees and stakeholders of our organisation. This policy ensures that our business operates with the highest level of ethical standards, compliance with legal and regulatory requirements, and fosters a respectful and inclusive workplace culture.

We are committed to maintaining the highest standards of ethical behaviour, professionalism, and integrity in all our business activities. This Code of Conduct outlines the principles and guidelines that govern the behaviour of our employees. It applies to all employees, officers, directors, and contractors of the company.

Objective

The objective of the policy is:

- To promote ethical behaviour and integrity in all business practices and decision-making processes.
- To maintain compliance with all applicable laws, regulations, and industry standards.
- To create a safe and respectful workplace environment that promotes diversity, inclusion, and equality.
- To establish clear guidelines and expectations for the behaviour of all employees and stakeholders.

Policy Requirements

The standard required from all staff is to adhere to the following:

- **Compliance with laws and regulations:**
All employees and stakeholders must always comply with all applicable laws and regulations. This includes but is not limited to anti-discrimination laws, occupational health and safety laws, privacy laws, and environmental laws.
- **Ethical behaviour:**
All employees and stakeholders must act with honesty, integrity, and in the best interest of the business. Any behaviour that is deemed unethical, including bribery, corruption, fraud, and conflicts of interest, will not be tolerated.

We expect all employees to uphold the highest ethical standards. This includes acting with integrity, honesty, and fairness in all business dealings. Employees should avoid conflicts of interest and disclose any potential conflicts promptly.

- **Respectful behaviour in the workplace:**



Our business values diversity, inclusion, and equality. We are committed to creating a workplace environment that is free from discrimination, harassment, and bullying. All employees and stakeholders must treat each other with respect and dignity. Employees should treat each other with respect, regardless of race, colour, religion, gender, sexual orientation, disability, or any other protected characteristic. Discriminatory or offensive behaviour will not be tolerated.

- **Protection of company assets:**

All employees and stakeholders are responsible for protecting the company's assets, including physical property, intellectual property, and confidential information.

- **Reporting misconduct:**

If an employee or stakeholder becomes aware of any conduct that violates this Code of Conduct policy, they must report it to their supervisor or to the designated compliance officer. Retaliation against anyone who reports misconduct is strictly prohibited.

- **Consequences of violations:**

Any employee or stakeholder who violates this Code of Conduct policy may be subject to disciplinary action, up to and including termination of employment or business relationship.

- **Professional conduct and communication:**

Employees should conduct themselves professionally, both within the company and when representing the company externally. This includes using respectful and appropriate language, maintaining a professional appearance, and adhering to company policies regarding the use of electronic communications and social media.

- **Confidentiality and data protection:**

Employees must respect the confidentiality of proprietary and sensitive information, including customer data and trade secrets. Unauthorised disclosure or misuse of such information is strictly prohibited. Employees should also adhere to applicable data protection and privacy laws.

By adhering to this Code of Conduct policy, we can uphold our commitment to ethical and responsible business practices while fostering a positive workplace culture.

Procedures

Reporting violations and breaches:

- a. Any employee who becomes aware of a suspected violation of the Code of Conduct should promptly report it to their immediate supervisor, manager or Human Resources.
- b. The report should provide specific details about the alleged violation, including the individuals involved, date, time, and any supporting evidence, if available.

Investigation process

- a. Upon receiving a report, the company will initiate a thorough and impartial investigation. The investigation may be conducted by internal personnel or, if necessary, by an external investigator.
- b. The investigation process will include collecting and reviewing relevant information, interviewing involved parties and witnesses, and documenting findings.
- c. The company will strive to complete the investigation in a timely manner, while ensuring a fair and objective process.

Confidentiality and non-retaliation

- a. The company will handle all reports, investigations, and related information with strict confidentiality, to the extent allowed by law and the needs of the investigation.
- b. Retaliation against individuals who report violations in good faith or participate in an investigation is strictly prohibited and will result in disciplinary action.

Determining breaches, violations and consequences

- a. Based on the findings of the investigation, the company will determine if a violation of the Code of Conduct has occurred.
- b. If a violation is substantiated, the appropriate disciplinary action will be taken, taking into consideration the severity of the violation and any mitigating or aggravating factors.
- c. Disciplinary actions may include counselling, written warnings, suspension, demotion, termination, or any other appropriate action deemed necessary.

Appeals process

- a. Employees who are subject to disciplinary actions have the right to appeal the decision. The appeals process should be clearly outlined and allow for a fair and impartial review of the disciplinary action.
- b. Appeals should be submitted in writing, stating the grounds for the appeal and any supporting evidence or arguments.
- c. The company will review the appeal and make a final determination, which will be communicated to the employee in a timely manner.

Communication and training

- a. The company will communicate the Code of Conduct, including reporting procedures and consequences of violations, to all employees. This may be done through employee handbooks, training programs, intranet, or other appropriate means.



- b. Regular training sessions or refresher courses should be conducted to ensure that employees are aware of the Code of Conduct and any updates or changes.
- c. New employees should receive orientation and training on the Code of Conduct as part of their onboarding process.

By establishing clear procedures, the company can ensure that the Code of Conduct is effectively enforced, breaches or violations are appropriately addressed, and employees are aware of their rights and responsibilities.