

CODE OF CONDUCT



1. PURPOSE

Our Code of Conduct sets the standards expected of us all within KLINGER. It provides information to assist in the understanding of the ethical values and standards of behaviour that apply in all of our daily business activities. These are the values and standards on which the Company's reputation is based. Adherence to these values is fundamental to building a partnership of trust between the Company, our employees, our customers and suppliers.

It is a fundamental principle of KLINGER that all of our business affairs shall be conducted legally, ethically and with strict observance of the highest standards of integrity and propriety. This Code of Conduct is based on that principle.

2. SCOPE

This Policy applies to all employees and representatives of KLINGER.

2.1 Work Environment and Culture

The Company will provide a safe, healthy and productive working environment.

Any conduct that is intimidating or offensive to our customers, suppliers, contractors, competitors, the public or other employees will not be condoned.

Employees must commit to fostering a harmonious working environment, this includes;

1. Always being respectful and courteous towards customers, clients, business contacts and colleagues;
2. Not engaging in "gossip", spreading rumours or speaking negatively of others;
3. Working collaboratively within the team;
4. Ensuring open, friendly, respectful and transparent communication with colleagues, customers and clients.

2.2 Occupational Health Safety and Environment

KLINGER is committed to maintaining a safe workplace and protecting the environment. Employees must work in a safe, responsible and effective manner that ensures not only their own safety but the safety of others.

Employees must immediately report to their Manager, any injury or accident no matter how minor. Please refer to Accident Incident Reporting and Investigation Policy for more information.

2.3 Business Dress and Personal Protective Equipment (PPE)

Each employee has a responsibility to achieve quality in all aspects of his/her role with the Company. This will contribute to the Company meeting and exceeding the customers' expectations.

During working hours, employees are requested to be well groomed and dress in a manner appropriate to a business environment. From time to time, there may be occasions where employees are permitted to dress in a more casual fashion.

Employees are expected to wear the appropriate Personal Protective Equipment (PPE) as required. Please refer to the Dress Code, Uniform and PPE Policy for further information.

2.4 Fitness for Work

Employees are required to be in a suitable condition to carry out their duties, regardless of whether they are working normal hours or overtime. If an employee is not fit for duties, the employee must notify their Manager immediately.

An employee who arrives at work under the influence of alcohol or drugs is considered unfit for work.

Managers/Supervisors will consult with any person whom they suspect may be unfit for work. Where necessary, they will make arrangements to ensure the employee returns home without risk to themselves or others.

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An employee who is required to take prescribed medication that may affect their ability to perform their normal duties must notify their Manager. The employee may be asked to provide confirmation from their medical practitioner of the prescribed medication/s and whether the employee is fit to perform normal duties whilst taking the medication/s.

Continuing instances of presenting at work in an unfit condition will result in appropriate disciplinary action. Please refer to the Fitness for Work and Drug and Alcohol Policy for further information.

2.5 Smoking/Vaping

The Company has adopted a clean air policy. As such, smoking is not permitted anywhere, at any time, within the precincts of or the main entrances to its buildings including factories, Company vehicles or plant equipment.

A designated area (Guy Park) has been allocated for smoking/vaping. Smoking/vaping is only permitted during allocated breaks.

2.6 Flexibility

The Company acknowledges that employees need to be able to achieve an effective balance between their work and outside-work commitments. Outside-work commitments may include family and carer responsibilities, further education, and involvement in various community organisations and activities. Please refer to the Flexible Working Arrangements Policy.

2.7 Workplace Behaviour

Under the Harassment, Discrimination and Bullying Policy; and Diversity, Equity and Inclusion Policy (which replaces the EEO Policy), the Company is committed to providing all employees with an inclusive workplace which embraces diversity and free from harassment, discrimination and bullying.

Discrimination or harassment based on race, colour, religion, gender, age, marital status, disability, sexual preference or other factors will not be tolerated.

All employees are entitled to their personal preferences in private or political matters. No pressure should be placed on anyone to influence those preferences and no approval or disapproval should be shown by anyone in their role with the Company, of anybody's private or political preferences or activities.

Bullying and harassment will not be tolerated in the workplace. Please refer to Harassment, Discrimination and Bullying policy for further details.

2.8 Non-Use of Child Labour

The Company is committed to the principles of protecting children from child labour exploitation, and believes that their future development and that of the communities and countries in which they live is best served through education, not child labour.

The Company will comply with all relevant and applicable local and international labour regulations, treaties, conventions and principles relating to the protection, welfare and health and safety of children.

Furthermore, the Company will not employ any person deemed by local or international laws, conventions or regulations to be a child in any capacity in any industrial operation under its control.

2.9 Personal Conduct

Every employee's personal conduct should be fully consistent with this Code. Employees should deal fairly and honestly with each other, our customers, suppliers and competitors.

All customer contacts should be handled professionally and courteously.

Employees should at all times act in a responsible manner at Company sponsored functions or when representing the Company at an external function.

Subject to taking authorised leave, all employees must arrive at the workplace on time and stay until the designated finishing time. Employees must also be punctual when taking lunch or other breaks.

Employees should report to work as required and when an absence is unavoidable, promptly notify the appropriate person of the reason for and potential duration of the absence.

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2.10 Intellectual Property

Intellectual property means all intellectual property and proprietary rights (whether registered or unregistered) that are owned or used by KLINGER or necessary for the conduct of KLINGER's business including:

- 1) any KLINGER confidential information; and
- 2) any patents, copyright (including all copyright software), registered designs, trademarks, rights to have information kept confidential, processes, inventions, improvements, innovations, modifications and discoveries, whether or not capable of being secured, registered or protected by any means.

Employees must deliver to KLINGER full particulars concerning the realisation or creation or arising from the development of any new Intellectual Property.

Employees must, with the approval of, and at the expense of KLINGER, execute all documents and undertake all such acts, matters and things as may be reasonably necessary to obtain registration or other legal protection of the Intellectual Property on behalf of Client Name and to give effect to the assignment above.

Employees must maintain dated, legible records of all work performed in the study, assessment or development of the Intellectual Property and acknowledge that all such records are the property of KLINGER.

2.11 Company Assets

On leaving the Company each employee must surrender any Company assets, e.g. credit cards, documents, project documentation, customer lists, supplier lists, policy and procedure manuals, and items containing business information. This includes intellectual property that may have been created whilst working with the Company. This is not practicable to fully define, however it would include such things as products, patents and even systems and plans developed in the course of the employee's employment at the Company.

Company property and merchandise is not to be removed from Company premises without authorisation. This includes any samples of merchandise received. If, for business reasons, removal is necessary, then approval must be obtained from your immediate supervisor.

2.12 Non-Business Activity

As a responsible and caring corporate citizen, the Company encourages its employees to participate in professional associations, trade associations, charitable or service organisations and other community activities. The Company also recognises that employees may from time to time wish to participate in political activity and/or serve in public office. Such activities will not generally create difficulties but the following points should be considered:

- 1) Employees should ensure that where any non-business activity is likely to involve a substantial commitment of time, it does not impact on their ability to satisfactorily perform their assigned work for the Company.
- 2) If outside activities adversely affect an employee's work performance, he or she may need to consider modifying the activity.
- 3) Where the outside activity involves service as a member of local government or other political activity, there should be no specific or implied Company endorsement of such activity.
- 4) Where employees wish to speak at a public function, or write an article in their own right, but not as a representative of the Company, such activity is permissible provided that:
 - Company information is not divulged;
 - Company name/s or logo/s do not appear (unless permission has been obtained from the Managing Director).
 - Where necessary, employees clearly indicate that they are not speaking or writing as representatives of the Company.

2.13 Confidentiality

All information relating to Company business obtained by employees in the course of their employment is to be considered confidential unless the Company has officially made the information public. Due to the highly competitive nature of our industry, it is expected that all employees will treat information pertaining to the Company's products, services and processes with confidence and display appropriate loyalty to the Company.

Any employee who is uncertain whether something is confidential should presume that it is. While it is not practicable to exhaustively define the term, "information" includes:

- 1) Documents which are prepared for internal use no matter how generated, formal or informal, and whether stored in printed form or electronically;
- 2) Commercially sensitive documents relating to services, products or merchandising;
- 3) Personnel records and other information regarding internal procedures, processes and systems;
- 4) Information obtained verbally whether in formal meetings, during discussions or in any other way.

In light of the sensitivity of information that some employees will be involved in due to the nature of their role, formal Confidentiality Agreements may be a condition of employment. Where this is the case, at induction the employee will be required to sign a Confidentiality Agreement.

2.14 Information Management

Unauthorised disclosure of Company information, including the misuse of intellectual property belonging to the Company is prohibited. Providing competitors or other unauthorised persons with technical, photographic or other information, which may adversely affect the Company's competitive advantage, may result in disciplinary action, up to and including termination of employment.

Please refer to the Information Technology and Social Media Policy.

2.15 Media

All requests for interview, comment or opinion from a representative of any branch of the media must immediately be referred to Managing Director. No KLINGER employee is permitted to make comment to any media representative without the prior consent of the Managing Director.

2.16 KLINGER Business Partners/Relationships, Competitors & Suppliers, Customer Service

Employees will deliver exceptional value and service to our customers by conducting themselves with integrity and in a manner that ensures:

- 1) Our internal and external customers are provided with the products and services they want of the highest possible quality, with due regard to time and cost parameters;
- 2) All decisions and actions are evaluated in terms of their impact on customers;
- 3) There is a safe and friendly environment at all times for our employees and customers.

2.17 Contract Negotiations

In negotiating contracts, employees are required to be accurate and complete in all representations. The submission to a customer of a proposal, quotation or other document or statement that is false, incomplete, or misleading can result in civil and/or criminal liability for the Company and the involved employee/s who engage in or condone such a practice. In negotiating contracts we will comply with all contractual requirements in a fair, honest and ethical manner.

2.18 Inside Trading

Employees who may consider themselves to be in possession of share price sensitive information concerning publicly listed companies, must make themselves familiar with the law governing "insider trading" and related issues.

Employees may not trade in the securities of any other Company, or buy or sell any property or assets, on the basis of non-public information acquired through employment at KLINGER, whether such

information comes from the Company or from another Company with which KLINGER has a confidential relationship.

2.19 Fees & Commissions

Commission or fee arrangements should only be made with companies, firms or individuals serving as bona fide commercial representatives, agents or consultants. Enquiries should be made to ensure that such arrangements are not entered into with any Company or firm in which a government official or employee is known to have an interest unless the arrangement is permitted by law and has been specifically approved by the relevant Manager. All commission and fee arrangements should be by written contract. Fees are to be reasonable and consistent with normal practice for the industry, the merchandise involved and the services rendered. Payments should not be made in cash.

Please ensure that the correct Commercial and Risk Process has been complied with in respect to engagement of agents or consultants.

2.20 Business Records (Fraud, Corruption & Irregular Transactions)

Employees must not destroy business documents or records that are required by law to be maintained for a statutory period, nor must any records be falsified or manipulated.

Employees must not engage in any unethical or improper payment practices either to obtain business or for personal gain. In particular they must not:

- 1) Engage in commercial bribery;
- 2) Be party to the bribery of public officials;
- 3) Establish or participate in so-called "slush funds" to facilitate bribery or other improper or questionable practices.

Employees who believe they know of any fraud, corruption, irregular transactions or breach of ethics have a duty to raise the matter with their immediate supervisor or to communicate their concerns to the Managing Director.

As part of its obligations under law, the Company will fully co-operate with any investigation by law enforcement or regulatory authorities. It will also require that employees:

- 1) Do not make any disbursement of Company funds or other Company property without adequate supporting documentation. This includes ensuring that all appropriate payment authorisations are obtained in accordance with delegated authorities. There shall be no disbursement for any purpose other than as described in the documents;
- 2) Do not, in furtherance of Company business, make any direct or indirect personal payments to companies or officials or employees of any government at any level by Company accounts excluding payments of expenses, which are later reimbursed to the Company;
- 3) Do not take any action or authorise any action which involves illegal, unethical or otherwise improper payment of money or anything else of value;
- 4) Do not undercharge or overcharge customers;
- 5) Do not falsify or deliberately make inaccurate or misleading entries in Company books and records. All Company expenditures must be correctly recorded in accordance with generally accepted accounting principles.

2.21 Conflict of Interest

Employees having knowledge of commercially sensitive information and having a significant vested interest in a competitor of the Company must disclose that interest. Where, in the opinion of the employee's immediate supervisor, the interest constitutes a conflict of interest, those employees should divest themselves of that interest.

Employees may own shares or other interests in any public or private company. In most cases these interests will not present a problem. However, employees should carefully assess the potential for a conflict of interest where they, their partners, or other relatives' own shares or other interests in a

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Company or firm that is a trade customer of, supplier to, or competitor of the Company. If a potential conflict of interest appears to exist, then the facts of the matter should be disclosed to the employee's immediate supervisor.

An example of unacceptable conflict would be where the employee's interests in another Company impinge upon working hours or unreasonably interfere with the employee's employment with the Company.

Employees may not engage in employment outside of their employment with the Company without the approval of the Managing Director. This extends to a Company employee providing services on a consulting or contract basis or any basis on which the employee has a financial interest, and applies whether the provision of such services is full-time, part-time, casual or ad hoc and for remuneration or gratis.

Full-time employees who propose to engage in outside business activities should assess those activities in terms of the following guidelines to determine whether a conflict exists with their Company business commitments:

2.21.1 Outside Business Activities

Where an employee's participation in outside business activities interferes with his/her ability to satisfactorily perform assigned work for the Company, a conflict of interest will arise.

Where an employee, having knowledge of commercially sensitive information, actively participates in outside business activities for a competitor of the Company, a potential conflict of interest may arise.

No employee who has knowledge of commercially sensitive information shall engage in any outside business activity for a supplier of the Company without first obtaining written approval from their immediate supervisor.

Any employee who actively participates in business activity for an outside Company may not render service to the Company on that Company's behalf.

A potential conflict of interest may arise due to the business activities of an employee's partner, relatives or associates.

An employee has a potential conflict of interest whenever a partner, relative or associate has a significant interest in a transaction with the Company or a significant relationship with any competitor or supplier.

Employees should not make or influence any decision which could directly or indirectly benefit a partner, relative or associate. In order to protect all parties for the potential for, or appearance of, a conflict of interest, appropriate disclosures should be made to the relevant Manager.

Employees having knowledge of commercially sensitive information and having a significant vested interest in a competitor of the Company must disclose that interest. Where, in the opinion of the employee's immediate supervisor, the interest constitutes a conflict of interest, those employees should divest themselves of that interest.

2.21.2 Gifts, Entertainment & Services

Employees who accept gifts, entertainment and gratuities or any other direct or indirect personal benefit from or through any person or concern which has business, seeks to have business or competes with the Company must use extreme caution to ensure against any possible impropriety, alleged offence or embarrassment to the Company.

Employees should not accept gifts from a competitor or from anyone having or seeking business with the Company other than non-cash gifts of up to the value of \$100 without the written authority of their Manager. Any such gifts must be considered in the context of the business relationship between the donor and the Company. If gifts are valued in excess of \$100, as the Company is sensitive to the cultures of other countries, the Finance Manager is to be notified and the gift recorded in the gift register.

Participating in business-related functions, including accepting lunches or other meals with a supplier or competitor is a permissible business practice only with the approval of the employee's Manager.

However, care should be exercised to ensure these functions have an underlying business purpose and that their value and frequency are not excessive.

Particular care should be exercised in ensuring that any function falls within the limits of socially acceptable behaviour and that the employee's presence does not reflect negatively on the Company.

Employees should not enter into any loans or receive or purchase any goods or services from any supplier on terms that are more favourable than those available in the normal course of private business without prior approval from his/her Manager or the Managing Director or Finance Director.

Where any doubt exists regarding the acceptance of any gift, entertainment, goods or service, advice should be obtained from the employee's immediate supervisor.

2.22 Relevant legislation

The following list of legislation is not exhaustive:

- Crimes Act 1914
- Australian Human Rights Commission Act 1986
- Workplace Gender Equality Act 2012
- Disability Discrimination Act 1992
- Fair Work Act 2009
- Racial Hatred Act 1995
- Copyright Act 1968
- Age Discrimination Act 2004
- Work Health and Safety Act 2020 (WA)
- Work Health and Safety (General) Regulations 2022 (WA)
- Vic Occupational Safety and Health Act 2004
- Vic Occupational Health and Safety Regulations 2017
- Qld Workplace Health and Safety Act 2011
- Qld Workplace Health and Safety Regulations 2014
- NSW Work Health and Safety Act 2011
- NSW Work Health & Safety Regulation 2017
- SA Work Health and Safety Act 2012
- SA Work Health and Safety Regulations 2012
- NZ Health and Safety at Work Act 2015
- NZ Health and Safety at Work Regulations 2016

3. CONSEQUENCES OF BREACH OF THIS POLICY

Non adherence to this Policy can lead to disciplinary action up to and including termination of employment. For any interpretation or clarification of legal or regulatory requirements consult your Manager/Supervisor.

If you believe that another employee is breaching the KLINGER Code of Conduct as set out in this policy document, you must bring it to the attention of your Manager or the Managing Director. You are assured that you can discuss other employee's behaviour with no fear of risk or reprisal against you.

4. REVIEW

This Policy and its implementation will be reviewed on an ongoing basis in terms of its suitability and effectiveness. Internal control systems and procedures will be audited regularly to ensure that they are effective in minimising the risk of non-compliance with this Policy.

This Policy shall be reviewed annually to ensure that it remains current and relevant to KLINGER standards of practice.

All employees are required to understand and comply with this Policy and to follow the requirements set out in this Policy.