

1 Purpose and scope

This Code of Conduct of AustOn Corporation Pty Ltd together with its managed entities (**AustOn Group**) sets out the compliance and integrity standards expected of our People and how to report non-compliance. It applies to all employees, directors, officers and contractors of AustOn Group, and any third parties engaged by us (collectively **People**).

The Code does not cover every possible situation that we may face, nor describe every law, policy or standard with which we need to comply. Rather it provides a framework that we should use as a basis for making common-sense, lawful and ethical decisions that protect the interests of AustOn Group, its stakeholders and its employees.

For avoidance of doubt, this Code does not form part of the terms and conditions of any contract between AustOn Group and our People. AustOn Group's compliance with this Code does not affect any obligations owed by AustOn Group under those contracts. Nothing in this Code prevents AustOn Group from acting in relation to any misconduct or alleged misconduct committed by our People.

2 Detailed code

2.1 We respect communities, environment & rights of individuals

AustOn Group is committed to achieving and maintaining a reputation as an employer of choice, an ethical business partner and a good corporate citizen. This means we respect the law. We ensure workplaces are built around wellbeing, equity and trust and always ensure we have a 'social license to operate' through open communication and fair dealings with communities.

AustOn Group's key focus is to provide and maintain a safe and healthy work environment for all people in our workplaces. All People working on our sites, are expected to be aware of and comply with all health and safety requirements associated with their jobs and notify their superior of any safety lapses.

Our people must present to work free of illness, fatigue, alcohol and/or performance impairing drugs, and any other cause of impairment that could affect their ability to work safely. We must participate in the company's "Fitness for Work" monitoring programmes as directed. Compliance with AustOn Group's [Drug and Alcohol Policy](#) forms part of this Code.

We provide equal opportunities of employment strictly based on merit and performance. Compliance with AustOn Group's [Workplace Behaviour Policy](#) forms part of this Code.

We believe that there is no room for any form of harassment. AustOn Group expects all our people to demonstrate and promote professional behaviour and treat others respectfully.

Access to personal records of employees is limited to authorised personnel and on a strict "need to know" basis. Compliance with AustOn Group's [Privacy Policy](#) forms part of this Code.

We focus on creating and sustaining landscapes where prosperous farming, thriving rural communities and healthy ecosystems can coexist.

We implement responsible sourcing, including eliminating unacceptable practices in land management and implement

environmentally sustainable practices, where feasible.

You should look for ways to reduce or eliminate actions with negative environmental impacts and notify management of potential environmental concerns.

2.2 We individually & collectively uphold the law and the Code

Knowing the Code of Conduct and how to apply it, along with all other AustOn Group policies, is the responsibility of all our people. Each one of us is accountable for upholding the Code.

If you find yourself in a situation where there is a difference between this Code and any law, regulation or rule, you must comply with the law or regulation where they are stricter than this Code. Please contact our Company Secretary for guidance, if required.

Compliance with the Code of Conduct also applies to 3rd parties engaged by you or your team. It is your responsibility to ensure contractors do not engage in unethical behaviour when acting on AustOn Group's behalf.

We respect the intellectual property rights of third parties and copyrighted software.

2.3 We put integrity & fair play at the heart of all relationships

You should not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of facts or any unfair-dealing practice.

All employees, but especially those who are in regular contact with competitors, have a responsibility to ensure that they are familiar with applicable competition laws. Examples of anti-competitive behaviours can include discussing sales, prices and volumes as this can lead to allegations of price fixing.

We are honest with all authorities and law enforcement agencies. Where the law is unclear or conflicting, you should discuss the situation with your line manager or our Company Secretary.

Should you be contacted by a government agency regarding any investigation, search, statutory action or on matters beyond your scope of work, you are to promptly notify your line manager and the Company Secretary for instructions.

AustOn Group has a zero-tolerance culture for any forms of bribery and/or corruption, even if it is considered to be local practice. This is reinforced by the AustOn Group and OTPP's [Anti-bribery and Anti-corruption Policies](#).

To avoid being in a situation where a 3rd party could try to elicit a bribe, you should:

- ensure all 3rd parties that you deal with are aware of, and acknowledge, AustOn Group's zero tolerance to bribery, fraud and corruption before entering into new relationships with them and include appropriate terms in any contracts
- carry out appropriate due diligence on third parties before you enter into a deal or relationship; be alert for any suppliers with poor practices or close relationships in the supply chain (e.g. distributor) or with government officials
- seek a breakdown of all fees upfront and question anything which appears unusual
- maintain complete and accurate records of all business transactions and dealings entered into on behalf of or in connection with AustOn Group.

2.4 We protect AustOn Group's assets – intellectual, physical, financial, & reputational – in a legal and ethical manner

All employees must only use AustOn Group's computing, software, communications and network resources and facilities owned and controlled by AustOn Corp for appropriate work-related activities. This is reinforced by the [IT and Email Conditions of Use Policy](#).

To the extent permitted under applicable law, AustOn Group reserves the right to monitor and inspect all communication, email, data and files kept on AustOn Group's network or equipment to safeguard AustOn Group's assets (both physical and intangible).

Only the Managing Director or specifically authorised individuals are permitted to represent AustOn Group with the media or publicly.

Employees participating in outside speaking engagements as a result of their position with AustOn Group must obtain prior permission from a member of Executive Leadership Team, in the case of Directors, the Chair and Managing Director should be consulted.

3 Reporting under the Code

Everyone is expected to speak up against any suspected or actual breach of the Code of Conduct, the Law or AustOn Group's compliance and integrity standards. You should report instances of non-compliance to your immediate supervisor, the Company Secretary or through the [Whistleblower Policy](#).

The AustOn Group [Whistleblower Policy](#) maintains a simple communication channel that can be used anonymously to report:

- any action that breaches this Code, policy of AustOn Group or law, rule, or regulation
- acts of misconduct (which includes fraud, negligence, default, breach of trust, breach of duty).

We treat all reports of misconduct seriously and deal with these as promptly, fairly, and confidentially as possible. The [Whistleblower Policy](#) also sets out AustOn Group's position on employee protection against any form of retaliation.

We will not tolerate threats or retaliation against employees who raise and report concerns. If any employee suspects that they are being targeted or have actions taken against them in retaliation for raising a compliance or integrity issue, they should immediately report such suspicions using the reporting channels in the [Whistleblower Policy](#).

4 Breaches of the Code

Disciplinary action will be taken where there is a breach of the Code of Conduct. The nature of the disciplinary action will depend on the severity of the breach. Where criminal activity may have occurred, such instances will be reported to the appropriate law enforcement agency.

Disciplinary action will also be taken against anyone who approves a violation of the Code of Conduct by another person, or who is aware of a violation by another person and, without good reason, fails to take appropriate action.

If any applicable laws or regulations are contravened this may also result in prosecution by the appropriate authorities. AustOn Group will not pay any penalties imposed upon directors, employees, contractors, suppliers or business partners as a result of them breaching any applicable laws or regulations where the liability arises because they failed to act in good faith.

In the event that any of our contractors, suppliers or business partners is unable to meet the standards required by this Code of Conduct, we will encourage them to make the necessary changes in order to comply with the Code and we reserve the right to terminate our business activities with them at our absolute discretion.

5 Revision history

#	Author	Revision Notes	Approved	Date
1	AustOn Corp	New policy	Board	25-Feb-2020
2	AustOn Corp	New procedure format adopted	Board	18-May-2021
3	AustOn Corp	Annual review	Man't.	9-Dec-2021
4	AustOn Corp	Biennial review	Man't.	1-Jul-2024