



CODE OF CONDUCT POLICY

Rev No. 8. 3/5/2023
Code of Conduct Policy P180-1-01

PURPOSE

The purpose of this Code of Conduct (the Code) is to provide you with a clear understanding of the standard of conduct expected when performing your duties as a team member of the Aeroklas Asia Pacific Group.

The Aeroklas Asia Pacific Group expects that all team members will conduct themselves in such a way that is respectful, friendly, professional, and collaborative and not offensive or derogatory in any way.

The Code places an obligation on all team members to take responsibility for their own conduct. To achieve this, all team members of the Aeroklas Asia Pacific Group are expected to familiarise themselves with and act in accordance with this Code.

FRAMEWORK FOR ETHICAL CONDUCT

The Code does not attempt to provide an exhaustive list of what to do in all situations, instead the Code represents a broad framework of ethical conduct that you have an obligation to uphold.

The Code also provides the basis for disciplinary action for those who fail to meet their obligations.

The standards of conduct in the Code are based on four ethics principles, which are considered essential for the performance of duties by any team member a part of the Aeroklas Asia Pacific Group:

- integrity and impartiality;
- promoting the company in a positive way;
- commitment to complying with laws, policies and procedures and company guidelines;
- accountability and transparency.

The Code was developed in consultation with team members and those organisations that represent their interests. Through this consultative approach, a Code of Conduct was developed to reflect the operational needs of the Aeroklas Asia Pacific Group and provides a basis for high standards of ethical conduct in the way you do your work.

APPLICATION OF THE CODE

The Code applies to all team members whether they are permanent, temporary (full-time or part-time), agency supplied temporary staff, casual or a contractor.

In applying the Code, you are to consider both the 'spirit' and 'content' of the Code. If you are in any doubt as to the meaning of the Code or its application in any given situation, you should seek advice from your manager.

As a team member of the Aeroklas Asia Pacific Group, you have a responsibility to conduct yourself in a manner that will not undermine public confidence in the integrity of the Aeroklas Asia Pacific Group.

Team members who have human/financial management accountabilities (i.e. managers or team leaders) have the responsibility of monitoring the use of the Aeroklas Asia Pacific Group resources and the performance of team members. Managers are also responsible for taking the appropriate action where a team member breaches the Code of Conduct.

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YOUR OBLIGATION UNDER THE CODE

The Code sets out your obligations in relation to each of the four ethics principles. The practical application of each principle involves you in meeting an obligation to apply a standard of conduct which is wholly consistent with the 'spirit' and 'intent' of the principle. It is important to remember that there may be situations where you will be called upon to demonstrate sound judgement in the application of the Code to ensure the company's best interests are met.

PRINCIPLE 1: INTEGRITY AND IMPARTIALITY

Ethics obligation

As Aeroklas Asia Pacific Group team members, we should seek to promote confidence in the integrity of the company and should:

- be committed to the highest ethical standard;
- provide advice which is objective, independent and impartial;
- show respect towards all persons, including team members, suppliers, customers and the general public;
- acknowledge the primacy of the company's interests and undertake that any conflict of interest issue will be resolved or appropriately managed in favour of the company's interests; and
- be committed to honest, fair and respectful engagement with others

Required standards of conduct

1.1 Commit to the highest ethical standards

As Aeroklas Asia Pacific Group team members, we are required to ensure that our conduct meets the highest ethical standards when we are fulfilling our responsibilities. We will:

- ensure any advice **that we provide is objective, independent and impartial;**
- **ensure our decision making is ethical;**
- engage with third parties in a manner that is consultative, respectful and fair; and
- meet our obligations to report suspected wrongdoing, including conduct not consistent with this Code

1.2 Manage conflicts of interest

A conflict of interest involves a conflict between our duty, as Aeroklas Asia Pacific Group team members, to serve the company's interests and our personal interests. The conflict may arise from a range of factors including our personal relationships, our employment outside the Aeroklas Asia Pacific Group, our membership of special interest groups, or our ownership of shares, companies, or property.

As Aeroklas Asia Pacific Group team members, we may also experience conflicts of interest between our company's ethics and our professional codes of ethics (for example, as accountants or lawyers), or with our personal beliefs or opinions.

Having a conflict of interest is not unusual and it is not wrongdoing in itself. However, by failing to disclose and manage the conflict appropriately is likely to be wrongdoing.

As Aeroklas Asia Pacific Group team members, we are committed to demonstrating our impartiality and integrity in fulfilling our responsibilities and, as such, we will:

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- always disclose a personal interest that could, now or in the future, be seen as influencing the performance of our duties;
- actively participate in developing and implementing resolution strategies for any conflict of interest; and
- ensure that any conflict of interest is resolved in the public interest

1.3 Contribute to public discussion in an appropriate manner

Commenting on the Aeroklas Asia Pacific Group policy is a matter for the Managing Director or the Chief Executive Officer, not team members. Unless prior authorisation has been given, we will not comment to the media on the Aeroklas Asia Pacific Group's policies.

Where providing factual information to the public on the Aeroklas Asia Pacific Group's policies is a part of our duties and responsibilities, we will ensure that information is appropriately authorised, and that we properly represent Aeroklas Asia Pacific Group policy in its intended manner and spirit.

Like any other citizen, we have the right to contribute to public discussions on community and social issues in our private capacity (such as on social media). In doing so, we will:

- take reasonable steps to ensure that any comment we make will be understood as representing our personal views, not those of the Aeroklas Asia Pacific Group;
- maintain the confidentiality of information we have access to due to our roles, that is not publicly available; and;
- be aware that personal comments about a public issue may compromise our capacity to perform the duties of our role in an independent, unbiased manner

1.4 Manage participation in external organisations

Our work as an Aeroklas Asia Pacific Group team member does not remove our right to be active privately in a political party, professional organisation or trade union. As a member of a political party, however, we are aware that participating in activities in the public arena, where we may be identified as an Aeroklas Asia Pacific Group team member, can give rise to a perception of conflict of interest (see section 1.2). Where this situation arises, we will declare and manage our activities in accordance with Aeroklas Asia Pacific Group's policies. If we are elected as workplace representatives or officials of a trade union or professional association, we are not required to seek permission from our workplace before speaking publicly in that capacity, and we will make it clear that our comments are made only on behalf of that organisation. In all instances, we will comply with the appropriate laws of privacy, confidentiality, and information management.

1.5 Demonstrate a high standard of workplace behaviour and personal conduct

We have a responsibility to always conduct and present ourselves in a professional manner, and demonstrate respect for all persons, whether fellow team members, customers/suppliers or members of the public. We will:

- treat co-workers, customers/suppliers and members of the public with courtesy and respect, be appropriate in our relationships with them, and recognise that others have the right to hold views which may differ from our own;
- ensure our conduct reflects our commitment to a workplace that is inclusive and free from harassment;

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- ensure our fitness for duty, and the safety, health and welfare of ourselves and others in the workplace, whether co-workers or customers/suppliers;
- ensure our private conduct maintains the integrity of the Aeroklas Asia Pacific Group and our ability to perform our duties; and
- comply with legislative and/or policy obligations to report employee criminal charges and convictions

PRINCIPLE 2: PROMOTING THE COMPANY IN A POSITIVE WAY

Ethics obligation

Aeroklas Asia Pacific Group team members should recognise that we are responsible for ensuring that our actions reflect positively on the company. Through this role, we accept and value our duty to:

- be responsive to both requirements of the Aeroklas Asia Pacific Group and its Group Leadership Team;
- manage the company's resources effectively, efficiently and economically; and
- achieve excellence in service delivery

Required standards of conduct

2.1 Commit to excellence in service delivery

We have a responsibility to:

- act fairly, courteously, effectively, and ensure we use company resources efficiently and economically; and
- treat complaints from customers/suppliers and respond to constructive feedback as an opportunity for improvement

2.2 Ensure appropriate engagement

We have a responsibility, where appropriate and in accordance with our duties, to listen and respond to issues and concerns raised by individuals or customers/suppliers.

PRINCIPLE 4: COMMITMENT TO LAWS, POLICIES AND PROCEDURES, COMPANY GUIDELINES

Ethics obligation

An Aeroklas Asia Pacific Group team member should recognise that we have a duty to uphold the laws of the state, Commonwealth and local government, as well as Aeroklas Asia Pacific Group policies and procedures and company guidelines, and:

- accept and value their duty to uphold the laws of the State, the Commonwealth and local government; and
- accept and value their duty to operate within the Aeroklas Asia Pacific Group framework

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Required standards of conduct

3.1 Commit to our roles

Our role is to undertake our duties, and to give effect to the policies of the Aeroklas Asia Pacific Group. We will:

- accept that the Executive Team and Group Leadership Team have the right to determine policy and priorities;
- be responsive to those policies and priorities and then to implement them professionally and impartially;
- comply with the laws of State, Australian and local governments;
- comply with all relevant awards, certified agreements, subsidiary agreements, directives, whole-of-government policies and standards; and
- adhere to the Aeroklas Asia Pacific Group's policies, procedures, organisational values and organisational documents

PRINCIPLE 4: ACCOUNTABILITY AND TRANSPARENCY

Ethics Obligation

Aeroklas Asia Pacific Group team members should recognise that trust in team members requires high standards. As a result, team members must:

- be committed to exercising proper diligence, care and attention;
- be committed to using company resources in an effective and accountable way;
- be committed to managing information within the legal framework;
- value and seek to achieve high standards of individual performance; and
- value and seek to innovate and continuously improve performance

Required standards of conduct

4.1 Ensure diligence in public administration

We have an obligation to seek to achieve high standards and perform our duties to the best of our abilities. We will:

- apply due care in our work;
- treat all people equitably and consistently;
- exercise our authority with care and for the purpose for which these were granted; and
- comply with all reasonable and lawful instructions, whether or not we personally agree with a given policy direction

4.2 Ensure transparency in our business dealings

In order to ensure all Aeroklas Asia Pacific Group dealings are conducted with the highest level of integrity we will ensure:

- any engagement we have with political lobbyists is properly recorded; and;
- we manage gifts, benefits or hospitality in accordance with Aeroklas Asia Pacific Group policies

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4.3 Ensure appropriate use of company resources and facilities

We are accountable for all resources that we use in the course of our duties. We will:

- be economical, and avoid waste and extravagance in the use of company resources for proper purposes;
- use any company resource in accordance with Aeroklas Asia Pacific Group policies;
- purchase, manage and care for company resources in accordance with Aeroklas Asia Pacific Group policies; and
- responsibly utilise human assets such as corporate knowledge and intellectual property, as resources

4.4 Ensure appropriate use and disclosure of personal information

Information privacy legislation protects against the misuse of personal information and we have an obligation to ensure the lawful collection and handling of personal information. In addition, we will:

- treat personal information with care and use it only for the purpose for which it was collected or authorised;
- store personal information securely, and limit access to those persons requiring it for legitimate purposes; and
- not use personal information to further a team member's personal interests

4.5 Commit to innovation and continuous performance improvement

The capacity of the Aeroklas Asia Pacific Group to deliver cutting edge 4WD products, OE and Aftermarket accessories and fitting services relies on a commitment to continuously improve our performance. We each have a responsibility, having regard to our own roles, to:

- maintain and develop our professional skills and knowledge;
- in consultation with our managers, take reasonable steps to identify and apply for development opportunities relevant to our current roles and responsibilities;
- actively participate in employee performance management processes, including induction, performance planning and development; and
- actively contribute to developing and improving business planning and processes, including innovative ways of delivering products and providing services

A guide for ethical decision making

The guide below gives some things to consider in light of your obligations under the Code. It will not make the decision for you, but it will help you to analyse all the relevant facts and circumstances of a situation to reach a decision.

Step 1. Identify and assess the situation

- What do you want to do?
- What are the facts and circumstances of the situation?
- Does it break the rules, or the law, or is it inconsistent with Aeroklas Asia Pacific Group's policies?
- Is this consistent with your obligations under the Code?
- What ethical principle or principles does it relate to and why?
- Who is affected and are peoples' entitlements or obligations involved?

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Step 2. Look at the situation from a company standpoint

- What is your duty as an employee of the Aeroklas Asia Pacific Group?
- What legislation, company policies and procedures or guidelines are relevant?
- With whom should you consult?

Step 3. Would your actions or decisions withstand public scrutiny?

- Would a reasonable person consider that you were in a position to improperly use your powers or position?
- Would the public perceive your action or decision as honest and impartial?
- Is there a conflict of interest?

Step 4. Identify and consider the options

- Get advice from your manager or a Group Leadership Team member within the Aeroklas Asia Pacific Group.
- What are the options and what are the consequences that would result from each option?
- What are the costs and long-term consequences, if any?
- Are the options and consequences you have identified consistent with the four ethics principles and obligations?
- How would the public view a particular option?

Step 5. Choose your course of action

Make sure the course of action you have chosen:

- is within your position's authority and delegation and is consistent with the relevant legislation, policies and procedures, including this Code;
- is procedurally fair and can be justified to your manager and the Aeroklas Asia Pacific Group Executive team;
- is documented, if it is likely that a person will require a statement of reasons; and
- supports the Aeroklas Asia Pacific Group's vision, values, and goals

WHERE TO FROM HERE?

If, after reading this Code you are unsure about your obligation in general or in relation to a specific situation, you should discuss this with your manager.

If you have concerns about approaching your direct manager, you should contact the next senior person in your workplace. Where this is not possible or practical, you should make contact with the People & Culture team in Queensland who will be able to provide you with guidance and advice on the appropriate steps to follow to resolve your concerns.

REVIEW

Aeroklas Asia Pacific Group holds the right to review this Code of Conduct and update it when required.

APPROVAL

This Code has been approved by the Chief Executive Officer.

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