



Corporate Code of Conduct

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Authorised: Group Human Resources & Compliance Manager

1. PURPOSE

The purpose of this Corporate Code of Conduct is to provide a framework for decisions and actions in relation to ethical conduct in employment. It underpins M&D Jones Customs Pty Ltd / Tomax group companies' commitment to integrity and fair dealing in its business affairs and to a duty of care to all employees, clients and stakeholders. The document sets out the principles covering appropriate conduct in a variety of contexts and outlines the minimum standard of behaviour expected from employees of all Tomax group companies.

2. ACCOUNTABILITIES

2.1 Managers and Supervisors

Managers and supervisors are responsible and accountable for:

- (a) undertaking their duties and behaving in a manner that is consistent with the provisions of the Code of Conduct;
- (b) the effective implementation, promotion and support of the Code of Conduct in their areas of responsibility; and
- (c) ensuring employees under their supervision understand and follow the provisions outlined in the Code of Conduct.

2.2 Employees

All employees are responsible for:

- (a) undertaking their duties and behaving in a manner that is consistent with the provisions of the Code of Conduct;
- (b) reporting suspected corrupt conduct; and
- (c) reporting any departure from the Code of Conduct by themselves or others.

3. PERSONAL AND PROFESSIONAL BEHAVIOUR

When carrying out your duties, you should:

- (a) behave honestly and with integrity and report other employees who you suspect to be behaving dishonestly;
- (b) carry out your work with integrity and to a high standard;
- (c) operate within the law at all times;
- (d) follow all Policies and Procedures as set out by the Company; and
- (e) act in an appropriate, business-like manner at all times when representing the Company.

4. CONFLICT OF INTEREST

Potential for conflict of interest arises when it is likely that you could be influenced, or it could be perceived that you are influenced, by a personal interest when carrying out your duties. Conflicts of interest that lead to biased decision making may constitute corrupt conduct.

- (a) Some situations that may give rise to a conflict of interest include situations where you have:
 - (i) financial interests in a matter the Company deals with, or you are aware that your friends or relatives have a financial interest in the matter;
 - (ii) directorships/management of outside organisations;
 - (iii) membership of boards of outside organisations;
 - (iv) personal relationships with people the Company is dealing with which go beyond the level of a professional working relationship;
 - (v) secondary employment, business, commercial, or other activities outside of the workplace which impacts on your duty and obligations to the Company;
 - (vi) access to information that can be used for personal gain; and
 - (vii) offer of an inducement.
- (b) You may often be the only person aware of the potential for conflict. It is your responsibility to avoid any potential conflict from arising that could compromise your ability to perform your duties impartially. You must report any potential or actual conflicts of interest to your manager.
- (c) If you are uncertain whether a conflict exists, you should discuss that matter with your manager and attempt to resolve any conflicts that may exist.
- (d) You must not submit or accept any bribe, or other improper inducement. Any such inducements are to be reported to your manager.

5. PUBLIC AND MEDIA COMMENT

- (a) Individuals have a right to give their opinions on political and social issues in their private capacity as members of the community.
- (b) Employees must not make official comment on matters relating to the Company unless they are:
 - (i) authorised to do so by a Director;
 - (ii) giving evidence in court; or
 - (iii) otherwise authorised or required to by law.
- (c) Employees must not release unpublished or privileged information unless they have the authority to do so from a Director of the Company.

6. USE OF COMPANY RESOURCES

Requests to use Company resources outside core business time should be referred to management for approval. If employees are authorised to use Company resources outside core business times they must take responsibility for maintaining, replacing, and safeguarding the property and following any special directions or conditions that apply. Employees using Company resources **without** obtaining prior approval could face disciplinary and/or criminal action. Company resources are not to be used for any private commercial purposes.

7. SECURITY OF INFORMATION

Employees are to make sure that confidential and sensitive information cannot be accessed by unauthorised persons. Sensitive material should be securely stored overnight or when unattended. Employees must ensure that confidential information is only disclosed or discussed with people who are authorised to have access to it. It is considered a serious act of misconduct to deliberately release confidential documents or information to unauthorised persons, and may incur disciplinary action.

8. INTELLECTUAL PROPERTY/COPYRIGHT

Intellectual property includes the rights relating to operational systems, trademarks, service marks, commercial names, ad designations, and inventions and is valuable to the Company. The Company is the owner of intellectual property created by employees in the course of their employment unless a specific prior agreement has been made. Employees must obtain written permission from a Director to use any such intellectual property before making any use of that property for purposes other than as required in their role as employee.

9. DISCRIMINATION AND HARASSMENT

Employees must not harass, discriminate, or support others who harass and discriminate against colleagues or members of the public on the grounds of sex, pregnancy, marital status,

age, race (including their colour, nationality, descent, ethnic or religious background), physical or intellectual impairment, homosexuality or gender status.

Such harassment or discrimination may constitute an offence under legislation. Managers should understand and apply the principles of Equal Employment Opportunity as per the Tomax *Equal Employment Opportunity Policy* (#20130930-057A).

10. CORRUPT CONDUCT

Corrupt conduct involves the dishonest or partial use of power or position which results in one person/group being advantaged over another. Corruption can take many forms including, but not limited to:

- (a) official misconduct;
- (b) bribery and blackmail;
- (c) unauthorised use of confidential information;
- (d) fraud; and
- (e) theft.

Corrupt conduct will not be tolerated by the Company. Disciplinary action up to and including dismissal will be taken in the event of any employee participating in corrupt conduct. If appropriate, any conduct that may be a breach of law will be reported to Police and/or other appropriate authorities.

11. NATIONAL POLICE CHECKS & MANDATORY REPORTING

Employees are required to complete a National Police Check (on a platform determined by Tomax) prior to commencement of their employment with Tomax. Employees are then required to complete a subsequent National Police Check every two years of employment with Tomax.

Employees are required to report any pending or finalised court proceedings that they are the subject of during the two year period between National Police Checks. Failure to self-report any proceedings that are then identified in a subsequent two year National Police Check may result in disciplinary action and possible termination of your employment with Tomax.

12. OCCUPATIONAL HEALTH AND SAFETY

It is the responsibility of all employees to act in accordance with occupational health and safety legislation, regulations and policies applicable to their respective organisations and to use security and safety equipment provided.

Specifically all employees are responsible for safety in their work area by:

- (a) following the safety and security directives of management;
- (b) advising management of areas where there is potential problem in safety and reporting suspicious occurrences; and

- (c) minimising risks in the workplace.

13. SMOKEFREE WORK ENVIRONMENT

Tomax is committed to providing a safe working environment for all employees, including a smokefree workplace. Employees are **NOT** permitted to smoke while in a Tomax vehicle. If an employee is found to be smoking in a Tomax vehicle, they will on each occasion:

- First Occasion - Receive a First Written Warning;
- Second Occasion – Receive a Second and Final Written Warning; and
- Third Occasion – Employment terminated, effective immediately.

14. LEGISLATION

It is essential that all employees comply with the laws and regulations of the countries and states/provinces in which we operate. Violations of such laws may have serious consequences for the Company and any individuals concerned. Any known violation must be reported immediately to management.

15. FAIR DEALING

The Company aims to succeed through fair and honest competition and not through unethical or illegal business practices. Each employee should endeavour to deal fairly with the Company's suppliers, customers and other employees.

16. BREACHES OF THE CODE OF CONDUCT

Employees should note that breaches of certain sections of this Code of Conduct may be punishable under legislation. Breaches of this Code of Conduct may lead to disciplinary action. The process for disciplinary action is outlined in Company policies and guidelines, relevant industrial awards and agreements.

17. REPORTING MATTERS OF CONCERN

Employees are encouraged to raise any matters of concern in good faith with the CEO, CFO or the HR Manager without fear of retribution.

Employee Declaration

I hereby acknowledge that this Corporate Code of Conduct forms part of my employment conditions and I agree to abide by and be bound by Tomax Corporate Code of Conduct. I understand that my behaviour in representing the Company reflects accordingly on my work colleagues and the Company, and I will maintain a standard of behaviour and conduct in the best interests of the Company.

Employee Name: _____

Signature: _____

Date: _____

Manager to Witness: _____