



AUSREO CODE OF CONDUCT & WHISTLEBLOWER POLICY

Revised: 16 December 2020

CODE OF CONDUCT & BUSINESS ETHICS

Ausreo is committed to fair, honest and ethical business practices with our people, customers, and suppliers. All employees, director, officers, contractors, and suppliers must adhere to this code.

OBEYING THE LAW

We respect and obey the laws, rules and regulations applying to Ausreo.

ENVIRONMENT, HEALTH & SAFETY

We are committed to safeguarding the health and safety of our people and protecting the environment.

ACTING WITH INTEGRITY

We do not offer or accept bribes, kickbacks or inappropriate gifts or entertainment. We engage in business practices that are honest and fair.

AVOIDING CONFLICTS OF INTEREST

We avoid relationships or conduct that might compromise judgement or create actual or apparent conflicts between our personal interests and our loyalty to Ausreo. We do not use our position within Ausreo to obtain improper benefits for others or ourselves. We do not engage in activities or enter into relationships that compete with Ausreo.

PROTECTING ASSETS & INFORMATION

We use Ausreo property, information, and opportunities for Ausreo's business purposes and not for unauthorised use. We properly maintain the confidentiality of information and employee data entrusted to us by Ausreo or others.

INTEGRITY OF RECORDING & REPORTING OUR FINANCIAL RESULTS

We properly maintain accurate and complete financial and other business records, and communicate full, fair, accurate, timely and understandable financial results and other material information. We have developed a system of internal controls designed to preserve the integrity of our records and information.

RESPECTING DIVERSITY & FAIR EMPLOYMENT PRACTICES

We are committed to respecting a culturally diverse workforce through practices that provide equal access and fair treatment to all employees on the basis of merit. We do not tolerate harassment or discrimination in the workplace.

RESPECTING HUMAN RIGHTS

We respect human rights and require our suppliers to do the same.

DELIVERING QUALITY

We are committed to producing quality products and providing quality services.

COMPETING ETHICALLY

We gain competitive advantage through superior performance. We do not engage in unethical or illegal trade practices.

SELLING TO GOVERNMENTS

We comply with the special laws, rules, and regulations that relate to government contracts and relationships with government personnel.

POLITICAL CONTRIBUTIONS

We do not make contributions on behalf of Ausreo to political candidates or parties, even where lawful.

A Message from the CEO:

Each of us knows that every time we do the right thing, we reinforce the understanding among our fellow employees, our customers, our suppliers, and our shareholders that this is how we do business at Ausreo.

As you go about building Ausreo's future, please remember your shared responsibility to consistently apply our Code of Conduct and Business Ethics. We expect you to speak up if you see a potential breach or if there is an opportunity for us to improve on how we behave.

Dennis Crestani,
Managing Director and Chief Executive Officer

PURPOSE

AUSREO Pty Limited (AUSREO) aims to provide employees, directors, officers, contractors, suppliers, and clients with a supportive work environment in which they feel able to raise issues of legitimate concern to AUSREO, without fear of victimisation, detriment or other retribution. AUSREO is committed to high standards of conduct in all business activities and the development of a culture that promotes safe, lawful and ethical behaviour.

REPORTING ANY WRONGDOING

A Whistleblower may report any issue or behavior which they consider to be Reportable Conduct. The Whistleblower must act honestly and reasonably in making the report, with reasonable grounds to suspect that the Reportable Conduct has taken place. A Whistleblower may wish to report the conduct to their Supervisor, National HR Director or Manager.

An anonymous report can be made through the EthicsPoint website ausreo.ethicspoint.com or hotline on **1-800-81-3948**. This website and hotline is maintained by an independent company, NAVEX Global, who will not under any circumstances provide the whistleblowers identity to Ausreo without the whistleblowers consent.

All reports of wrongdoing will go to the Ausreo Compliance Committee comprised of the CEO, CFO, and National Human Resource Director. The Ausreo Compliance Committee is responsible for ensuring the reported matter is properly dealt with.

Where it is shown that a person purporting to be a whistleblower has knowingly made a false report of wrongdoing, then that conduct itself will be considered a serious matter.

PROTECTION OF WHISTLEBLOWERS

Ausreo is committed to protecting and respecting the rights of a person who reports wrongdoing in good faith. Ausreo will not tolerate any retaliatory acts or threats of retaliation against any person who has made, or is believed to have made a report of wrongdoing. AUSREO may use various measures and mechanisms to protect the anonymity of a Whistleblower (if a Whistleblower elects to remain anonymous) and the confidentiality of a Whistleblower Disclosure.

PROTECTION FROM VICTIMISATION

Victimisation is a breach of this policy and of the law. Ausreo is committed to ensuring that Whistleblowers who make a Whistleblower Disclosure are treated fairly and do not suffer Victimisation. Ausreo may use various measures to protect Whistleblowers from Victimisation, which will depend on the particular circumstances of the Whistleblower Disclosure.

INVESTIGATION

All reports of alleged or suspected reportable conduct made under this policy will be properly assessed, and if appropriate, independently investigated with the objective of locating evidence that either substantiates or refutes the claims made by the whistleblower.

The investigation will not be conducted by a person who may be the subject of the investigation or has inappropriate links or connections (actual or perceived) to the person(s) or practice(s) under investigation.

If the identity of the whistleblower is known, the Ausreo Compliance Committee will keep the whistleblower informed of the outcomes of the investigation to his/her report subject to the considerations of privacy of those against whom the allegations have been made.

Throughout the assessment and investigation process Ausreo will treat fairly the person who is the subject of a report. The timeframe of an investigation will vary for each matter and will depend on a number of factors.

**Dennis Crestani,
Managing Director and Chief Executive Officer**