

KALBAR OPERATIONS PTY LTD

Code of Conduct

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CODE OF CONDUCT

1 Introduction from the CEO

At Kalbar Operations Pty Ltd (**Kalbar**) we are committed to conducting our operations ethically, with integrity, and in compliance with all applicable laws and regulations.

Strong and long-term financial performance is paramount to our success. To achieve this it is key to develop the companies safely, ethically and sustainably, which can only be achieved by recognising the interests of those we touch and interact with in all aspects of our business. In doing so, we must take into consideration the interests of our customers, employees, shareholders, investors and suppliers, as well as the environment and the local communities in which we operate.

It is extremely important that we comply with applicable laws and regulations, and are able to demonstrate our compliance. As such, this Code of Conduct document is a guide for our success as a business. It provides an overview of the ethical conduct we expect from all Personnel and Business Partners of Kalbar, and represents our commitment to act ethically, lawfully, sustainably and with integrity.

We recognise that our people are fundamental to our success. Nothing is more important than everyone going home safe and well every day. We strive to build a diverse and inclusive culture where everyone can perform to their full potential. I am proud to be part of a team that works together to uphold our values, placing importance not just on what we do, but how we do it.

If you are unsure about this Code of Conduct or if you do not know what to do in a specific situation, I encourage you to ask questions and raise your concerns with its **Compliance Officer**, Kalbar's Chief Financial Officer, Cameron Knox.

Our reputation is just as valuable as our employees and company assets. It is the personal responsibility of each of us to maintain it by putting this Code into practice.

Thank you for embracing our values.



Jozsef Patarica
Chief Executive Officer,
Kalbar Operations Pty Ltd

2 Key Terms

- **Business Partners** means third party individuals (i.e. those individuals not included in the definition of Personnel) or entities engaged by Kalbar to interact with external parties for or on behalf of Kalbar or to otherwise represent Kalbar before those external parties (for example, agents, consultants, brokers, introducers, commercial representatives, political advisors). Third parties that do not interact with others on behalf of Kalbar are not Business Partners (e.g. customers, utility companies, banks, Suppliers). Further guidance on the types of third parties who are Business Partners is set out in the Anti-Corruption Policy (**ABC Policy**).
- **Confidential Information** means confidential or trade information belonging to Kalbar or disclosed to Kalbar under obligations of confidentiality, including, but not limited to: (1) financial information, business strategies or plans, business practices, systems and processes, and other similar information which is not in the public domain; (2) product specifications, pricing policies, sales or marketing information; (3) customer and Supplier contracts; (4) Personnel information; (5) technical information; (6) intellectual property, including inventions, innovations and trade secrets.
- **Facilitating Payment** means a payment made to a Government Official to secure the performance of any routine or non-discretionary government action, which is ordinarily or commonly performed by a Government Official, such as processing government paperwork or providing telephone or mail service, but does not include payments that are required under local law.
- **Government Official** means any: (1) officer, employee or agent of any government or public international organisation (e.g., United Nations, World Bank) or any agency, department or instrumentality thereof (including officers, employees or agents of a company or business owned (even partially), controlled, or operated by any government or public international organisation); (2) officer, employee or agent of a political party; (3) candidate for political office; (4) leader of an indigenous, tribal or native title-holding group; or (5) person acting on behalf of any of the foregoing. Note that close relatives or associates of Government Officials also sometimes must be treated as if they were Government Officials themselves.
- **Personal Safety Payment** means any payment made in situations *where harm to an individual's health or safety appears real and imminent*, or where that individual believes that they or others may be in imminent danger, if payment is not made. Payments made to ensure the safety and integrity of property or other assets are not Personal Safety Payments.
- **Personnel** means all employees, officers, and directors, as well as all other individuals who work at or with Kalbar in the same capacity as an employee, including agency workers, secondees and contract hires.
- **Supplier** means a third party that supplies goods or services to Kalbar but has not been engaged to act for, or on behalf of, Kalbar and, therefore, does not fall within the definition of a Business Partner.

3 Purpose, scope and applying our values

Purpose

This Code of Conduct (**Code**) is a statement of the principles of conduct and ethics that Kalbar has committed to uphold in its business and operations. Its purpose is to:

- outline the requirements to comply with applicable law;
- provide standards of conduct within Kalbar;
- promote fair and honest dealings with those with whom Kalbar does business;
- state our commitment to the environment and to the health and safety of our workplace, and to do our work in a socially responsible manner; and
- promote a culture of honesty and accountability.

The principles and standards set out in this Code are supplemented by internal policies and procedures, which together establish a framework in which we can exercise our responsibilities.

In the event of a conflict between this Code and any other applicable company policy, procedure or guidance, you must adhere to the more restrictive requirement. If you have any doubt, you should contact the Compliance Officer for guidance.

Scope

This Code applies to all:

- Personnel;
- Kalbar operations, including all legal entities and business area units and joint ventures operated by Kalbar or in which Kalbar holds a controlling interest (for joint ventures over which Kalbar is unable to exercise control, we will endeavour to influence their policies and practice, so that they reflect the values described in this Code); and
- Business Partners.

Applying our values

When in doubt about a potential course of conduct covered under this Code, consider the following questions:

- Is the conduct legal and is it ethical?
- Would the conduct reflect positively on Kalbar and me personally?

If any questions arise regarding what behaviour is appropriate in any given situation, or if you are ever concerned that our Code is not being followed, please speak up and share your concerns without hesitation. Concerns can be raised internally to the Compliance Officer.

Please consult Section 11 of this Code (*Whistleblowing, Reporting Hotline and Contact Details*) if you need further information on speaking up when you are worried that things may be going wrong.

4 Our people

Inclusion, diversity and equality

The welfare of Personnel and safe and healthy working conditions are of paramount importance to Kalbar. We aim to make sure that everyone at Kalbar is treated with fairness, respect and dignity. All Personnel are valued members of Kalbar.

Kalbar fosters a work environment in which all individuals are treated with dignity and respect. We believe everyone should have equal opportunity and we will recruit, select and develop our Personnel on merit, irrespective of their gender, race, colour, religion, age, sexual orientation, marital status, disability or any other characteristics protected by applicable laws.

Harassment, bullying and discrimination

Personnel are expected to conduct themselves in a professional manner. We do not tolerate any form of abuse or harassment of Personnel, contractors, Suppliers, customers or anyone else we deal with. Intimidation, harassment, racist remarks, discriminating conduct, bad language, verbal aggression, physical aggression or threatening behaviour, insult and sexual intimidation are serious misconducts warranting disciplinary action.

Expectations on leaders

All managers and leaders within Kalbar are expected to:

- help create a collaborative workplace in which Personnel can reach their full potential;
- demonstrate appropriate behavior and take immediate action to address any conduct inconsistent with our Code;
- run our business safely and effectively (managing risks as well as driving innovation and improvement); and
- drive performance and accountability in the workplace.

Respecting human rights

We respect human rights of all those working for or with us, and of the people in the communities in which we operate. We are committed to ensuring no modern slavery happens within our operations or supply chains, including no human trafficking, forced, bonded, or involuntary labour and no child labour. We will not exploit anyone and will not do business with companies, organizations, or individuals that we believe are not working in accordance with the same human rights standards as we do.

Data privacy and protection of personal information

Kalbar respects people's privacy and the confidentiality of personal information. Personal information is only acquired and kept for the purposes of operating our business effectively, or complying with the law. Once collected, personal information will be kept and processed in accordance with applicable data privacy and data protection laws. If we have a need to share personal information with third parties, we take reasonable steps to ensure that they also manage the information appropriately and keep it secure.

5 Health, safety and the environment

Health, safety and security

We recognise that we operate in hazardous environments, and we take care to protect the environment and respect the rights of local communities. In addition, Kalbar is committed to ensuring the health, safety and security of our workplace. There is no business objective that will take priority over health and safety.

Personnel are expected to:

- be aware of, comply with and observe all rules regarding personal protection equipment and safety;
- be well rested, physically and mentally fit;
- not to work under the influence of drugs or alcohol; and
- follow all smoking, drugs and alcohol restrictions on site.

We encourage Personnel to raise health, safety and security-related concerns and expect transparent reporting. Covering up incidents is considered a direct breach of this Code. Consequences for breach of this Code are outlined at section 10 (*Mandatory compliance, certification and consequences of non-compliance*).

Community interactions

Kalbar seeks to identify, build, manage and maintain strong and sustainable relationships with local communities where we operate.

We strive to make a positive difference by developing natural resources to improve people's lives now and for future generations. We help do this by managing the impact of our business and through our local community-based activities and investment programmes.

Investment in a community should be relevant to the local need but at the same time aligned with our business and carried out in partnership with local organisations. Doing so helps to ensure our activities have a meaningful and sustainable impact on that community.

Environmental stewardship

Environmental stewardship is a major part of our identity. Kalbar seeks to minimize and off-set the impact of our operations on the environment. We are committed to treating natural resources with care so they are available for future generations.

Kalbar and its Personnel are responsible for:

- being personally environmentally aware;
- complying with applicable environmental laws and regulations;
- understanding the environmental risks and impacts of our work and trying to minimise them, including in relation to biodiversity, waste, water and emissions;
- reporting actual or potential environmental incidents; and
- making sure our relevant Business Partners respect and also work in accordance with our environmental requirements and commitments.

We do all this by considering environmental factors through all phases of our operations.

6 Anti-bribery and corruption

Bribery and corruption

Kalbar strictly forbids all forms of bribery and corruption and will take reasonable and necessary steps to ensure that such conduct do not occur in Kalbar's business operations.

In all aspects of our business, Kalbar's Personnel are expected to abide by the ABC Policy. All Business Partners are also subject to our ABC Policy.

Under the ABC Policy, all Personnel and Business Partners are prohibited from, directly or indirectly, offering, promising, giving or demanding a bribe or other undue/improper advantage, with the intention of corruption, to or from Government Officials, third parties or other individuals closely associated with such Government Officials and third parties (such as family members).

Kalbar strictly prohibits the paying of Facilitating Payments in the conduct of its business.

We will seek to influence the policies and actions of our other Business Partners so that they too meet their ethical and legal responsibilities. All Business Partners who act on behalf of Kalbar must comply with applicable bribery and corruption laws.

The health and safety of Personnel is paramount, and Personnel should always take reasonable steps to keep themselves safe. Personal Safety Payments are permitted under the ABC Policy in certain limited circumstances; however, they must be immediately reported to the Compliance Officer.

Dealing with Government Officials

We interact with Government Officials in an open and transparent manner. We will ensure that any information provided to a government or a regulatory body is true and accurate.

It is never appropriate to attempt to influence a decision by offering personal benefits of any kind to a Government Official.

In order to mitigate the risks associated with interactions with Government Officials, all face-to-face meetings between Kalbar and Government Officials must be attended by at least two Kalbar Personnel. Personnel and Business Partners must take minutes of all meetings with Government Officials and retain them as part of Kalbar's records.

It is strictly forbidden to give or promise to give, offer, pay or promise to pay in any way, directly or indirectly, anything of value to any Government Official in exchange for an unfair favorable action or an improper business advantage.

Gifts and hospitality

Exchanging reasonable gifts of nominal value and sharing hospitality (e.g. coffee, meals) in connection with a legitimate business purpose can foster constructive business relationships. However, they should never be given as a means of influencing another person's decision-making (such as during a bid or pitch process). In some cases, they may be considered to be bribes, especially when the recipient is a Government Official. They should always be reasonable and modest in value (it is prohibited to give gifts and hospitality over AUD\$100.00 in value), and only be given or received in accordance with the Gifts and Hospitality Procedure (appended to the ABC Policy).

Political contributions and charitable donations

Kalbar does not allow contributions to political parties and/or to candidates for political office to be made by or on behalf of Kalbar.

Any charitable donations made by Kalbar (or in its name) must be made in accordance with the *Charitable Donations, Sponsorships and Community Investments Procedure* (annexed to the ABC Policy) and approved by the Compliance Officer.

Recruitment of Personnel

The recruitment of all Personnel should be based on approved selection criteria to ensure that only the most qualified and suitable individuals are employed. This is crucial to ensure that no element of corruption is involved in the hiring of Personnel.

In line with this, proper background checks should be conducted and recorded in order to ensure that the potential Personnel has not been convicted in any bribery or corruption cases nationally or internationally. More detailed background checks should be taken when hiring Personnel that would be responsible in management positions, as they would be tasked with decision making obligations.

Kalbar will not recruit or offer to recruit, on a permanent or a temporary basis, Personnel who are (i) Government Officials; (ii) immediate family members of Government Officials; or (iii) immediate family members of existing Personnel unless the approved selection criteria have been applied and authorisation has been obtained from the Compliance Officer.

Tendering and bidding

Kalbar selects Suppliers based on quality, need, performance and cost. It is the responsibility of Personnel to select Suppliers based on merit, without any favouritism or discrimination during the selection process.

Unless otherwise justified pursuant to this Policy, all tenders should be subject to a competitive proposal process. A competitive tender process requires a formal written proposal to be solicited from a minimum of two (2) Suppliers. All documentation related to Supplier selection in a competitive tender process should be retained for record keeping purposes.

Sole source tenders must receive approval from the Compliance Officer and will only be authorised in cases of an emergency situation where the requirements set out in this Code cannot be complied with (such as in the case of a credible threat to health, safety, security, the environment or the maintenance of essential company services) and response to the emergency requires the immediate procurement of goods and/or services.

Approval authorities

The approval of certain specified transactions and events can only be granted in accordance with Kalbar's Legal Authorities Matrix in its Delegation of Authorities Policy. Failure to obtain approval from the requisite level of authority amounts to a violation of this Code.

7 Fraud and other illegal conduct

Personnel are expected to abide by all Kalbar policies, including the ABC Policy. All Business Partners are also subject to our ABC Policy. Consequences for breach of this Code are outlined at section 10 (*Mandatory compliance, certification and consequences of non-compliance*).

Fraud

Kalbar strictly prohibits all forms of fraud and theft and does its utmost to protect the company from such activity at all times.

Fraud typically means obtaining a benefit by deceiving others, acting dishonestly, or abusing your position with the intention of securing an unfair or unlawful advantage. Fraud is usually carried out to wrongfully obtain money, goods or services.

Examples of fraudulent activity include:

- making expenses claims that were not incurred during the course of business for Kalbar;
- approving expenses or charging them to a customer if there is reason to believe they are false or not related to Kalbar's business;
- submitting false or incomplete invoices that do not comply with contract terms; and
- using Kalbar's money or resources for something improper or not legitimately connected to our business.

Insider trading

Kalbar prohibits insider trading and will comply with applicable laws. Insider trading occurs when any person purchases or sells a company stock, bonds or other securities while in possession of inside information relating to the company which issued the security. Inside information is information that is not publicly available and could have an impact on the company's share price if it becomes public.

Money laundering

Kalbar will always comply with anti-money laundering laws and regulations.

Money laundering is the process of transacting in money or other property of criminal origin.

We will strive to minimise money laundering risks through our compliance measures which are designed to avoid receiving or being involved in an arrangement or transaction that relates to funds that may have a criminal origin.

Competing fairly

Kalbar's Personnel must comply with applicable competition (antitrust) laws. These laws protect free enterprise by prohibiting anti-competitive behaviour by companies and individuals. We compete fairly, ethically and do not engage in any anti-competitive behaviour that would harm Kalbar's business and reputation.

Examples of anti-competitive behaviour include:

- agreeing, even informally, with competitors on pricing, customers or markets without a lawful reason (i.e. price fixing);
- discussing competitively sensitive information at an industry meeting (either directly or indirectly) (i.e. market sharing);
- sharing any information about bid or tender processes, such as whether a bid will be submitted or any bid pricing or other commercial terms (i.e. bid rigging); and
- engaging in any behaviour that limits trade or that restricts fair competition.

Personnel involved in interacting with Kalbar's competitors should exercise care not to engage in, be part of or act in any way which others could perceive as collusive or co-operative conduct with a competitor, either directly or indirectly via third parties.

Complying with economic and trade sanctions

Economic and trade sanctions are measures imposed by governments and international bodies (including United Nations, United States, United Kingdom and European Union) to restrict dealings with certain countries, entities and individuals. These measures include; broad prohibitions on dealings with or within certain countries; trade restrictions; financial sanctions, such as asset freezes; and travel bans.

Kalbar will comply with all applicable sanctions, even if this means foregoing business opportunities. Failure to comply with sanctions can lead to severe civil and criminal penalties, both for Kalbar's businesses and individual Personnel, as well as significant reputational damage for Kalbar.

8 Avoiding conflicts of interest

REMINDER: Kalbar's Personnel are expected to abide by all Kalbar policies, including the ABC Policy. All Business Partners are also subject to our ABC Policy. Consequences for breach of this Code are outlined at section 10 (*Mandatory compliance, certification and consequences of non-compliance*).

Conflicts of interest

We expect Personnel to always act in the best interests of Kalbar and not to be in conflict with those interests. Where conflicts do or may happen, they should be disclosed to the Compliance Officer and carefully managed, to avoid even the appearance of improper behaviour.

Personnel are expected not to be involved in activities where their personal, social, financial or political interests interfere, or could potentially interfere, with Kalbar's business interests.

Examples of potential conflicts of interest could include:

- engaging with a customer where close relatives are employed by the customer in relevant business areas;
- appointing a supplier where you have a financial interest in that supplier;
- participating in the hiring or recruitment process for a position within Kalbar where the candidate is a relative or close friend;
- accepting any form of personal benefit, directly or indirectly, from a third party who is bidding for or trying to retain Kalbar business;
- commencing employment, or accepting advisory or other affiliated roles, including board seats, with Kalbar's competitors, suppliers or contractors;
- investing in or otherwise providing a benefit to a competitor of Kalbar; and
- investing in a current or prospective vendor or supplier to Kalbar.

Anything that might be construed as creating conflict between your interests and those of Kalbar must be declared immediately in writing by you to the Compliance Officer.

Personnel are prohibited from simultaneously working for any of Kalbar's competitors, customers or suppliers in any capacity. The express written permission from the Compliance Officer must be granted for the provision of paid work for other third parties, or for an independent business operation.

9 Safeguarding information and assets

Confidential Information

During the normal course of business, Personnel and Business Partners may gain possession of, or access to, information which is confidential to Kalbar. Kalbar is careful to deal with Confidential Information in such a way that protects Kalbar's interest.

Kalbar will keep Confidential Information belonging to Kalbar or to customers or other third parties safe and only share it on a 'need to know' basis. Kalbar will only disclose Confidential Information to third parties if properly authorized to do so and on a confidential basis.

Protection of company assets

It is the responsibility of everyone at Kalbar to make sure that company assets are treated with due care and respect, not misused or wasted. We do not lend, transfer, sell, or give away these assets unless this has been properly approved. We never use them for personal gain.

Company assets includes both physical and intangible assets such as property, proprietary information and intellectual property, business opportunities, company funds, company equipment, company time and other confidential information. Company assets should only be used for their intended purpose and must only be used for personal purposes with approval from the Compliance Officer.

The misuse of Kalbar's property for individual profit or any unlawful unauthorised personal or unethical purpose is prohibited. We also prohibit falsifying, stealing, concealing or otherwise tampering with company information or data.

Use of company systems and information

Kalbar's information technology systems, including computers, intranet and internet access, telephones, voicemail and e-mail, are the property of the Company and are to be used primarily for business purposes.

Occasional, minor or incidental reasonable personal use of email, internet and telephone is permitted provided it that such use is kept at a minimum and doesn't interfere with work duties or Kalbar information systems. You must not use Kalbar's information technology systems to allow others to gain access to our information technology systems through the use of your password or other security codes, send harassing, threatening or obscene messages, send chain letters, access the internet for inappropriate use or conduct personal commercial business.

Kalbar may monitor the use of its information technology systems and block access, if required. Inappropriate use of Kalbar's company assets and information technology systems may lead to disciplinary consequences, including civil and/or criminal action.

Personnel must return all company assets at the end of their employment or involvement with Kalbar.

Accounting and financial records

Kalbar's accounting and financial records must:

- record in an accurate, complete and timely manner, in reasonable detail, all assets, liabilities, revenues and expenses of the company;
- appropriately reflect Kalbar's transactions; and
- conform to applicable accounting and financial reporting laws, rules and regulations.

It is prohibited to falsify information about the company's assets, and to hide information about assets, liabilities, revenues or expenses or falsify invoices. No secret or unrecorded funds or other assets are to be established or maintained. No action shall be taken to fraudulently influence, coerce, manipulate or mislead anyone engaged in the performance of an audit of Kalbar's financial statements.

If you are responsible for Kalbar's accounting and financial records, you must follow our system of internal controls. All invoices and expense reports must be complete and accurate, both quantitatively and qualitatively.

Records retention

Kalbar prohibits the unauthorized destruction of or tampering with any records, whether written or in electronic form, where the company is required by applicable law to maintain such records or where it has reason to know of a threatened or pending government investigation or litigation relating to such records.

Auditing

Kalbar's management will design and execute an audit plan on compliance with this Code, as well as specific accounting and finance issues, which is designed to continuously monitor business and compliance risk issues. These audits will take place at random intervals decided by management, and will supplement the day-to-day financial controls system in place at Kalbar.

10 Mandatory compliance, certification and consequences of non-compliance

Mandatory compliance

Compliance with this Code is mandatory for all Personnel and Business Partners.

Personnel must complete all training as required by Kalbar and comply with all laws, regulations, this Code and other applicable Kalbar policies, standards and procedures relevant to your role or work for Kalbar. Kalbar requires its Personnel to abide by applicable policies, including the ABC Policy, Delegation of Authorities Policy, and Whistleblower Policy.

Certification

All Personnel and Business Partners are required to certify that they have read, understand and will comply with this Code. This Code will be provided to all Personnel at point of onboarding, who will be required to certify their compliance in the form set out in Appendix I to this Code.

Consequences of non-compliance

We will consider non-compliance with the Code as a serious matter warranting disciplinary action, up to and including dismissal. A breach committed by a Business Partner may result in Kalbar terminating its relationship with them.

In some instances, non-compliance may result in a violation of the law, which can result in monetary fines for Kalbar or individuals involved, as well as imprisonment. A breach may also result in legal action (for example, Kalbar may sue to recover stolen company assets, including monies from fraudulent conduct).

If you become aware of any information that leads you to believe that this Code has been breached, you should alert the Compliance Officer immediately or consult Section 11 of this Code (*Whistleblowing, Reporting Hotline and Contact Details*). This section explains how to confidentially and anonymously report your concerns, and confirms that Kalbar will protect good-faith whistleblowers from retaliation.

11 Whistleblowing, Reporting Hotline and Contact Details

Reporting unethical behavior

If you believe you have experienced or witnessed unethical behavior at Kalbar you have a responsibility to do something about it. We want to assure you that you can raise a concern in a secure and confidential way. Such concerns will be properly addressed and investigated confidentially in accordance with Kalbar's Whistleblower Policy.

You should not be concerned that there will be any adverse personal consequences for reporting a genuine concern. You should start by addressing your concerns with your immediate manager or supervisor. If you do not feel that this is appropriate, you can contact the Compliance Officer.

Wherever possible, you are encouraged to report concerns relating to suspected wrongdoing or danger internally first. However, if you do not feel comfortable raising your question or concern through any of the above channels, Personnel and Business Partners can also contact the company's external independent disclosure reporting service STOPLINE, details provided below. To the extent permitted by law, such reports can be made anonymously.

STOPLINE contact details:

Phone: 1300 30 45 50 (in Australia)
Website & Online Reporting Form: <https://kalbaroperations.stoplinereport.com/>
Mail: Kalbar Operations Pty Ltd
C/- The STOPLINE
PO Box 403, Diamond Creek VIC 3089
Mobile app: stopline365

Stopline operators are not associated with Kalbar, and are trained specialists in dealing with matters of reported misconduct. Reports to the extent permitted by law to Stopline may be made completely anonymously.

Stopline will prepare a report of the reported misconduct and provide this to the Whistleblower Protection Officer.

Generally, you will be informed about the resolution of the concerns you have raised, to the extent permitted by law and subject to any confidentiality considerations.

No retaliation

Kalbar is fully committed to ensuring that no one suffers any adverse treatment (including disciplinary action, threats of any kind, or any other repercussions) as a result of reporting any concerns in good faith. We have strong procedures in place to ensure the independence, impartiality and confidentiality of the reporting process. Kalbar does not permit any form of intimidation or retaliation (such as demotion, suspension, threats or harassment) related to reporting. Retaliation will be met with disciplinary action, up to and including termination. Please report retaliation so that we can take appropriate steps to manage it.

External reporting

Nothing in our Code prevents you from, or requires approval for, reporting what you reasonably believe is a breach of the law to an appropriate government authority or from seeking legal advice on your rights.

12 Policy Review

Kalbar reserves the right to amend or revise this Code of Conduct from time to time to meet both regulatory and contemporary industry standards and practices and all amendments and revisions are effective immediately upon posting. Personnel and Business Partners must review this Code of Conduct from time to time to ensure they are in compliance.

Related documents:

- ABC Policy
- Whistleblower Blower Policy

APPENDIX I

Personnel Compliance Certificate

I _____, certify that I have read, understand and will comply with the Kalbar Operations Pty Ltd (**Kalbar**) Kalbar Code of Conduct (**Code**).

I further certify that except as detailed below or previously reported to Kalbar's Compliance Officer I have never participated in, and am not aware of any violation of Kalbar's Code.

Should I obtain information about a known or suspected violation of the Code, I will report any such violation to the appropriate parties as set forth in Section 11 of the Code.

Signature: _____

Printed Name: _____

Title: _____

Date: _____

Below are all instances of which I am aware, if any, of actual or suspected violations of Kalbar's Code:
