



CODE OF CONDUCT POLICY

Policy Reference	Policy Owner	BAI Companies
HR-POL-1018	Human Resources	BAI Communications (Australia) BAI Communications – Group Support

1 Introduction

The BAI Code of Conduct supports our values of ‘being courageous and do what matters’. It also reflects how we do our work and how we operate across the company. Our Code of Conduct aims to clarify expectations of behaviour and conduct at work as well as representatives of BAI Communications.

This Code provides an overview of the Company’s fundamental business values. It is by no means exhaustive, but summarises some of the Company’s most important policies, which are based on standards that underlie our business ethics and professional integrity; standards that apply to all employees in all locations. The Company expects employees to observe the standards set out in this policy and non-compliance may result in disciplinary action.

2 Approver

Name	Position	Signature	Date
Caren Schadel	Chief People Officer		29 October 2019

3 Policy Statement

This Code of Conduct addresses our responsibilities to the Company, to each other, management, customers, contractors, suppliers and the public.

All employees must follow the law, behave ethically, act with integrity and honesty in all matters, conduct themselves in a professional and courteous manner and be accountable for their actions.

Employees are required to observe the following standards of behaviour both within and outside the workplace where the individual can be perceived as representing the Company:

1. Comply with all laws, policies, procedures, rules, regulations and contracts.
2. Display the appropriate image of professionalism at the workplace. Wear the required uniform, safety equipment or work attire, and if an employee wears their own attire, ensure their appearance is neat and tidy. If supplied with Company clothing, ensure it is kept in a good condition.
3. Treat customers, clients, suppliers, co-workers, company management and the public in a non-discriminatory manner with proper regard for their rights and dignity. In this regard, discrimination, victimisation or harassment based on a person’s race, colour, creed, religion, national origin, citizenship,

age, sex, sexual orientation, marital status, union membership or non-membership, mental illness, mental or physical disability or any other classification protected by law will not be tolerated.

4. Be honest and fair in all dealings with customers, contractors, suppliers, co-workers and the public.
5. Promptly report to a Manager, Executive Manager or Human Resources any violations or suspected violations of laws, Company policies, regulations and Company contracts that come to your attention.
6. Immediately report to a Senior Manager or Human Resources any reasonable suspicions that a fraudulent or dishonest activity is taking place.
7. Maintain punctuality. If an employee is late or unable to report for work, contact the supervisor as soon as possible to let them know via phone call, text or email.
8. Avoid positions where the employee's personal interests' conflict, or are perceived to conflict, with the Company's business interests and/or where the employee's ability to carry out their duties is compromised or may be perceived to have been compromised. Where a conflict of interest is suspected, this should be reported as soon as possible, as well as declare the information in writing to Human Resources or a Senior Manager.
9. Maintain and develop the knowledge and skills necessary to carry out duties and responsibilities, and actively adopt learning opportunities to support work performance.
10. Observe health, safety and environment policies and obligations, and co-operate with all procedures and initiatives taken in the interests of occupational health and safety.
11. Avoid having an interest, either directly or indirectly, financially or otherwise, in any person or company with which the BAI Group has commercial relations (including suppliers and customers) which may be detrimental to the best interests of the BAI Group (except for investment holdings of 5% or less of the voting shares in any company listed on a recognised Stock Exchange).
12. Avoid being involved in outside employment or political activities, which affect, or may be perceived to affect, the employee's ability to perform the requirements of their role, including but not limited to any business activity which competes with the Company's business either on the employee's own account or by working for a competitor.
13. Avoid using material, non-public information that a reasonable investor would consider important in a decision to buy, hold or sell stock to buy or sell Company shares or pass the information on to anyone else to persuade them to do so. Examples of material information include but are not limited to news of a pending merger, acquisition or tender offer; projections of future earnings or losses; news of a sale of assets or a subsidiary; changes in dividend policies or the declaration of a share split significant new products or discoveries or the financial status of the Company.
14. Conduct yourself professionally and respectfully in the workplace, including but not limited to refraining from verbal abuse, violence, vilification or swearing.
15. Respect the Company's ownership, and use for business reasons only, all Company funds, equipment, supplies, books, records and property.
16. Not use, directly or indirectly, the funds and assets of the Company for political contribution or illegal payments of any kind, including but not limited to the payment of bribes, including those to retain business or secure new business.
17. Not accept any potentially improper payments, including gifts and hospitality, other than those of very modest amounts.
18. Maintain the privacy of any confidential information, records or other materials acquired during the employment with The Company.
19. Not make any unauthorised statements to the media about the Company's business (requests for media statements should be referred to the line manager or communications team).
20. Report fit to work. Never report for work under the influence of illicit drugs or alcohol. Workplace participants may be required to produce medical evidence to prove their medication does not affect their capacity to work and to work safely.

21. Not smoke during working hours unless during prescribed breaks and within designated areas.
22. Seek the advice and recommendation from a Senior Manager or Human Resources in the event of any questions arising as to whether specific conduct would be deemed appropriate within the Company.

Additional Responsibilities of Managers and Supervisors

In addition to the list above, Managers and Supervisors should also:

- Demonstrate behaviours which mirror our Code of Conduct and values of 'being courageous and do what matters'.
- Maintain confidentiality when conducting investigations into grievances and disputes.
- Avoid bias in decision making and take steps to promote an inclusive workplace.
- Ensure compliance with procedures when carrying out counselling and discipline.
- Exercise objectivity when administering rewards or discipline.
- Not condone, permit, or fail to report any breaches of the above Code by workplace participants under their supervision.

Policy Review

Policy review will take place in line with legislative changes or business requirements.

Definitions

Company means the relevant company within the BAI Communications Group.

4 Change History

Number	Amendment Issue Date	Description of Changes
1	1 April 2010	First issue
2	13 November 2017	New branding template
3	11 April 2019	Second issue
4	29 October 2019	New Australian branding update