



CODE OF CONDUCT **SERVCORP LIMITED**

ACN 089 222 506

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SERVCORP LIMITED

CODE OF CONDUCT

1 Purpose

This Code of Conduct provides every Servcorp (“**SRV**”) Director, Senior Executive and employee (“**Team Members**”) with clear expectations of the way in which we must conduct business lawfully, ethically and responsibly. We each play a part in enhancing and protecting SRV’s reputation, no matter what your role. As the global leader in providing Workspace Solutions, we must remember that both our words and actions demonstrate to our stakeholders how we are dedicated to upholding the standards and values of SRV.

Please use the Code of Conduct, as well as SRV’s policies, procedures, and core values in your day-to-day work, to guide you in making the right choices. Every day, we face difficult and complex decisions, which is why this document is here for you to consult, to provide direction and support. If in doubt as to the right course of action, please do not hesitate to reach out to your Manager.

This Code of Conduct sets out the standards of conduct and personal behaviour required of you, and Team Members should also appreciate that departure from the provisions of the Code of Conduct may result in disciplinary action being taken.

2 Statement of Values

At all times, honesty, integrity, trust, respect, transparency and cooperation are the basis for SRV to uphold a sound and enduring business reputation.

Directors and Team Members are required to perform their duties in a spirit of commitment to the vision and core values of SRV. This includes a responsibility to meet the standards of legal, professional and ethical behaviour required by SRV, its clients, its contractors, suppliers and the general public, where relevant.

3 Scope

The Code of Conduct applies to all Team Members of SRV, including part time and casual staff, as well as contractors and consultants. A number of the requirements that come under this Code of Conduct are the subject of specific Company policies as well as specific provisions of various Acts and Regulations. Some are generally acknowledged conventions that reflect normal community expectations.

4 Conduct standards

- A. Honesty, integrity and fairness
- B. Lawful, ethical and responsible
- C. Confidentiality
- D. Fair competition
- E. Trading in SRV shares
- F. Conflicts of interest
- G. Involvement in other employment or business, including directorships
- H. Media or public comment
- I. Fair and safe work environment
- J. Communications
- K. Use of company resources
- L. Out of hours conduct
- M. Anti-bribery and corruption
- N. Human rights
- O. Financial probity and accountability

A. Honesty, integrity and fairness

SRV's core values define the way we interact with each other, our customers and our stakeholders. We act with honesty, integrity and fairness in all our dealings, internal and external. We challenge actions that are inconsistent with our core values.

B. Lawful, ethical and responsible

SRV Team Members must comply with all applicable laws, legislation, regulations and standards relevant to their positions and contracts, and always act in accordance with their legal duty of care to clients. This includes, but is not limited to, legislation relating to industrial relations, privacy, discrimination, bullying and harassment, and work health and safety.

Team Members must ensure they understand and comply with all SRV policies, including this Code of Conduct.

Beyond legislated and written requirements, Team Members should always conduct themselves in a manner that is open and trustworthy.

C. Confidentiality

As a Company, we routinely receive and handle confidential information. We preserve the trust placed in us by third parties by accessing information of this kind only where it is necessary to perform our roles.

SRV Team Members must not use or disclose confidential information unless authorised to do so and the use or disclosure is permitted by law.

SRV Team Members must not use confidential information for an improper purpose, or to obtain a personal benefit for themselves or others.

SRV Team Members shall ensure that unauthorised persons cannot access confidential and sensitive data and documents (including personal information about individuals). Papers are to be retained in secure storage when unattended. Computer screens are to be logged off when unattended.

The unauthorised disclosure of confidential data to external organisations can result in dismissal.

All SRV Team Members must read, sign and strictly adhere to the SRV *Confidentiality Agreement*.

D. Fair competition

As a Company, we are committed to achieving our competitive advantage through innovative, superior performance. We comply with all competition law requirements and do not engage in unethical business practices that limit or prevent competition.

E. Trading in SRV shares

SRV Team Members may have access to price sensitive information that has not been publicly released. It is a criminal offence for Team Members to trade, or procure others to trade, on such price sensitive information. It is also an offence to tip off someone who is likely to trade on that information.

SRV Team Members, especially Directors, Officers and Key Management Personnel, must comply with SRV's *Securities Trading Policy*.

F. Conflicts of Interest

When at work, SRV Team Members shall act in SRV's interests and not in a manner designed primarily to gain unfair advantage for themselves or other individuals. This particularly applies in areas such as the letting of contracts and the purchasing of goods and services. Team Members shall act with integrity when dealing with others.

SRV Team Members must either disclose or avoid situations in which there is a real or perceived conflict between personal interests and duties to SRV. Team Members must declare all conflicts of interest upon joining SRV and as new conflicts arise.

G. Involvement in other employment or business, including directorships

Full-time Team Members must obtain written approval before engaging in any other employment or business activity, including that of a family company.

Part-time and casual Team Members are entitled to work for other entities provided that management is informed of any possible conflict of interest that could adversely impact on SRV's financial position, services, clients or standing in the community. Where requested by management, a part-time or regular casual Team Member will provide details of any other employment.

Team Members must not engage in other employment, business activities or directorships, whether paid or unpaid, which may create a conflict of interest between personal interests and duties to SRV. The real or perceived conflict may not only be between personal objectives and SRV objectives, but may also be a conflict between the time and energy that a Team Member can devote to SRV because of his/ her outside business activities or directorships.

Regardless of whether there is a real or perceived conflict of interest connected with other employment, business activities or directorships, Team Members must disclose all outside activities upon joining SRV, and seek permission to undertake new outside activities from their manager before accepting the employment.

H. Media or public comment

Team Members must refrain from speaking to media unless authorised to do so, and refer all enquiries to either their General Manager or the CEO, as appropriate.

Team Members are only authorised to make public comments on behalf of SRV after obtaining permission from the CEO or SRV Board.

Team Members must not publicly discuss workplace activities, projects and practices nor disclose anything of a confidential nature.

I. Fair and safe work environment

As a Company, we value each individual and the contribution that each person brings to SRV. We embrace diversity and treat each other with respect and kindness.

In the performance of their duties, Team Members shall:

- Be courteous, sensitive and considerate to the needs of others and treat with respect the cultural, ethnic and religious differences of all other Team Members of SRV;
- Recognise legitimate authority of SRV management and not wilfully disobey or wilfully disregard any lawful order given by any person having the authority to make or give the order;
- Observe the highest standards of honesty and integrity and avoid conduct that could suggest any departure from these. This includes a duty to bring to notice dishonesty on the part of other Team Members;
- Ensure that their work is carried out efficiently, economically and effectively and that the standard of work reflects favourably on SRV;
- Undertake to be in the best possible mental and physical health to enable them to undertake their employment tasks at all times;
- Not seek to influence any person in order to obtain promotion or other advantage;
- Not wilfully discredit or cause embarrassment to the Team Members or stakeholders of SRV;
- Adhere to the Harassment and Bullying Policy;
- Ensure that, at all times, their work and behaviour is in adherence to all other Company Policies.

It is the responsibility of employers and employees to comply with the letter and spirit of State and Commonwealth Anti-Discrimination legislation. In general, such legislation prohibits discrimination on the basis of sex, age, marital status, pregnancy, the status of being a parent, childless or a de facto spouse, race, colour and national extraction, lawful religious or political industrial belief or activity, and impairment.

Team Members who comply with the requirements of this Code in terms of reporting unethical behaviour or wrongdoing, will not be discriminated against. All SRV's Team Members will assist in preventing bullying and harassment by adhering to the *Harassment and Bullying Policy* and the *Whistleblower Policy*.

J. Communications

Team Members are expected to communicate in a respectful and professional manner at all times whether verbally (in person or on the phone) or in writing (in formal correspondence, emails, instant messaging, or SMS). Team Members should be aware that their use of all SRV systems (including email and internet) is subject to internal surveillance and possible disclosure to regulators. Accordingly, Team Members should have no expectation of privacy regarding access to and use of SRV systems.

K. Use of Company resources

SRV property must be protected and used for legitimate SRV business purposes. Team Members should ensure that SRV resources, funds and/ or equipment are used effectively and economically in the course of their duties.

The use of SRV Internet, Intranet, email and computer systems (including storage) shall be strictly in compliance with the SRV *Computer, Email, Internet, Security & Social Media Policies*.

SRV property (including computers, telephones, other devices and network systems) must not be used to communicate or distribute inappropriate or offensive language or material.

L. Out of hours conduct

Outside of work hours and locations, Team Members continue to have a responsibility to meet the standards of professional and ethical behaviour required by SRV and not conduct themselves in a way that will negatively impact on SRV, its clients, its contractors, suppliers and the general public, where SRV or its clients are brought into disrepute. This includes, but is not limited to:

- criminal offences, such as stealing; and
- violence, bullying, harassment or discrimination towards work colleagues, clients or the general public.

M. Anti-bribery and corruption

Bribery is the offering, promising, giving, accepting or soliciting of an advantage as an inducement for action, which is illegal, unethical or a breach of trust. A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage.

Corruption is the abuse of entrusted power for private gain.

It is SRV's policy to conduct all of our business in an honest and ethical manner. We take a zero tolerance approach to bribery and corruption. We are committed to acting professionally, fairly and with integrity in all our business dealings and relationships, wherever we operate.

SRV will uphold all laws relevant to countering bribery and corruption in all the jurisdictions in which we operate. SRV will remain bound by the laws in Australia in respect of our conduct, and will apply these laws both at home and in all its global operations, irrespective of local custom.

Bribery and corruption are punishable for individuals by up to ten years' imprisonment and a fine. If SRV is found to have taken part in corruption, the Company could face an unlimited fine, be excluded from tendering for public contracts and face damage to our reputation. SRV therefore takes its legal responsibilities very seriously.

SRV's policy includes, but is not limited to:

- **Bribes-** any form of bribery, either directly or through any third party (such as an agent or distributor). Specifically, Team Members must not bribe a foreign public official anywhere in the world.
- **Gifts and hospitality-** Team Members should never solicit any gifts or benefits. Nor should they accept gifts or benefits for themselves or others, which might directly or indirectly compromise or influence them in their professional capacity. Clear guidelines are provided in the *SRV Gift Policy*.
- **Facilitation payments-** Facilitation payments are a form of bribery made for the purpose of expediting or facilitating the performance of a public official for a routine governmental action, e.g. processing papers, issuing permits and other actions of an official in order to expedite performance of duties of a non-discretionary nature (i.e. which they are already bound to perform). The payment or other inducement is not intended to influence the outcome of the official's action, only its timing. Facilitation payments, whether legal or not in a country, are prohibited under this Policy.
- **Political contributions-** SRV donates to political parties from time to time; individual donations must be approved by the CEO. SRV discloses political donations to the Australian Electoral Commission and State Electoral Authorities, as required.
- **Charitable contributions-** SRV encourages Team Members to support causes and charities of their choice. Charitable support and donations are acceptable in the community, whether of in-kind services, knowledge, time, or direct financial contributions. Team Members must be careful to ensure that charitable contributions are not used as a scheme to conceal bribery. SRV can only make charitable donations that are legal and ethical under local laws and practices.

N. Human Rights

SRV is committed to conducting our business in a manner that respects and advances human rights based on our values and operating principles. We uphold human rights at all times and in all locations, regardless of local business custom. In particular, we are committed to:

- Providing safe and secure conditions for those working on SRV's behalf
- Protecting the environment
- Following all applicable wage and hour laws
- Strictly prohibiting human trafficking and the use of child or forced labor, including prison or bonded labor
- Treating each other fairly and equitably

O. Financial Probity and Accountability

All Team Members have the responsibility to ensure that in all financial matters, including the handling of monies, there is full accountability in relation to any advice or transaction in which they may be involved. Team Members with responsibilities of a financial nature shall act in accordance with SRV's Finance Policies and shall observe the relevant legislative and regulatory requirements.

5 Grievance Procedures

Team Member concerns with any part of the Code of Conduct will be dealt with according to SRV's *Discipline and Grievance Procedures Policy*.

6 Breaches of the Code of Conduct

You must ensure that you read, understand and comply with this Policy. Breaches of this Code of Conduct are required to be reported to the SRV Board and the CEO.

Breaches of the Code of Conduct will be dealt with according to SRV's *Discipline and Grievance Procedures Policy*, and may also result in disciplinary action being taken by management that could include, among other actions, dismissal, notification to an external agency or criminal charges.

Contractors who engage in unacceptable behaviour may have their contract or engagement with SRV terminated or not renewed.

7 Review of the Code of Conduct

The Board will review this Code of Conduct annually to ensure it is operating effectively and whether any changes are required.

8 Publication of the Code of Conduct

A copy of this Code of Conduct is available on the Servcorp website www.servcorp.com.au.

Policies referenced in this Code of Conduct may be viewed at: www.servcorpcampus.com > The Library

Approved by the Servcorp Limited Board on 2 December 2020

Last reviewed on 6 December 2023

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