



Code of Conduct

Introduction

AccessAccom is committed to Human Rights while it pursues its business objectives. In order to achieve this, it is important that every employee conduct themselves with the highest ethical standards. This code of conduct (Code) is not intended to be exhaustive but sets out the minimum ethical standards expected of all employees of AccessAccom as well as AccessAccom's contractors, sub-contractors, agents and other personnel required to perform functions relating to any service of AccessAccom.

This Code forms part of the conditions of employment or contract in working for AccessAccom and a breach may lead to disciplinary action or the termination of a contract.

Application

This Code requires all AccessAccom directors, employees, contractors, sub-contractors, agents and other personnel performing work relating to any AccessAccom service to adhere to this Code, and for the purposes of interpretations of this Code, such persons will be deemed to be Employees.

Purpose

As well as assisting to discharge the legal and equitable duties of Employees, the purpose of this Code is to:

- articulate the high standards of honesty, integrity and ethical, responsible and law-abiding behaviour expected of Employees;
- guide the decision-making of Employees in all aspects of services delivered by AccessAccom
- guide Employees as to the practices necessary to maintain confidence in AccessAccom's integrity and comply with their legal obligations; and
- set out the responsibility and accountability of Employees to report and investigate any reported violations of this Code or unethical or unlawful behaviour.



While this Code is designed to ensure AccessAccom delivers on its commitment to acting ethically and responsibly and to sustainable business practice, it does not create any rights in any employee, client, customer, supplier, competitor, shareholder or any other person or entity.

Honesty and Integrity

AccessAccom's reputation as a good corporate citizen can only be achieved and maintained if Employees act with honesty and integrity in all dealings with AccessAccom's customers, suppliers, communities, government authorities, as well as work colleagues. Each Employee must:

- act honestly and fairly in all commercial dealings and conduct themselves with professional courtesy and integrity;
- perform their responsibilities with care, diligence and good faith;
- respect all people they have dealings with; and
- report any possible dishonest or fraudulent behavior of which they become aware in accordance with this Code.

Conflicts of Interest

Employees must avoid entering into situations where their personal, family or financial interests or duties to any third party may be in conflict with, or could reasonably be perceived to be in conflict with, the interests of AccessAccom or their duties and responsibilities to AccessAccom.

Employees should advise the Directors of any business interests or other employment (voluntary or paid) which may impact on their ability to perform their role at AccessAccom or give rise to a conflict of interest.

Employees may have a conflict of interest if the in the course of their employment or engagement with AccessAccom, including;

- any of their decisions lead to an improper gain or benefit to them or their associates; or



- their personal interests, the interests of an associate or relative, or obligation to some other person or entity, conflict with their obligations to AccessAccom .

Where any such conflict arises, as soon as reasonably practicable upon becoming aware of the conflict, the Employee must disclose this to their Manager or a Director.

Personal Gains, Gifts and other Payments

Employees must not accept payments, gifts or other kinds of reimbursement from a third party that could affect or appear to affect their objectivity in business decisions, or which may be seen as excessive beyond socially acceptable boundaries. As a guide, gifts with a value exceeding \$100 should not be accepted. Any gifts which are accepted should be recorded in the Gift Register maintained by the Company Secretary.

Employees must not improperly use their position, property or information acquired through their position for personal gain or the gain of an associate, or to compete with or harm AccessAccom, and must keep their personal or external business dealings separate from AccessAccom 's business dealings. Employees must only use goods, services and facilities received from AccessAccom in accordance with the terms on which they are given.

In addition, Employees must not accept commissions or payments which may be seen as constituting bribery or fraud, or participate in corrupt business practices.

Professionalism and The Work Environment

In addition to acting ethically, AccessAccom seeks to continually improve the quality of the work of its Employees and their work environment. To achieve this, Employees must:

- attend for work as required and on time in accordance with their ordinary working hours and days unless absence is notified with reasonable reason ;
- ensure that their appearance is neat, clean and appropriate for their particular area of work;
- strive to deliver exceptional work and service to AccessAccom 's customers;



- treat work colleagues, clients, contractors and other stakeholders with respect, and do not discriminate on the grounds of a person's race, gender, religion, marital status, sexual preferences, disability or other attribute recognised by relevant State and Federal Discrimination legislation;
- not tolerate or participate in harassment, including sexual harassment or offensive language, or any form of bullying or victimisation;
- Use company resources and equipment in a responsible manner and not be wasteful or excessively use company resources for personal purposes.
- Not use company equipment for gambling, accessing pornography, or for racist or other illegal purposes.
- Keep full, accurate and up to date records of all activities relating to clients, tenants, applicants, contractors, employees or any other material matters in the relevant record keeping systems or files.
- Ensure good value for money when procuring any goods and services on behalf of AccessAccom
- Not make any public comment in media, social media or other publications without the prior consent of the Managing Director.
- not attend for work and/or perform any work task if they are under the influence of alcohol or drugs; and
- cooperate with others in the workplace to create a safe and healthy workplace in accordance with any applicable WHS Policy.

Respect for Human Rights

AccessAccom supports and respects the protection of human rights within its sphere of influence, in particular, supports effective elimination of compulsory labour and child labour, and it will make this a criteria in the choice and management of its relationships with suppliers and sub-contractors.



Community Relations

AccessAccom is committed to making a positive social contribution to the communities in which it operates.

Safety

AccessAccom is committed to providing and maintaining a safe work environment. It is the responsibility of each employee and Directors to familiarise themselves with, and adhere to, each Occupational Health and Safety policy that is applicable to their field of employment within AccessAccom.

Communications And Privacy of Data

AccessAccom is committed to open and transparent communications within the confines of confidentiality and privacy. Employees must respect the privacy of information relating to individual persons (whether employees or third parties) which they hold or handle as part of any information processing activities. Employees must not, without proper authority, access modify, disclose, or make use of any confidential, commercial and/or personal information for any purpose other than for authorised and necessary work purposes and must ensure they familiarise themselves with, and comply with the privacy laws of Australia (or where applicable, the jurisdiction of their business unit).

Employees must otherwise deal with such information in accordance with AccessAccom 's Privacy Policy.

Confidentiality

Any information acquired by Employees while performing their duties is confidential information of AccessAccom, its customers or suppliers and must be kept confidential. Directors must not disclose the information to a third party except where that disclosure is;

- authorised by the Directors; or
- required by law or a regulatory body.

The existence and details of any Board and company management information, discussions, and decisions that are not publicly known and



have not been approved by Management for public release, are confidential information of AccessAccom and subject to this Code.

Compliance with Law and Policies

AccessAccom respects the law and is committed to the adherence to all applicable laws and regulations and to not breaching any applicable law or regulation. Each Directors and employee must comply with the letter and spirit of any applicable law, this Code and any applicable policies and guidelines of AccessAccom and not knowingly participate in any illegal or unethical activity.

Breach of This Code

AccessAccom emphasises the need for all Employees to comply with the requirements of this Code. Any Employee found to be in breach of the requirements of this Guideline may be subject to disciplinary action, up to and including termination of employment.

This Code is a best practice procedure and does not create any binding obligations on AccessAccom or contractual rights for Employees. AccessAccom may vary the Code from time to time at its discretion.

Reporting of Unlawful and Unethical Behaviour (Whistleblowing)

AccessAccom expects Employees to report (in good faith) any actual or suspected violation of this Code of Conduct, any of AccessAccom's policies or any behaviour that is illegal, unethical, fraudulent or deceptive by Employees and to encourage others to do the same. Employees may use their own judgment in deciding to whom to report any Reportable Behaviour, however Directors are encouraged to report to another Director and employees are encouraged to report to their immediate manager or the Directors.

A person to whom a report is made of Reportable Behaviour must ensure that a proper and thorough investigation is conducted; that any person the subject of an investigation is given a reasonable chance to respond to allegations (ensuring confidentiality of the reporting person is preserved); and that appropriate disciplinary action is taken if the allegation is substantiated.

If an Employee (Reporting Person) reports Reportable Behaviour in good faith, each Employee must ensure that the Reporting Person's



position of employment is protected; that their identity is only disclosed with their consent (except where disclosure is required by law); and that no disciplinary or discriminatory action is taken or tolerated against the reporting person for reporting the violation.

The Reporting Person is not protected from civil or criminal liability for any of his or her conduct that may be revealed by an investigation, however in some cases the fact the Reporting Person has made a report may be taken into account as a mitigating factor when determining actions that may be taken against him or her.

The Corporations Act 2001 (Cth) (Act) provides additional protections in relation to the reporting of a possible contravention of the Corporations legislation.