



TRAVIS
P A R T N E R S

Code of Conduct

Alfabs Australia Limited ACN 674 455 442 (**Company**)

Code of Conduct

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Code of Conduct

1 Introduction

The Code of Conduct (**Code**) sets out the way the Company and its subsidiaries (**Group**) conducts its business. The Group will carry on its business honestly and fairly, acting only in ways that enhance the Group's reputation and in strict compliance with all laws and regulations.

The purpose of this Code is to guide the behaviour of all Group employees, contractors, consultants, managers and the Board, including temporary employees, contractors and directors) (collectively, **Personnel**).

All directors, senior executives and employees are required to understand and comply with their obligations under this Code.

This Code will be made available to Personnel in the corporate section of the Company's website.

2 Responsibilities

The Board is responsible for the contents of the Code and its periodic updating.

The Chief Executive Officer (**CEO**) and managers at all levels of the Company are responsible for ensuring that all Personnel understand and follow this Code.

Each Personnel is responsible for adhering to this Code, both in detail and in spirit. Everyone must:

- (a) act in accordance with the Company's values and best interests of the Company;
- (b) act with integrity;
- (c) not engage in bullying, harassment, discrimination or other forms of detrimental conduct;
- (d) disclose and manage any conflicts between the Company's interests and their personal interests;
- (e) protect the Company's business assets;
- (f) not take advantage of the property, information or their position within the Company, its customers, or its suppliers for personal gain or to cause detriment to the Company, its customers, or its suppliers; and
- (g) report breaches of this Code to an appropriate person within the Company.

It is the responsibility of all Personnel to ensure ethical conduct is recognised and valued throughout the Company.

Individuals or organisations contracting to, consulting for, or representing the Company must comply with this Code in the same way as Personnel. Personnel who engage contractors or consultants should provide them with a copy of this Code.

3 Compliance with law

The Company will only conduct business by lawful and ethical means. Personnel at all levels must keep themselves informed on legislative changes and comply with all legal responsibilities.

Depending on their individual responsibilities, Personnel should be familiar with and work within the requirements of all laws and regulations relevant to the Company and its business, as well any of the Company's internal policies. If Personnel do not understand their responsibilities and the Company's obligations, they must seek guidance from their manager or a member of the Company's human resources department (**Human Resources**).

4 Conflicts of interest

Personnel must avoid any situations involving divided loyalty or a conflict between their personal interests and those of the Company. Personnel faced with conflicting interests must report it to their manager or Human Resources.

In particular:

- (a) Personnel and any organisation in which they or their family have a significant interest must not compete with, or have business dealings with the Company;
- (b) Personnel must not work or consult for, or have any other key role in, an outside business organisation which has dealings with the Company or is a competitor of the Company;
- (c) Personnel must not enter into any arrangement or participate in any activity that conflicts with the Company's best interests or is likely to negatively affect the Company's reputation;
- (d) Personnel must not use the Company's assets for any purpose other than for the Company's business purposes or interests;
- (e) Personnel must not make improper use of their employment with the Company, their position or role, or information obtained because of their position, to gain an advantage for themselves or anyone else, to the Company's detriment; and
- (f) Personnel must not trade in Company securities when they are aware of price sensitive information which has not been disclosed to the Australian Securities Exchange. All Personnel must read and follow the Company's Securities Trading Policy.

The Company supports involvement of its employees in community activities and professional organisations. However, outside employment or activity must not conflict with Personnel's ability to properly perform their work for the Company, nor create a conflict or perceived conflict of interest.

Before accepting outside employment or a position on the board of directors of another company or non-profit organisation, you must carefully evaluate whether the position could cause, or appear to cause, a conflict of interest and if so, report it to your manager or Human Resources and seek consent.

5 Change of Control

Personnel must be particularly careful to avoid conflicts of interest and the improper disclosure of confidential information in the case of an approach by a third party in relation to the proposed acquisition of the shares in, or any of the businesses of, the Company.

The Board must be immediately informed of any approach (no matter what the form of the approach) and will establish protocols for the Company's response.

6 Company's assets

The Company's assets and particularly, its intellectual property, are integral to its core business. All Personnel must use their best efforts to protect the Company's assets and other resources including valuable property such as confidential information and intellectual property (including trademarks, registered designs and copyrighted material) from loss, theft and unauthorised use.

The use of Company time, materials, or facilities for purposes not directly related to the Company's business, or the removal or borrowing of Company property without permission is prohibited.

7 Confidentiality

Information that the Company considers private and that is not generally available to the public (**Confidential Information**) and information that the Company owns, develops, pays to have developed or to which it has an exclusive right (**Proprietary Information**) must be treated by Personnel as follows:

- (a) Personnel must not make improper disclosure, including inadvertent or careless disclosure, of business strategies and plans, special methods of operation and other information that is confidential to or of competitive value to the Company to any third party or other Personnel who does not have a valid business reason for receiving that information, unless:
 - (i) allowed or required under relevant laws or regulation; or
 - (ii) agreed by the person or organisation whose information it is; and
- (b) if Confidential Information or Proprietary Information is required to be provided to third parties or other Personnel for valid business purposes, Personnel must:
 - (i) take adequate precautions to seek to ensure that information is only used for those purposes for which it is provided and it is not misused or disseminated to the Company's detriment; and

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- (ii) take steps to ensure that the information is returned or destroyed when the purpose is complete.

These obligations continue to apply to Personnel after their employment or engagement ceases. All Personnel should refer to the specific provisions of their employment, contractor or other engagement agreement with the Company.

8 Public communications and disclosures

Media statements, responses to questions from any journalist, investor, stockbroker or financial analyst and official announcements may only be made by persons authorised in accordance with the Company's Continuous Disclosure and Communications Policy. It is imperative that all Personnel comply with this policy to ensure the Company's compliance with its disclosure and communication obligations under the *Corporations Act 2001* (Cth) and the ASX Listing Rules.

Unless the Chief Executive Officer has given prior written consent, all Personnel and associated parties must not participate in public forum communications or discussions (including internet-based forums and social media) where the subject matter is related to the Company, its competitors, or any industry in which the Company operates.

9 Gifts, gratuities and entertainment

The Company does not permit or tolerate giving or taking bribes, kickbacks or gratuities or any other payments or promises for favourable treatment or as an inducement for doing business. Personnel should refer to the Company's Anti-Bribery and Corruption Policy to understand their full obligations.

10 Integrity in financial reporting

The Company is committed to providing accurate, timely and clearly understandable disclosures in reports on its results to shareholders, the Australian Securities Exchange, Australian Securities and Investments Commission and other regulators.

Personnel responsible for the preparation of such reports are responsible for the integrity of the information contained in, or which forms the basis, such reports and are expected to exercise the highest standard of care in preparing materials for public communications.

11 Workplace conduct

The Company is committed to the fair and equal treatment of all its Personnel and abides by the employment laws of the countries in which it operates. Personnel and candidates for employment or engagement shall be judged based on their behaviour and qualifications to carry out their job without regard to race, gender, religion, sexual orientation, disability, age, marital status or political belief or any other aspect protected by law.

The Company does not tolerate bullying, harassment or discrimination of any kind whatsoever and all Personnel should refer and adhere to the Company's Diversity Policy and other employee policies relating to the treatment of others.

12 Legal actions

Any actual, proposed, or threatened legal action against the Company or Personnel must be notified to a senior manager or the Board as soon as becoming aware of such an action.

Any actual, proposed, or threatened legal action by the Company or Personnel on behalf of the Company against another party must be approved in advance by the Chief Executive Officer.

13 Compliance

Any Personnel who knows or suspects on reasonable grounds a breach of this Code either has occurred, is occurring or might occur should report that information to:

- (a) an officer or senior manager of the Company;
- (b) a senior member of Human Resources; or
- (c) the Whistleblower Protection Officer in accordance with the Company's Whistleblower Protection Policy.

All reports will be treated confidentially to the extent possible having regard to any applicable laws.

14 Reviews and changes to this Code

The Board, in conjunction with the Audit and Risk Management Committee, will review this Code periodically to ensure that it is operating effectively and whether any changes are required.

The Board may change this Code from time to time by resolution.

Adopted by the Board on 12 April 2024.