

## PURPOSE

The SPC Group Employee Code of Conduct outlines our commitment to maintaining a safe, inclusive, and professional working environment free of discrimination, bullying, harassment, and sexual harassment.

This Code establishes the conduct and behavioural standards expected from all members of our business. It is guided by our values and legal principles.

Additionally, it reflects the expectations placed on us by our customers, suppliers, the community and regulators.

## MESSAGE FROM THE CEO AND CHAIRMAN

How we conduct ourselves in our work and interactions, both internally and with customers and suppliers, is fundamental to the success of our operations as we continue to expand globally.

We take pride in upholding principles of gender equality, diversity, inclusion, and maintaining a respectful workplace environment. We expect the same commitment from you.

At SPC Group, we set high expectations for our employees, requiring them to consistently demonstrate the highest standards of professional and personal conduct while serving customers, stakeholders, and interacting with colleagues.

Our core values and associated behaviours serve as the cornerstone of everything we do. We anticipate that everyone will embody the SPC Values and adhere to this Code of Conduct, as these principles hold significant meaning for us. We expect the same level of dedication from you.

Take a moment to read through the following Code of Conduct and let it guide your actions and behaviour

## SPC VALUES

Our Code is built on our values of:

- People & Safety first
- Better Together
- Accountability & Integrity
- Embrace Innovation

## DEFINITIONS

**Direct bullying** occurs between the specific people involved.

**Discrimination** occurs when a person is treated less favourably or harassed in certain areas of public life including their employment because of a personal characteristic or prescribed attribute that is protected under law including but not limited to race, gender, or sexuality.

**Harassment** occurs where a person engages in uninvited or unwelcome behaviour which a reasonable person would expect would cause another person to be offended, humiliated, or intimidated. It does not matter if the person who committed the act intended, or did not intend, to upset or cause offence to the other person.

**Indirect bullying** involves third parties participating in bullying behaviours, for example passing on insults or spreading rumours. Indirect bullying mostly inflicts harm by damaging another's social reputation, peer relationships and self-esteem.

**Sexual Harassment** refers to the definition as provided by the Sex Discrimination Act 1984 (Cth) 'any unwelcome conduct of a sexual nature that a reasonable person, having regard to all the circumstances would have anticipated would offend, humiliate or intimidate the other person.'

**SPC Group** or **SPC** refers to SPC Global Ltd (ACN 633 389 394) and its subsidiaries.

**SPC Group Employees** refers to all individuals working for the SPC Group, at its direction, or on behalf of the SPC Group, including team members, directors, and contractors, regardless of their location or employment status, be it full-time, part-time, fixed-term, seasonal, or casual.

**Workplace Bullying** is any behaviour where a person or group of people repeatedly act unreasonably towards others, where the behaviour creates a risk to health and safety and is unlawful. Bullying may include aggressive behaviour, teasing or practical jokes, pressuring someone to behave inappropriately, excluding someone from work-related events, or unreasonable work demands.

## SCOPE

This Code applies to all SPC Group Employees and all persons who work at the direction of, or on behalf of SPC (including agents, contactors, subcontractors, consultants and temporary staff).

## COMPLIANCE WITH THE CODE

We take compliance with the Code very seriously. Any suspected breaches will undergo a thorough investigation, and if found guilty of violating the Code, you may face disciplinary action, including the possibility of termination of your employment.

In cases of very serious breaches, individuals involved, or even the SPC Group itself, may face civil or criminal legal consequences. Additionally, failure by contractors or business partners to adhere to the Code may result in the termination of their relationship with the SPC Group.

Any forms of sex discrimination, sexual harassment, the creation of a hostile working environment, victimization, direct or indirect bullying, or harassment occurring at SPC Global workplaces will not be tolerated.

## HOW TO RAISE A CONCERN OR SEEK GUIDANCE

We all have a responsibility to speak up when we have observed conduct that may be in breach of this Code or other SPC Group's Policies.

You can report a matter to the Stopline Hotline by calling or emailing:

- Email: [spc@stopline.com.au](mailto:spc@stopline.com.au)
- Phone: 1300 30 4550

- Website: [www.spc.stopline.com](http://www.spc.stopline.com)

The Stopline Hotline is an independent and confidential reporting service available 24 hours a day, 7 days a week. You can contact the Stopline Hotline to make a report in multiple language.

Identifying yourself when making a report is helpful as it facilitates feedback and aids in investigating misconduct. However, you may also choose to report suspected misconduct or ask questions anonymously.

A report can also be submitted to SPC's Protected Disclosure Officer by post to Suite 4, Level 1, 3 Bristol Street, Essendon Fields, Victoria 3041, marked to the attention of SPC's Protected Disclosure Officer.

Additionally, you may raise a report by contacting the following company officers:

- SPC General Counsel:
- SPC Chief Financial Officer
- SPC Company Secretary:

The SPC Team thoroughly reviews all reports of misconduct and ensures that any behaviour potentially violating the Code, SPC policies, or the law is investigated by the appropriate function, depending on the nature of the report. All reports will be subject to a fair, objective, confidential, and timely investigation by SPC Group.

After submitting a report, an investigator may contact you to gather additional information. Whenever possible, updates regarding the investigation's status will be provided. However, please note that, due to privacy concerns, information about the investigation's outcome may not be disclosed.

For details on how SPC Group addresses complaints related to breaches of the SPC Group Employee Code of Conduct, please refer to SPC's Grievance Policy and Procedure. Additionally, the Whistle-blower Protection Policy discloses how the report will be investigated, ensuring protection from retaliation for the reporting individual.

## NO RETALIATION

SPC Group Employees, including SPC Group directors and the Senior Management Team, are prohibited from engaging in any form of retaliation against individuals who report a genuine or suspected breach of the Code or any SPC Group Policy or Standard.

All reports of misconduct must be made in good faith. Intentionally filing false or misleading reports, like any other misconduct, will result in disciplinary action, up to and including termination of employment

## SPC GROUP EMPLOYEES' RESPONSIBILITIES AND EXPECTATIONS

All SPC Group Employees must and are expected to:

- Respect the rights of others.
- Act with honesty and integrity.
- SPEAK UP if misconduct or unethical behaviour is witnessed.

- Understand and comply with this Code, SPC Group's policies and procedures, and all applicable laws related to your work at SPC.
- Refrain from engaging in unlawful behaviour, such as:
  - Discrimination on the grounds of sex.
  - Sexual harassment.
  - Sex-based harassment.
  - Conduct creating a hostile workplace environment.
  - Direct or indirect bullying or harassment.
- Exercise good judgment and think before acting.
- Promptly complete all assigned training on the Code and other compliance-related topics.
- Fully cooperate when responding to an investigation or audit.
- Never engage in or tolerate retaliation against anyone bringing forward a concern or question.
- If in doubt, ask for guidance and seek clarity.

## All People Leaders must and are expected to:

- Lead by example, modelling ethical, respectful and legally compliant behaviour for the team.
- Foster an environment where team members feel comfortable engaging in truthful and authentic conversations.
- Ensure team members can raise concerns without fear of retaliation.
- Be visible in their commitment to safe, respectful and inclusive workplace that value diversity and gender equality.
- Help the team understand their responsibilities under the Code, company policies, and laws; seek guidance when needed.
- Create opportunities to discuss the Code and emphasise the importance of ethics and compliance.
- Highlight that how results are achieved is as crucial as the results themselves.
- Operate with empathy, actively listening to the team, and supporting those who raise questions or concerns.

## SPC GROUP COMPANY STANDARDS

### Respect, human rights, inclusion and safety

SPC is dedicated to fostering inclusion, equity, and equal employment opportunities, aiming to establish a workplace that is free from discrimination, harassment, sexual harassment, bullying, or victimization. Allegations of conduct contradicting these principles will be promptly investigated and addressed. Ensuring a healthy and safe workplace is paramount at SPC. The company maintains a zero-tolerance policy towards employees or other workplace participants being under the influence of or impaired by alcohol or illegal drugs. SPC Group Employees are required to inform their manager if they are taking prescription or over-the-counter medication that could impact their ability to perform their role safely. For additional details, employees should refer to SPC's Drug and Alcohol Policy.

We do not tolerate unlawful discrimination, bullying, harassment or other unacceptable conduct and we make employment decisions based on merit and performance.

You are expected to report any unlawful discrimination, bullying, harassment or other unacceptable conduct you observe. If you are concerned about sexual harassment in your workplace, raise concern or seek guidance as described in this Code.

SPC expects you and all those we work with to respect human rights and to maintain a work environment where this is understood and valued.

We are committed to ensuring that our operations and supply chains do not engage in modern slavery practices. We are also committed to acting as quickly as practicable to remedy any human rights violations that are reported to or identified by us, including exploitative labour practices.

## Antibribery and corruption practices

SPC Group Employees must not offer or accept bribes, kickbacks, or similar payments, including any irregular payment to win business or influence a business decision in SPC's favour.

This also applies to consultants, contractors, intermediaries or business partners dealing with or on behalf of SPC. A bribe may be in the form of cash, gifts, entertainment, secret commissions, or other benefits. Our anti-bribery policy specifically prohibits facilitation payments even where they are legal in the country in which they are paid.

It is acceptable only for authorized SPC representatives to express our views to federal, state, and local governments on subjects that affect our interests and operations. This must be done with the highest standards of ethics and in accordance with the law. Any political donations must be authorized by the SPC Group Board of Directors.

## Gifts and entertainment

We recognise that you may give or accept gifts, entertainment and hospitality in the course of your work for SPC, but you must ensure these are appropriate. They should be of only moderate value and not give rise to any perceived or actual conflict of interest, or undue influence.

'Moderate' can vary depending on the circumstances but, as a general guide you are required to declare and record all gifts and entertainment valued at or above \$100 in accordance with our Anti-bribery Policy.

## Using SPC resources and technology

SPC Group Employees must adhere to SPC's policies and procedures for responsible usage and care of company resources. You cannot use SPC resources for personal gain or purposes, nor should you allow others to do so. Furthermore, you must not use your position for personal enrichment or facilitate the enrichment of others through the deliberate misuse of SPC's resources or assets.

SPC's technology must only be used for legitimate business activities by authorised individuals. Access to, and use of, SPC technology must be responsible, professional and in compliance with the Code and SPC policies.

You must ensure that any use of social media and networking sites is in accordance with our Code of Conduct and relevant IT and Social Media policies.

## Conflict of interest

SPC Group Employees must refrain from engaging in activities that create, or appear to create, a conflict between personal interests and the interests of SPC.

Conflicts of interest can manifest in various situations, and the line between personal and professional interests may easily blur. To effectively manage conflicts of interest, it is essential to disclose any real, potential, or perceived conflicts to the appropriate individuals, including your line manager and People and Culture contact. If necessary, they may involve the General Counsel, the Company Secretary, or the CEO to determine the best course of action in managing the conflict of interest.

Approval is required for engaging in any work outside SPC, including business ventures, directorships, partnerships, paid speaking engagements, or other activities with the potential to create a conflict of interest.

If any conflict cannot be effectively managed or resolved, you must take action, satisfying SPC's requirements to eliminate the conflict.

## Environment

SPC is committed to operating in an environmentally responsible and sustainable manner and identifying risks to the environment that may come about through its operation.

By conserving energy, reclaiming and recycling water, we work across our business to carefully steward earth's resources. We are committed to complying with all applicable laws and regulations relating to protection of the environment and strive for continuous improvement.

## Confidential Information and Privacy

Confidential Information and company Data hold significant value for SPC. All SPC Group Employees are obligated to safeguard non-public SPC information. This includes refraining from disclosing confidential company details such as research and development activities, sales and profit reports, marketing plans, manufacturing processes, potential acquisitions or investments, and/or prices paid for supply, as well as other trade secrets.

We acknowledge and uphold the personal privacy of employees, customers, suppliers, and others with whom we interact. Personal information is collected and processed for business purposes in a lawful and transparent manner. We implement reasonable measures to ensure the security of records containing personal information and ensure their proper maintenance.

## Create and Maintain Accurate Records

Accurate recordkeeping and reporting are crucial for maintaining SPC's reputation and credibility.

SPC Group Employees must ensure that the business information they record is honest, accurate, and timely. All financial records must accurately reflect SPC's transactions and adhere to generally accepted accounting standards and finance policies. The use of undisclosed funds and transactions is strictly prohibited. All business records and documents must be truthful, accurate, and complete.



## Competition and Consumer Law

Compliance with competition and consumer law is essential to maintaining our integrity and good reputation, and ensuring we are not exposed to potentially significant penalties for contravention. We support the law's intention to promote and maintain fair and open competition, protect consumers by providing them with accurate information, and be fair where there is unequal bargaining power. We respect consumers by providing accurate information, acting in a fair manner in our business dealings, and acting independently of our competitors.

You should actively comply with these laws. If you are in a management or marketing role, you are required to undertake regular training in this area. If you are unsure about any matter in relation to competition and consumer laws, raise it with the Legal Department.

## Law and regulations

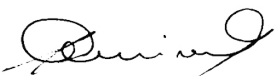
At all times, SPC Group Employees must ensure to understand the laws, regulations and industry practices that are relevant to your work and keep up to date with changes in the body of knowledge and the professional and ethical standards relevant to their area of expertise.

## RELATED POLICIES

This code should be read in conjunction with other important policies which are relevant to upholding the Code, including those referenced below:

- Anti-Bribery and Corruption Policy
- Competition and Consumer Law Policy
- Privacy Policy
- Social Media Policy
- Grievance Policy and Procedure
- Whistle-blower Protection Policy
- Drug and Alcohol Procedure
- Human Rights Policy
- Supplier Code of Conduct Policy
- Diversity and Inclusion Policy
- Workplace Respect Policy
- Managing Performance & Conduct Policy

Approved by Neil Brimacombe



Chief Executive Officer

19 July 2024