


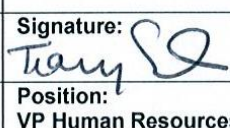
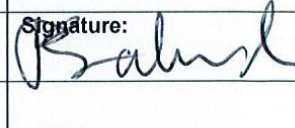
# QUICKSTEP TECHNOLOGIES Pty Ltd

## CODE OF CONDUCT

### QS-HRD-009

**Scope of Validity: Quickstep Technologies Pty Ltd**

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## Purpose

The purpose of this procedure is to define the standards of behaviour for employees, contractors and managers, in the performance of their duties. The following principles embody the Code of Conduct:

- To act with integrity and professionalism in the performance of their duties and be scrupulous in the proper use of Quickstep information, funds, equipment and facilities;
- To edify the company and colleagues when dealing with customers, visitors, suppliers and shareholders
- To exercise fairness, equity, proper courtesy, consideration and sensitivity in all their dealings in the course of carrying out their duties; and
- To avoid real, apparent or perceived conflicts of interest.
- To increase shareholder value within an appropriate framework that safeguards the rights and interest of the Company's shareholders, and the financial community.
- It is the responsibility of directors, managers, employees and contractors to understand that the Company Code of Conduct also applies to the adherence to formal policies, procedures and systems of control and accountability which the Company has in place as part of its corporate governance.

## Scope

The scope of this procedure is to define the Quickstep Code of Conduct as guiding principles ratified by the Board of Directors for Quickstep for all directors, managers, employees and contractors at Quickstep to strive towards when dealing with each other, shareholders and the broader community.

## Definitions and Acronyms

Refer to:

QS-LIS-001 Definitions

QS-LIS-002 Abbreviations and Acronyms

QMS - Quality Management System

Quickstep - For the purposes of this document Quickstep refers to Quickstep Technologies Pty Ltd and Quickstep Holdings Limited. The term Company can be interchanged with Quickstep.

Employees - means all employees of Quickstep whether or not in a casual, full / part time, temporary or permanent capacity.

## Employee Code of Conduct

Directors, Managers, Employees and Contractors are required to:

- 1.1 Deal with the company's customers, suppliers, competitors and each other with the highest level of integrity and to observe the rule and spirit of the legal and regulatory environment in which the company operates
- 1.2 Perform their duties with skill, honesty, care and diligence, using authority in a fair and equitable manner;
- 1.3 Comply with all applicable laws and regulations;
- 1.4 Report any breaches or suspected breach of all applicable laws and regulations;
- 1.5 Abide by policies and procedures, instructions and lawful directions that relate to their engagement and duties;
- 1.6 Ensure that they take reasonable care to ensure their own safety and health while at work and to avoid adversely affecting the safety and health of others;
- 1.7 To comply with the Company's environmental policies;
- 1.8 Provide accurate information, give prompt attention and not discriminate on any unlawful grounds when dealing with people in the course of their duties;
- 1.9 Not harass, bully or intimidate any other person, either directly or indirectly, while at work or otherwise representing the Company;
- 1.10 Treat all people they deal with in the course of their employment with sensitivity and courtesy;
- 1.11 Comply with the Company's obligations under competition law;
- 1.12 Maintain accurate records, including accounting, regulatory compliance, , quality system related documentation and petty cash.
- 1.13 Retain documents and other records required for audit, compliance and regulatory approval and other valid reasons for the appropriate time periods
- 1.14 Behave in a manner that maintains or enhances the reputation of the company and its subsidiaries;
- 1.15 Ensure dress and personal appearance is appropriate for the performance of their duties, including where safety standards specify.

This Code of Conduct specifically addresses the critical areas where employees, Contractors and managers may, at various times interact with, or on behalf of the business. These criteria include but are not limited to the following matters.

### Conflict of interest

Any personal, financial or other interest which may represent an actual potential or perceived conflict must be disclosed by the employee and/or contractor and discussed with their Manager, or the Chief Executive Officer to avoid a conflict of interest occurring.

A conflict of interest arises when an employee, contractor or director has a direct or indirect interest in a property, investment or transaction in which the employee or contractor knows or believes that the company has an interest. An indirect interest includes but is not restricted to:

- an interest of a member of an employee's family;
- an interest of a corporate entity associated with the employee or contractor or their family.
- an interest in any other legal entity associated with the employee or contractor or their family.

A conflict of interest may include any of the following or a combination of them:

- actual – when the interest is known to exist;
- potential – when the interests are believed to be under consideration or discussion; and
- perceived – when the existence of the interests would cause adverse comment if publicised outside Quickstep Technologies Pty Ltd, whether or not the conflict is actual or potential.

Where a real or apparent conflict of interest arises the matter should be brought to the attention of :

- (a) the Chairperson in the case of a board member
- (b) the CEO / Managing Director in the case of the management team
- (c) a supervisor in the case of an employee

so that the matter may be dealt with in the appropriate manner

## Confidentiality

At all times directors, managers, employees and contractors are required to adhere to Federal Privacy Amendment Act (2000) which prescribes a number of Federal privacy principles which apply to how the company operates with regard to personal information.

Information can be collected by lawful and fair means if necessary for a legitimate business or operational requirement or activity. Employees, contractors and customers will be made aware of their rights in relation to the collection, use and disclosure of the information.

It is expected that at all times directors, managers, employees and contractors will treat the information that becomes known to them for a specific legitimate purpose, or through the course of their work, including their own financial information, with an appropriate level of confidentiality and respect.

For further information related to National Privacy Principles please contact Human Resources.

### 1.16 Use of information

Employees and Contractors of Quickstep must not use or disclose information, including strategic business, trade, commercial or personal information deemed confidential, obtained through their employment with the company, to anyone including but not limited to customers, competitors or other employees other than in the proper conduct of their duties. If unsure, contractors and employees must discuss the matter with their manager, or Chief Executive Officer respectively.

Information obtained at work should not be used to obtain financial reward or gain other benefit, or to take advantage of another person on the basis of information held in Quickstep records. All documentation stored electronically, or in any other form, is the property of Quickstep unless otherwise agreed.

### 1.17 Insider trading

All employees and contractors of Quickstep shall ensure that all transactions in Quickstep securities comply with Australian Corporations Law, Regulations (particularly the insider trading regulations) and the Quickstep Insider Trading Policy.

Insider trading is the exploitation for personal gain of privileged information, which, if publicly available, could affect the market price of Quickstep shares or other securities. Insider trading is illegal. Employees and contractors shall not buy, sell or redeem Quickstep securities whilst they possess privileged market sensitive information. If an employee or contractor is unsure whether an activity is, or could be perceived as, insider trading, they should discuss the matter with their Manager or the Chief Executive Officer / Managing Director.

Please contact the Chief Financial Officer for further information about trading in Company Securities.

## Using Quickstep property, money, goods or services

Quickstep property, funds, facilities and/or services should be used efficiently, economically and for authorised purposes only and be in accordance with designated financial authority (DFA).

## **Inventions or Documentation**

Any documentation, invention, design, improvement or idea (usually known as “intellectual property”) connected with or related to the business of Quickstep developed by an employee or contractor during or a result of their employment is, and remains, the sole property of Quickstep, (including the exclusive right to copyright, use, adapt, patent and/or register such) unless otherwise agreed by the Chief Executive Officer.

Such documentation, invention, design improvement or idea must not, without authorisation, be divulged or released to, or for use by, anyone not employed by Quickstep. Nor may it be divulged or released to any person who has no need for such information other than in the proper performance of their duties for Quickstep.

An employee must promptly disclose to their Manager, or the Chief Executive Officer any documentation, invention, design, improvement or idea connected with or related to the business of Quickstep developed outside of working hours during their employment with Quickstep. The Chief Executive Officer will determine the action to be taken in relation to any such disclosure.

## **Use of official position**

Employees or contractors must not use their position to seek or obtain any financial or other advantage for themselves (other than in accordance with their engagement), their family or any other person or organisation. Nor is an employee, contractor or director permitted to use their position to harass or disadvantage another person.

## **Making statements about official matters**

Employees or Contractors must not disclose information about or belonging to Quickstep which is not public, or make public comment in respect of Quickstep, directly or indirectly, without the prior approval of their of the Chief Executive Officer. No statements should be made as a private citizen, on an official matter relating to Quickstep via the media.

All requests for comment should be referred to the Chief Executive Officer.

## **Giving and/or Accepting gifts, gratuities or other benefits**

Employees or contractors are not permitted to give and/or accept gifts, gratuities, entertainment or other benefits related to the performance of their duties with a value in excess of AUD\$250 without the approval of their Manager or the Chief Executive Officer.

## **Working for other organisations and/or conducting business**

Employees working for another organisation or conducting a business is not permitted without the prior written permission of their Manager or the Chief Executive Officer. Permission will be granted where the Manager or the Chief Executive Officer is satisfied that working for one’s own business or another organisation is not likely to lead directly or indirectly to a conflict of interest or to unsatisfactory performance. The Company will not unreasonably withhold approval for an employee to undertake external paid work.

An employee must not canvass or conduct non-Quickstep business during working hours, whilst working for the company, without the prior written permission of their Manager or the Chief Executive Officer.

## Equal Opportunity and Harassment

All employees and contractors must be aware of QS-HRD-005 Equal Employment Opportunity and Harassment and the responsibility it places on employees to respect the rights of individuals. Directors, managers, employees and contractors must not discriminate against, bully or harass, directly or indirectly, any person in the course of their employment.

Quickstep provides equal employment opportunity to all employees and applicants without regard to race, colour, religion, sex, age, child-bearing age / pregnancy, disability, marital status, sexual orientation, gender identity or breastfeeding.

Freedom from discrimination includes freedom from any form of harassment based on a person's race, religion, sex, sexual orientation, marital status, family status, pregnancy, age, disability, gender or nationality.

For further information regarding equal opportunity and harassment please contact your manager or Human Resources.

## Safety and Environment

Employees and contractors must cooperate and comply with Quickstep Health & Safety policy. This will ensure that the health and safety of others is not endangered.

Employees and contractors must undertake safety training where required, avoid and prevent the misuse of safety and first aid equipment, wear safety clothing where provided, and report hazards, accidents, injuries and unsafe practices

The definition of work place hazards includes potentially harmful air contaminants. There is now clear evidence that active and passive smoking is not healthy and causes a range of serious illnesses and in some cases, death. Smoking may also conflict with State and Federal laws by denying people with smoke-affected disabilities fair employment in, and safe access to, work sites. Quickstep Technologies' "No Smoking Policy" ensures that, as an employer, Quickstep Technologies continues to address its duty of care responsibilities in respect of employees and contractors regarding active and passive smoking.

Employees and contractors must not come to work if they are under the influence of drugs or alcohol. In particular, employees must not operate machinery or vehicles while under the influence of drugs or alcohol, including prescribed medications that could, through their use, pose a threat to other employees, customers or property. The consumption of alcohol is not permitted in Quickstep premises. No drugs of any kind, other than those required for medical reasons, should be brought into or consumed at the workplace. Employees are not permitted to provide drugs for medical reasons to other employees.

Employees and contractors are expected to declare to their supervisor the use of medication including prescribed medication that could pose a threat to other people including other employees, customers or property.

Employees are not permitted to use mobile phones whilst actively engaged on the shop floor. The use of mobile phones has an established link to distraction which may pose a threat to the safety of the employee, their colleagues, customers and property.

## RESPONSIBILITY TO THE COMMUNITY

Good environmental management is the hallmark of modern business. Employees and contractors must comply with the relevant environmental legislation and the Quickstep Environmental policy.

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## Internal Controls

Quickstep IS ISO9001/AS9100 accredited and has established various financial and accounting control standards to ensure that assets are protected and properly used. Employees and contractors share the responsibility for maintaining and complying with the required internal controls and are required to maintain accurate and reliable financial records and reports.

## Travel and Entertainment

Travel and entertainment should be consistent with the needs of the business. It is the intent of Quickstep that employees neither lose nor gain financially as a result of business travel and entertainment.

Employees who approve travel and entertainment expenses are responsible for the propriety and reasonableness of expenditures, and ensuring that the appropriate requirements under the Quickstep Business Travel and Entertainment Expenses QS--Fin-012 are adhered to at all times.

## Employment after leaving Quickstep

An employee who is about to leave Quickstep for other employment or to conduct their own business must not use their position or confidential information about Quickstep to the benefit of their future employer or business, nor to disadvantage Quickstep in commercial or other relationships. If unsure, employees must discuss the matter with their Manager or Chief Executive Officer respectively.

## Computer and Internet use

Use or duplication of proprietary software, except as described in the software licence agreement, or conditions applying to its use, is an infringement of copyright law and is strictly prohibited. This applies to both personal and Quickstep software.

The security of the Quickstep computer system and data is paramount. Deliberate or reckless security violations of corporate applications or the data network will constitute misconduct.

Access to, storing, distributing or downloading of pornographic or other offensive material is considered a serious breach of the Code of Conduct.

Employees and contractors are required to comply with Quickstep's IT policy as amended from time to time.

## Continuous Disclosure

As a publicly listed company, Quickstep has continuous disclosure obligations to ensure trading in its securities is conducted on a fair basis. The general continuous disclosure rules are contained in Australian Stock Exchange (ASX) Listing Rule 3.1. In effect, Quickstep is obliged (subject to specific exceptions) to advise the ASX of any information that a reasonable person would expect to have material effect on the price or value of Quickstep issued securities (including stapled securities).

Under Section 1001A of the Corporations Law the failure to comply with Listing Rule 3.1 is an offence under the Corporations Law if the failure is intentional or reckless. Thus Quickstep and its employees must comply with the law regarding continuous disclosure.



## Breaches of this Code of Conduct

All employees and contractors have a responsibility to observe this Code and the supporting Policies and ensure that no breaches occur.

If an employee or contractor breaches this Code of Conduct then they will be subject to serious disciplinary action and or potential termination of their employment or contract.

Any employee or contractor who in good faith, makes a complaint or disclosure about an alleged breach of the Code of Conduct and follows the reporting procedure, will not be disadvantaged or prejudiced in the making of such a complaint or disclosure. Any report made by an employee or contractor will be acted upon and kept confidential.

A prompt investigation will take place to address the complaint or disclosure made and the employee or director will be informed of the outcome. The particular circumstances of each case will determine the level of detail contained in the report back.

Employees may at any time, discuss a matter or seek advice on how to proceed with a matter, with their manager or Chief Executive Officer or the Human Resources.

If an employee does not follow the standard of conduct outlined in this Code then they will be subject to serious disciplinary action and potentially termination of employment.

## Administration

Responsibility for the administration of the procedures relating to the Code of Conduct lies with Human Resources. A copy of each complaint or disclosure shall be forwarded, upon receipt by the Manager or the Chief Executive Officer to Human Resources. Human Resources will monitor complaints or disclosures and report to the Chief Executive Officer and the Board as required.

## Conclusion

All employees and contractors are expected to abide by the Quickstep Code of Conduct and supporting policies and procedures, found on the Quickstep Quality Management System server, including legal obligations and responsibilities. The Quickstep Code of Conduct cannot cover every situation. When in doubt, or if an employee, contractor or manager has any questions about their responsibilities, or the Code, it is that person's responsibility to seek clarification from their Manager, Human Resources or Chief Executive Officer respectively.

## Steps for Handling Complaints, Disclosures or Breaches of the Code of Conduct

An employee or contractor should try to address a grievance or dispute or grievance through communication and conciliation at a personal level with the individual or responsible person concerned. Where employees feel unable to do this they can escalate the issue to their immediate supervisor or manager. Where an employee feels they are unable to raise the matter with their immediate or next level manager they can escalate the matter to Human Resources or the Chief Executive Officer.

- In an attempt to resolve the issue, the employee should discuss the matter with the individual involved.
- If they feel unable to do so, or, if they are unable to achieve a resolution the employee should raise the issue with their immediate supervisor.

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- If no resolution is found through Step 2, the employee should discuss the issue with their manager's manager, and if it is still not resolved, the employee may then request the matter to be reviewed with Human Resources.
- An employee may raise the issue with Human Resources if the employee does not feel comfortable raising the issue with the person concerned, their immediate manager / supervisor or their manager once removed.
- Where a member of the Leadership Team makes the initial decision, an alternative person may be nominated by the Company, such as a Human Resources representative or an agreed external advisor, to conduct a review of the decision. The outcome of the review will be final.

## Responsibilities / Accountabilities

1.18 Employees are accountable for:

- Treating all colleagues, customers, suppliers and any other people they may encounter during the course of their work with respect, dignity, honesty and integrity and adhering to the company Code of Conduct at all times
- Treating company equipment and assets in accordance with company values and the Code of Conduct.
- Raising issues or grievances with their immediate supervisor /manager or Human Resources as soon as practicable when an issue or grievance arises to assist in the prompt resolution of the situation / issue.

1.19 Managers / Supervisors are accountable for:

- Treating all issues or grievances raised with them seriously and with the utmost confidentiality
- Responding to and acting on issues raised or grievances in a timely manner
- Seeking guidance from Human Resources on the process to resolve issues or grievances raised by the employees

1.20 Human Resources are accountable for:

- Providing support to employees , managers and directors in managing and, where necessary, investigating employee grievances or issues
- Providing training and / or coaching to managers regarding how to manage employee issues or grievances
- Ensuring the confidentiality of the process is maintained as far as practicable and that all employees / respondents are treated with fairness, honesty and respect
- Ensuring that no individual who raises an issue in good faith suffers any form of discrimination or harassment as a result of any claim made or issue raised