

QUICKSTEP HOLDINGS LIMITED

CODE OF CONDUCT

Table of Contents

1	PURPOSE	2
2	SCOPE	2
3	DEFINITIONS AND ACRONYMS	2
4	PROCESS DETAILS	2
4.1	Quickstep Code of Conduct	2
4.2	Company Values	3
4.3	Safety, Health and Environment	3
4.4	Company Policies	4
4.5	Ethics	4
4.6	Confidentiality	4
4.7	Harassment, Discrimination, Bullying, Victimisation and Vilification	5
4.8	Work Attire	5
4.9	Quickstep Intellectual Property	5
4.10	Conflict of Interest	5
4.11	Making Statements about Official Matters	6
4.12	Giving and/or Accepting Gifts, Gratuities or Other Benefits	6
4.13	Use of Quickstep Property, Money, Goods or Services	6
4.14	Employment after Leaving Quickstep	6
4.15	Continuous Disclosure	6
4.16	Breaches of the Code of Conduct	7



I PURPOSE

The purpose of this procedure is to define the standards of behaviour for Quickstep's employees and contractors in the performance of their duties. It also provides the framework for the values and principles in which Quickstep employees are to promote, maintain, uphold and embody while at work and when dealing with each other, visitors and shareholders and while representing Quickstep in public or when dealing with the broader community.

2 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 employed or engaged by Quickstep Holdings Ltd, and subsidiaries (Quickstep).

3 DEFINITIONS AND ACRONYMS

Values: Integrity, Excellence, Agility, Responsibility, Teamwork, Innovation

4 PROCESS DETAILS

4.1 Quickstep Code of Conduct

- a. Quickstep employees will promote, maintain, uphold and embody the Quickstep Values while at work and when dealing with each other, shareholders, customers, suppliers and when representing Quickstep in public or dealing with the broader community.
- b. Quickstep employees, contractors and visitors will be committed to ensuring a safe and healthy workplace and together with the Company conduct all aspects of our operations in a manner that is protective of human health and the environment. This duty of care and moral duty requires employees to anticipate possible causes of injury and illness and to do everything practicable to remove or minimise these possible causes of harm. All employees and visitors are responsible for keeping safety and health top of mind, and should:
 - Promptly report unsafe or hazardous conditions to supervisors and hosts;
 - Comply with all Quickstep policies, standards and procedures relating to Environmental, Health and Safety; and
 - Comply with all applicable workplace health and safety laws and regulations.
- c. Quickstep employees will abide by the Quickstep Code of Conduct as well as any and all Company policies and procedures, in addition to any applicable legal obligations and responsibilities.
- d. In all dealings with customers, suppliers, competitors and each other, Quickstep employees will act with the highest level of integrity and will observe the rule and spirit of the legal and regulatory environment in which Quickstep operates.
- e. It is expected that at all times Quickstep employees will treat the information that becomes known to them through the course of their work, including their own financial information, with an appropriate level of confidentiality and respect.
- f. Quickstep employees will work together to ensure that inclusivity and diversity are both promoted and encouraged within our employees, contractors, visitors, and external shareholders.
- g. Quickstep employees are to ensure their dress and personal appearance is appropriate for the performance of their duties inclusive of any required safety clothing or equipment.



- h. Intellectual property developed by an employee or contractor of Quickstep during or as a result of their employment will remain the sole property of Quickstep.
- i. Quickstep employees must disclose any actual, potential or perceived conflicts of interest during the course of their employment with Quickstep.
- j. Quickstep employees must not make statements without approval about official matters relating to Quickstep or on behalf of Quickstep.
- k. Quickstep employees must not accept or solicit any gifts, gratuities or other benefits of a value greater than \$250 without the approval of the Chief Executive Officer.
- l. Quickstep employees shall be scrupulous in the proper use of Quickstep information, funds, equipment and facilities.
- m. Employees having left Quickstep must not use their position or information obtained whilst employed by Quickstep to the detriment of Quickstep.
- n. All Quickstep employees must comply with legislation surrounding continuous disclosure.
- o. Quickstep employees will report any breaches or suspected breach of the Code of Conduct or any and all applicable laws and regulations relevant to Quickstep.
- p. Quickstep's [Whistleblower Policy](#) outlines the procedure to follow to refer breaches via the channels prescribed in that policy or give staff this option if they wish to remain anonymous.

4.2 Company Values

Quickstep employees will promote, maintain, uphold and embody the Quickstep Values while at work and when dealing with each other, shareholders, customers, suppliers and while representing Quickstep in public or when dealing with the broader community.

4.3 Safety, Health and Environment

Quickstep employees, contractors and visitors will be committed to ensuring a safe and healthy workplace and together with the Company conduct all aspects of our operations in a manner that is protective of human health and the environment and avoid adverse impacts to all stakeholders and broader community.

Employees and contractors must cooperate and comply with Quickstep's Environmental, Health and Safety policy and associated procedures as well as Quickstep's Golden Safety Rules. Employees and contractors must undertake EHS training where required, avoid and prevent the misuse of safety and first aid equipment, wear safety clothing where provided and directed, and report all hazards, accidents, incidents, injuries and unsafe practices immediately. Employees and contractors must also comply with relevant legislation and regulations pertaining to EHS.

Quickstep observes a no smoking policy except for the limited designated areas only on all facilities which ensures that, as an employer, Quickstep addresses its duty of care responsibilities in respect of employees and contractors regarding active and passive smoking. Quickstep actively supports employees to quit smoking.

Employees and contractors must not come to work if they are in the possession of or under the influence of drugs and/or alcohol. This includes prescription medications that could, through their use, pose a threat to the employee, other employees, customers or property. As such, employees and contractors are expected to declare to their supervisor or Human Resources the use of medication including prescribed medication that may impact their performance.

Employees are not permitted to use mobile phones whilst actively engaged in the production areas. If a mobile phone has to be used, the employee must ensure they are away from production activity or movement of machinery or parts and be stationary at all times at all times whilst using the phone. 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.



4.4 Company Policies

Quickstep employees will abide by the Quickstep Code of Conduct as well as any and all Company policies and procedures, in addition to any applicable legal obligations and responsibilities.

Employees must be aware of, and adhere to, all current company policies, especially those relating to Environmental, Health and Safety; Equal Employment Opportunity; Diversity; Bullying and Harassment Prevention; and Confidentiality as amended from time to time and accessible on the company Quality Management System.

In the course of their duties, employees must also comply with any and all applicable laws and regulations of the country and state in which they work as well as any reasonable instruction or lawful direction provided to them which relates to their employment with Quickstep.

4.5 Ethics

In all dealings with customers, suppliers, competitors and each other, Quickstep employees will act with the highest level of integrity and will observe the rule and spirit of the legal and regulatory environment in which Quickstep operates

Quickstep will not tolerate any incidents of corruption, bribery or fraudulent behaviour associated with the company. As such, it is expected that all employees will act in an honest and trusting manner at all times and comply with the Anti-Corruption and Bribery Policy.

Quickstep employees are required to question or raise concerns immediately with their Manager or Human Resources regarding any witnessed or observed behaviour which is inconsistent with the Company Values or is inconsistent with the ethics section of the Quickstep Code of Conduct, or breach of the Anti-Bribery and Corruption Policy.

4.6 Confidentiality

It is expected that at all times Quickstep employees will treat the information that becomes known to them through the course of their work, including their own financial information, with an appropriate level of confidentiality and respect.

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.

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.

At all times directors, managers, employees and contractors are required to adhere to the 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.

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.



4.7 Harassment, Discrimination, Bullying, Victimization and Vilification

Quickstep employees will work together to ensure that inclusion and diversity are both promoted and encouraged within our employees, contractors, visitors, and external stakeholders.

Quickstep is committed to ensuring that all employees are treated in a fair and safe manner at all times. This includes preventing any form of harassment, discrimination, bullying, victimisation or vilification in the workplace.

All employees and contractors must be aware of QS-HRD-005 Equal Employment Opportunity, QSD-HRD-014 Harassment and Bullying Prevention 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.

4.8 Work Attire

Quickstep employees are to ensure their dress and personal appearance is appropriate for the performance of their duties inclusive of any required safety clothing or equipment.

All Quickstep employees are expected to dress appropriately during work hours and whilst visiting Quickstep premises. Employees are expected to present themselves in a professional manner as well as abide by Quickstep's Personal Protective Equipment guidelines at all time. Uniforms will be provided to employees in the production areas, these must be kept clean and tidy. At all times employees must ensure that their work attire does not present a safety issue to themselves or others.

4.9 Quickstep Intellectual Property

Intellectual property developed by an employee or contractor of Quickstep during or as a result of their employment will remain the sole property of Quickstep.

Any documentation, invention, design, improvement or idea (otherwise 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.

4.10 Conflict of Interest

Quickstep employees must disclose any actual, potential or perceived conflicts of interest during the course of their employment with Quickstep.

Any personal, financial or other interest which may represent an actual, potential or perceived conflict must be disclosed by the employee, board member and/or contractor and discussed with their manager, the Chief Executive Officer, or the Chairman of the Board 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, company or transaction in and may improperly influence the employee in the performance of his or her duties.

4.11 Making Statements about Official Matters

Quickstep employees must not make statements without approval about official matters relating to Quickstep or on behalf of Quickstep.

Employees and 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 the Chief Executive Officer. Further, no statements should be made as a private citizen, on an official matter relating to Quickstep via the media and all requests for comment should be referred to the Chief Executive Officer.

4.12 Giving and/or Accepting Gifts, Gratuities or Other Benefits

Quickstep employees should not accept or solicit any gifts, gratuities or other benefits without the approval of the Chief Executive Officer. However it is recognised that on occasion there may be minor gifts and benefits that are offered, minor in nature would be something valued at less than \$250.

Gifts or benefits that may appear to influence any aspect of our work must be neither solicited nor accepted. As such, employees and 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 the Chief Executive Officer. Employees must comply with the QS-HRD-012 Anti- Bribery and Corruption.

4.13 Use of Quickstep Property, Money, Goods or Services

Quickstep employees shall be scrupulous in the proper use of Quickstep information, funds, equipment and facilities.

All Quickstep employees will be held accountable for the manner in which Quickstep property, funds, facilities and/or services are used. Quickstep property, funds, facilities and/or services should only be used for efficiently, economically and authorised purposes and be in accordance with the designated financial authority.

4.14 Employment after Leaving Quickstep

Employees having left Quickstep must not use their position or information obtained whilst employed by Quickstep to the detriment of 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.

4.15 Continuous Disclosure

All Quickstep employees must comply with legislation surrounding 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.

4.16 Breaches of the Code of Conduct

Quickstep employees will report any breaches or suspected breach of the Code of Conduct or any and all applicable laws and regulations relevant to Quickstep.

All employees and contractors have a responsibility to observe the Quickstep Code of Conduct as well as all Company Policies and Procedures 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. The steps to be taken for handling complaints, disclosures or breaches of the code is outlined in the Grievance Procedure.

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

Please contact Human Resources for any further questions you may have about the Code of Conduct.

Sponsor: Jacque Courtney-Pitman	Title: Executive General Manager HR	Review Date: August 2020
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