

QUICKSTEP HOLDINGS LTD

CODE OF CONDUCT

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1 PURPOSE

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

2 SCOPE

This procedure defines the Quickstep Code of Conduct through guiding principles ratified by the Board of Directors for Quickstep and applies to all directors, employees and contractors employed or engaged by Quickstep Holdings Ltd, and its subsidiaries (Quickstep or the Company).

3 DEFINITIONS & ACRONYMS

Values (Ways of Being): Courage, Agility, All-in (CAN Culture)

4 ASSOCIATED DOCUMENTS

- ▶ QS-HRD-010 Diversity Policy
- ▶ QS-HRD-012 Anti- Bribery and Corruption
- ▶ QS-HRD-014 Unlawful Workplace Behaviour Prevention
- ▶ QS-HRD-015 Grievance Procedure
- ▶ QS-ITD-008 Corporate IT Acceptable Use Policy
- ▶ QS-FIN-001 Delegated Authority for Financial Expenditure
- ▶ QS-WHS-041 Use of Electronic and Communication Devices
- ▶ QS-HRD-024 Whistleblower Policy
- ▶ QS-HRD-023 Sponsorship and Donations Policy and Guidelines
- ▶ QS Continuous Disclosure and Stakeholder Communication Policy

5 PROCESS DETAILS

5.1 Quickstep Code of Conduct

- a. Quickstep directors, employees and contractors will promote, maintain, uphold and embody the Quickstep Values whilst at work and when dealing with each other, shareholders, customers, suppliers and when representing Quickstep in public or within the broader community.
- b. Quickstep directors, employees and contractors will be committed to ensuring a safe, respectful, inclusive and healthy workplace and conduct all aspects of our operations in a manner that is protective of human health and the environment. This duty of care requires the anticipation of possible causes of injury and to do everything reasonably practicable to remove or minimise possible causes of harm. All directors, employees, contractors and visitors are responsible for keeping safety and health top of mind, and must:

- Only attend the workplace when fit for work;
 - Promptly report unsafe or hazardous conditions to supervisors and hosts;
 - Comply with all Quickstep policies, standards and procedures relating to the Environment, Health and Safety; and
 - Comply with all applicable workplace health and safety laws and regulations.
- c. Quickstep employees will abide by this Quickstep Code of Conduct as well as by any and all Company policies and procedures, in addition to any applicable legal obligations and responsibilities.
- d. In all dealings with external parties 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 company financial information, with confidentiality and respect.
- f. Quickstep employees will work together to ensure that inclusivity and diversity are respected, promoted and encouraged within our business.
- g. Quickstep employees are to ensure their dress and personal appearance is appropriate for the performance of their duties, including strict adherence to the use 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 comply with the Anti-Bribery and Corruption Policy in regards to the acceptance or solicitation of any gifts, prizes, gratuities or other benefits.
- 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 in accordance with their contract of employment.
- n. All Quickstep employees must comply with legislation surrounding continuous disclosure.
- o. Quickstep employees must report any breaches or suspected breaches of this 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.
- q. Quickstep employees will report any significant changes in their circumstances throughout their employment (e.g. being charged with a criminal offence, bankruptcy etc).
- r. All employees must uphold the expected level of professional conduct and ethical behavior when using social media. Personal social media may only be used during breaks and outside of working hours.

5.2 Statement of Company Values (Ways of Being)

Quickstep employees will promote, maintain, uphold and embody the Quickstep Ways of Being whilst at work and when dealing with each other, shareholders, customers, suppliers and whilst representing Quickstep in public or with the broader community. These are available on the company intranet and around the workplace.

5.3 Safety, Health and Environment

Quickstep directors, employees and contractors will be committed to ensuring a safe, respectful, inclusive and healthy workplace and 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 (as displayed in the workplace). Employees and contractors must undertake EHS training where required, prevent the misuse of safety and first aid equipment, wear safety clothing where provided and as directed, and report all hazards, incidents 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 within limited designated areas 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 cease 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 safety of the employee, other employees, customers or property. As such, employees and contractors are expected to declare to their supervisor or to 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 the movement of machinery or parts and be stationary at all times whilst using the phone. The use of mobile phones in the workplace has an established link to distraction, which may pose a threat to the safety of the employee, their colleagues, customers and property.

5.4 Company Policies

Quickstep employees will abide by this Quickstep Code of Conduct as well as by 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, 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 given to them which relates to their employment with Quickstep.

5.5 Ethics

In all dealings with external parties, the Company and each other, Quickstep employees will act with the highest levels 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 behavior associated with the company or by an individual in the conduct of their employment. As such, it is expected that all employees will act in an honest and trusting manner at all times including compliance 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 behavior which is inconsistent with the Company Ways of Being or is inconsistent with this policy.

5.6 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 company financial information, with 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 in the normal course of duties or otherwise must not be used to obtain financial reward (outside of established company reward and recognition benefits) or to gain other benefits, or to take advantage of another person.

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

All directors, employees and contractors of Quickstep shall ensure that all transactions in Quickstep securities comply with the Australian Corporations Act and Regulations, as amended from time to time (particularly the insider trading laws).

5.7 Harassment, Discrimination, Bullying, Victimisation and Vilification

Quickstep employees will work together to ensure that inclusion and diversity are both promoted and encouraged within the business.

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 unlawful behaviour including but not limited to harassment, sexual and sex-based harassment, discrimination, bullying, victimisation or vilification in the workplace.

All employees and contractors must be aware of Unlawful Workplace Behaviour Prevention Policy and the responsibility that it places on employees to respect the rights of individuals. Directors, employees and contractors must not discriminate against, bully or harass, directly or indirectly, any person in the course of their employment.

5.8 Work Attire

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

All Quickstep employees are expected to dress appropriately during work hours and whilst visiting Quickstep premises, or whilst representing Quickstep at an alternate location. 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 provided to employees must be maintained and kept clean and tidy. At all times employees must ensure that their work attire does not present a safety issue to themselves or others.

5.9 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 as 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.

5.10 Conflict of Interest

A conflict of interest arises when an employee, contractor or director has a direct or indirect interest in a property, investment, company or transaction which may improperly influence the employee in the performance of his or her duties.

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 Chair of the Board to avoid a conflict of interest occurring.

5.11 Making Statements about Official Matters

Quickstep employees must not make public 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. Furthermore, no statements should be made as a private citizen, on an official matter relating to Quickstep via the media or via social media platforms and all requests for comment should be referred to the Chief Executive Officer.

5.12 Giving and/or Accepting Gifts, Prizes, Gratuities or Other Benefits

Quickstep employees must comply with Anti-Bribery and Corruption Policy and Sponsorship and Donations Policy and Guidelines in regards to the acceptance and solicitation of any gifts, prizes, gratuities or other benefits.

Gifts or benefits that may appear to influence any aspect of Quickstep's business must be neither solicited nor accepted.

5.13 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 authorised purposes and be in accordance with the designated financial or other levels of authority.

5.14 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, in accordance with their contract of employment.

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.

5.15 Continuous Disclosure

All Quickstep employees must comply with legislation surrounding continuous disclosure and the Quickstep Continuous Disclosure and Stakeholder Communication Policy.

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 a material effect on the price or value of Quickstep issued securities.

The failure to comply with Listing Rule 3.1 is an offence under the Corporations Act.

5.16 Breaches of this Code of Conduct

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

All employees and contractors have a responsibility to observe this Quickstep Code of Conduct as well as all Company Policies and Procedures and to ensure that no breaches occur.

If an employee or contractor breaches this Code of Conduct then this may lead to disciplinary action including 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 this 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 investigated following which, appropriate actions will be taken. Reports are kept confidential, however, there may be situations where anonymity cannot be guaranteed and, in such situations, the complainant will be informed and all situations will be managed in accordance with relevant legislation. The steps to be taken for handling complaints, disclosures or breaches of the code are 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 this Code of Conduct.

The Board of the Company must be informed of any material breaches of this Code of Conduct.

Sponsor Sarah Hart Head of People and Culture	Board Approval Date December 2024
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