



Code of Conduct Policy

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Table of Contents

1	Commitment to the Code of Conduct	4
1.1	Ethical Standards	4
1.2	The Code	4
1.3	Scope	4
1.4	Stakeholders	4
1.5	Compliance	4
1.6	Code Review	4
2	Responsibilities to shareholders and the financial community	4
2.1	Corporations Act	4
2.2	Shareholders	5
2.3	Disclosure	5
3	Responsibilities to clients and customers	5
3.1	Valuing Clients and Customers	5
3.2	Quality of services	5
3.3	Privacy policy	5
4	Employment Practices	6
4.1	Equal opportunity	6
4.2	Diversity	6
4.3	Training and potential	6
4.4	Honesty and integrity	6
4.5	Use of Company funds and resources	7
4.6	Confidentiality	7
4.7	Insider trading	7
4.8	Conflicts of interest	7
4.9	Drug and alcohol use	7
5	Fair trading and dealing	8
5.1	Commitment to fair trading and dealing	8

5.2	Bribes	8
5.3	Gifts.....	8
5.4	Personal Gain.....	8
5.5	Agreements with competitors.....	9
6	Responsibilities to the community	9
6.1	Environmental protection	9
6.2	Human rights	9
6.3	Support for the community.....	9
6.4	Political involvement	9
7	Responsibilities to the individual – collection of information	10
8	International compliance	10
9	Monitoring compliance with the Code	10
9.1	Code Promotion.....	10
9.2	Violation Reporting.....	10
10	Public availability of materials	10

1 Commitment to the Code of Conduct

1.1 Ethical Standards

The Company endeavours to be recognised as an organisation committed to the highest ethical standards in business. We aspire to be a role model in conducting business honestly and fairly. We are proud of the quality of our employees and of the professional reputation and market image built by their work.

1.2 The Code

This Code of Conduct (Code) reflects our high standards of professional conduct and ethics in dealing with all of our stakeholders and our commitment to complying with all applicable State, national and international laws.

1.3 Scope

This Code is applicable to all Directors, employees and contractors of the Company or any of the Company's group companies.

1.4 Stakeholders

The Company considers stakeholders as employees, shareholders, creditors, customers, suppliers, contractors, governmental and nongovernmental organisations, the communities where the Company operates and other parties that have influence over or are influenced by the Company.

1.5 Compliance

The Company is firmly committed to compliance with the Code. Any action contrary to the Code will be considered a serious matter by the Company. Disciplinary action, including termination for misconduct, may be taken against any Director, employee or contractor who contravenes the Code.

1.6 Code Review

The Company will periodically review and update the Code.

2 Responsibilities to shareholders and the financial community

2.1 Corporations Act

In addition to this Code, the Company complies with all provisions of the Corporations Act 2001, the ASX Listing Rules and all other applicable rules and legislation.

2.2 Shareholders

- (1) We have a positive relationship with our shareholders. We always attempt to respond to their inquiries and requests as quickly as possible.
- (2) The Company is committed to delivering value for shareholders and exerts its best efforts to maximise shareholder benefits.
- (3) The Company treats all shareholders equally.

2.3 Disclosure

The Company values communication with its shareholders, other stakeholders and the public at large, and will fulfil its duty to make full, fair and timely disclosure of relevant information to shareholders and the ASX.

3 Responsibilities to clients and customers

3.1 Valuing Clients and Customers

The Company highly values its clients and customers. We continually strive to deliver the best possible outcomes for our clients and customers. We act fairly and reasonably in our dealings with clients and customers.

3.2 Quality of services

The Company also ensures the provision of accurate information so that clients and customers may make informed decisions regarding the Company's products and services.

3.3 Privacy policy

- (1) In some circumstances it will be necessary to maintain files about our clients and customers.
- (2) The Company will respect and maintain the privacy of personal information held by the Company and comply with the Privacy Act (Cth) 1998.
- (3) The Company only maintains files about a client from information provided by them or related companies as a consequence of information provided by the client.
- (4) The Company does not disclose information about the client except in the ordinary operation of the affairs of the Company, which may include providing information on a confidential basis to a mailing house when we send out newsletters and other publications concerning services available to clients.
- (5) At any time, a client may opt out of receiving communications from the Company (other than as required for the operation of our business, e.g. regarding payment of an account or to communicate in relation to a legal matter).
- (6) Ordinarily we will not release the contents of a file without the client's consent. However, we advise that there may be occasions where the Company may be required to release the details of a file, irrespective of whether the individual has consented to the disclosure of

the information. This will occur where the law requires disclosure, such as pursuant to a subpoena.

- (7) A client may, without reason, request access to the information held about them. If a client believes that any information held about them is incorrect, incomplete or inaccurate they may request the information to be amended. If the Company does not agree that there are grounds for amendment, then we will add a note to the information stating that the client disagrees with it.
- (8) Any questions regarding the operation of this privacy policy should be directed to the Privacy Officer, who is the company secretary.
- (9) Any agreements between the client and the Company must be kept confidential, as appropriate.

4 Employment Practices

4.1 Equal opportunity

The Company is an equal opportunity employer. This means that the Company does not discriminate on the basis of racial origin, gender, age, ethnicity, marital status, disability, religious or philosophical beliefs, sexual preference or political affiliation. The Company considers allegations of harassment and unlawful discrimination as extremely serious and will take appropriate action.

4.2 Diversity

The Company has adopted a Diversity Policy (SCEE-MN-CG-POL-0010) which promotes and supports a diverse workforce at all levels of the Company. It is our belief that creating a work environment that enables us to attract, retain, and fully engage diverse talents leads to enhanced innovation and creativity in our products and services.

4.3 Training and potential

The Company believes in enabling employees to develop to the extent of their full capabilities. We improve our employee's skills and competencies by regular performance reviews and undertaking education, training and coaching. We recognise potential and offer professional development opportunities within the Company.

4.4 Honesty and integrity

- (1) Employees must act honestly and with integrity in all of their dealings for the Company.
- (2) Employees must be truthful and not mislead or make false statements, nor mislead by omission, and must not make promises or commitments that the Company does not intend, or would be unable, to honour.

4.5 Use of Company funds and resources

- (1) Employees must not use Company funds, property, equipment, or other resources for personal benefit.
- (2) Employees should use Company funds sensibly and effectively. Employees must report expenditures accurately. The Company will treat submission of a fraudulent expense report as serious misconduct.

4.6 Confidentiality

- (1) Employees are required to protect proprietary, commercial and other information that is confidential to the Company. Obligations of confidentiality continue after an individual's employment with the Company ends.
- (2) Information that is not publicly available concerning the activities, results or plans of the Company must only be used for authorised purposes.

4.7 Insider trading

- (1) In the course of doing business for the Company or in discussions with one of its clients or customers employees may become aware of material non-public information about that organisation. Information is considered material if an investor could use the information to make a decision to trade in the shares of that organisation.
- (2) The Company has adopted a Securities Trading Policy (SCEE-MN-CG-POL-0011) to govern dealing in Securities and protect against insider trading.

4.8 Conflicts of interest

- (1) Employees of the Company are expected to act at all times in the Company's best interests and to exercise sound judgment unclouded by personal interests or divided loyalties.
- (2) Employees must avoid the appearance of, as well as actual, conflicts of interest in both their performance of duties for the Company and their outside activities.
- (3) In circumstances where there is an actual, or perceived, conflict of interest employees must notify their managers.

4.9 Drug and alcohol use

- (1) Employees of the Company will not be under the influence of drugs or alcohol in any situation where they are identifiable as an employee of the Company.
- (2) Smoking is not permitted in the workplace other than in designated outdoor areas.
- (3) Random testing of employees of the Company will be undertaken to determine compliance with this requirement.

5 Fair trading and dealing

5.1 Commitment to fair trading and dealing

The Company believes that the Company, the economy, and the public benefit if businesses compete vigorously. The Company, its employees, and representatives will treat customers, business allies and suppliers fairly and will not engage in anticompetitive practices that unlawfully restrict the free market economy. The Company is therefore firmly committed to upholding the Competition and Consumer Act 2010 and corresponding State and international legislation.

The Company has adopted an Anti-bribery and Corruption Policy (SCEE-MN-CG-POL-0002).

5.2 Bribes

- (1) The Company's objective is to compete in the marketplace on the basis of superior products, services and competitive prices.
- (2) No payment or receipt of bribes in any form may be made or received directly or indirectly to or from anyone for the purpose of obtaining or retaining business, or to obtain any other favourable action. A violation of this policy will subject the employee to disciplinary action as well as potential criminal prosecution.

5.3 Gifts

- (1) Employees must exercise extreme care when giving or receiving business-related gifts.
- (2) Employees should exercise particular caution in regard to any offers of value, including hospitality, entertainment and gifts when the Company is negotiating a contract and so may be in a position to influence, directly or indirectly the outcome of a decision. There must not be an impression of an improper connection between any gift and business opportunities.
- (3) The Company prohibits the giving and receiving of gifts in connection with SCEE's operations where these go beyond common courtesies associated with general commercial practice.
- (4) The employee must consider the monetary value of the gift, local custom and legal requirements when determining whether a gift should be retained or returned.
- (5) Employees must not request gifts from any party with whom the Company conducts business. Employees must not exchange gifts with the Company's competitors, without the prior consent of the Chief Executive Officer, as this may create an actual or perceived conflict of interest.

5.4 Personal Gain

Employees must not use their status to seek personal gain from those doing business or seeking to do business with the Company.

5.5 Agreements with competitors

- (1) Formal or informal agreements with competitors that seek to limit or restrict competition in some way would often be illegal. Unlawful agreements include agreements that seek to fix or control prices, allocate products, markets or territories, or boycott certain customers or suppliers.
- (2) To ensure compliance with State and federal trade practices legislation, discussions with competitors regarding any of these potential agreements is a violation of this Code and will subject the employee to disciplinary action as well as the potential for criminal prosecution.

6 Responsibilities to the community

6.1 Environmental protection

The Company respects the environment and seeks to protect our natural resources. Wherever possible we prevent or otherwise minimise and mitigate harmful effects of the Company's operations on the environment. Compliance with all environmental laws and regulations is the foundation on which we build our environmental performance.

6.2 Human rights

The Company has a Human Rights Policy (SCEE-MN-CG-POL-0013) with an aim of protecting and upholding fundamental human rights at all of our operations and projects and in the communities in which we operate.

Our activities are guided by the International Bill of Rights and the UN Guiding Principles on Business and Human Rights.

6.3 Support for the community

We have a strong commitment to the improvement of society as well as the communities we serve and in which we operate. We encourage the support of charitable, civic, educational, and cultural causes.

6.4 Political involvement

The Company does not directly or indirectly participate in party politics. The Company does not make payments to political parties or individual politicians in any country. Employees must not use their role within the Company for political interests at any time.

7 Responsibilities to the individual – collection of information

Collecting information on our competitors from legitimate sources to evaluate the relative merits of their products, services, and marketing methods is proper and often necessary. The Company considers obtaining information illegally to be a serious breach of the Code. In addition, seeking confidential information from a new employee who recently worked for a competitor, or an employee misrepresenting their identity in the hopes of obtaining confidential information from a competitor is strictly prohibited.

8 International compliance

Where the Company operates outside of Australia the Company will comply with all applicable local and international laws. As far as practicable, employees are expected to know and follow the laws of the relevant market where the Company operates.

9 Monitoring compliance with the Code

9.1 Code Promotion

It is the responsibility of every employee of the Company to promote the Code.

9.2 Violation Reporting

- (1) The Company has established a Whistleblower Policy (SCEE-MN-CG-POL-0003) which included a system for reporting violations of any of the Company policies and the Code, as well as any suspected misconduct by any employee or representative of the Company.
- (2) The Company will not permit any form of retribution against any person, who, in good faith, reports known or suspected violations of the Code or any other Company policy.

10 Public availability of materials

This Code or a summary of its main provisions shall be made publicly available on the Company's website in a clearly marked corporate governance section.