

Code of Conduct & Acceptance Form

Policy Owner	People Operations & Strategy
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Purpose

We value our People at Wilson and acknowledge that it is their commitment, skill, results and general contribution that combine to create enduring value and achieve our business strategy, operational goals and customer satisfaction.

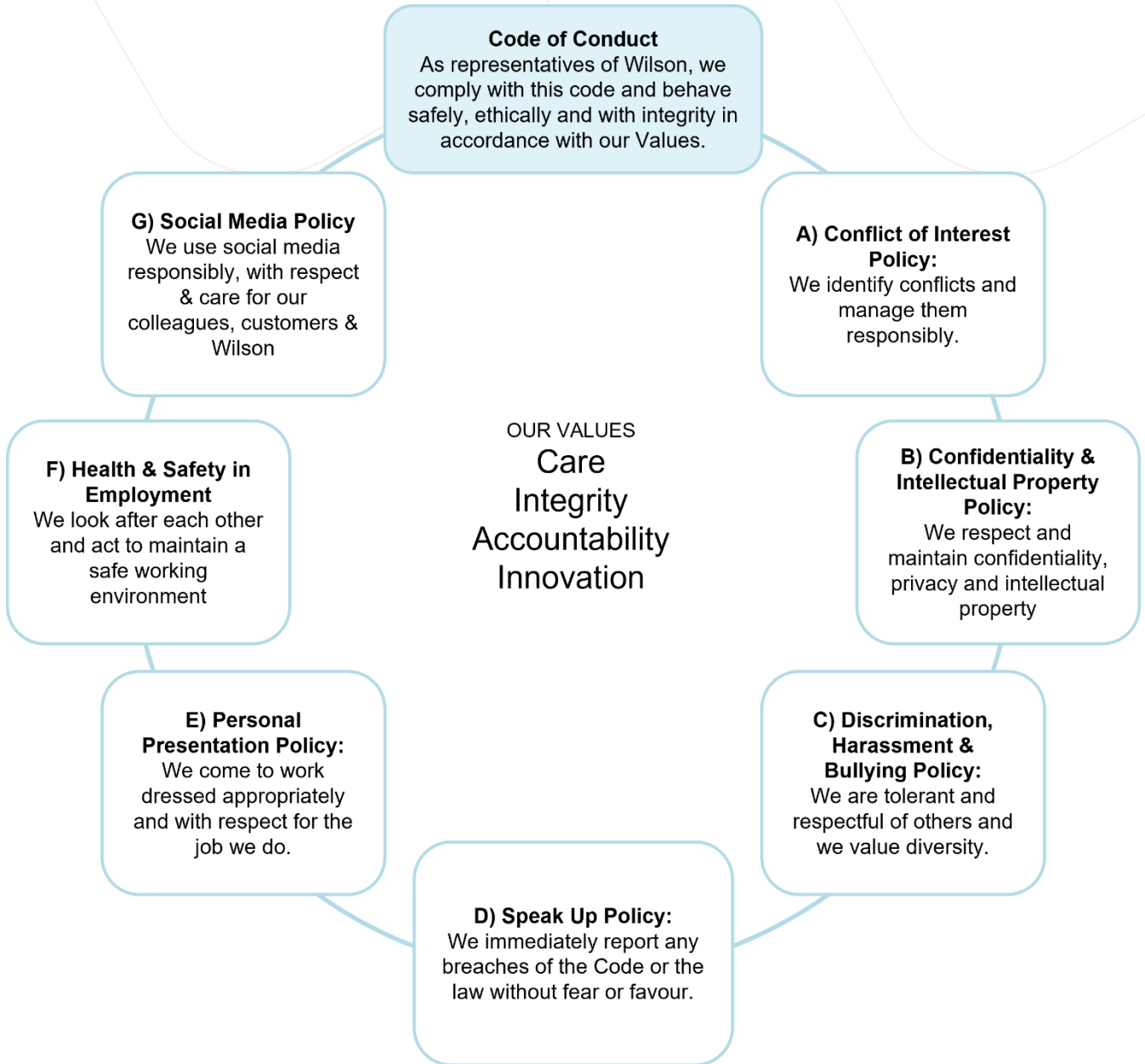
We firmly believe that it is not just *what* we do, but also *how* we work together to achieve results that makes the Wilson difference. Our Code of Conduct describes the expectations we have of all our People, underscored by our Values of **Care, Integrity, Accountability and Innovation**.

Our Code of Conduct Framework sets the standards for the way we work and, when read as a whole, provides relevant guiding principles for helping us all make well-judged decisions in our day-to-day work. The Framework also provides clear behavioural expectations so that everyone can work in a productive and considerate environment, where compliance is paramount.

Code of Conduct Framework

What is included in our Code of Conduct Framework?

Our Code of Conduct Framework explains the way we are expected to behave and work together, in accordance with our Values, to achieve a tolerant, ethical, fair and consistent workplace culture. The Framework also comprises a range of Policies that outline the standards of conduct and expectations we have of our People that, together, form our overarching Code of Conduct. The Policies that form our Code of Conduct Framework are shown in the diagram below. Each provides specific guidance and information about the obligations in each of the areas covered, which may from time to time be amended, or be added to as circumstances change.





Scope

Who is covered by the Code of Conduct?

Our Code of Conduct Framework applies to employees across Australia and to the extent relevant, to all consultants and contractors who have been engaged to provide services to Wilson and our related companies. This includes employees who are covered by an Award or enterprise agreement.

When does the Code of Conduct apply?

The application of our Code of Conduct is not limited to the workplace or standard working hours. Our expectations for how our People behave and conduct themselves extend to any work-related context including work travel; attending external events such as conferences or training; work functions or parties; and when entertaining business stakeholders (which includes but is not limited to customers; agents; suppliers; contractors; franchisees; joint venture partners; subsidiaries; unions; government; or regulatory authority officials).

Policy

Complying with our Code of Conduct Policy and Framework is a requirement of ongoing employment or engagement with Wilson. All individuals must read and understand our Code of Conduct Framework and must sign the **Code of Conduct Acknowledgement & Acceptance Form** (attached at the end of this Policy at Appendix A) if required. For completeness, a failure to sign the Acknowledgement & Acceptance Form does not mean that an individual is not required to comply with the Code of Conduct.

Breaches of this Code of Conduct

We take our Code of Conduct very seriously. Disciplinary action, up to and including termination of employment or engagement, may be taken against any person found to be in breach of one or more of the policies that make up our Code of Conduct Framework or any other Wilson Policy.

All individuals are required to report any actual or suspected breach of this Code of Conduct, or any other Wilson Policy. This includes, but is not limited, any actual or suspected incidence of corrupt, illegal or unethical conduct or behaviour. Wilson is committed to treating reports seriously, with sensitivity and confidentially so far as possible. Wilson is also committed to cooperating with any agency or government department which may be conducting investigations as part of a lawful process.

Corporate Governance

Good Corporate Governance is a natural and important part of our Code of Conduct Policy. Wilson is committed to delivering compliant corporate governance in all areas of our business practice in



order to compete globally and to maintain and promote our stable and ethical reputation in the marketplace and industry sectors we operate in.

In all activities and decisions made by Wilson, its officers must abide by the requirements of the applicable corporations-related legislation and any amendments made to it from time to time.

Corporate Governance Principles

The following underlying principles are used to guide our approach to doing business and will be represented to both internal and external stakeholders through our actions and communications. It is our intention to maintain and fulfil our clients' requirements and expectations while, at the same time, sustaining profitability on behalf of our Shareholder. Led by the Board, Executive Team and Senior Management, we are committed to:

- communicating clearly the roles and responsibilities of the Board and Management with all relevant stakeholders;
- facilitating and maintaining an appropriately qualified Board and Senior Executive team, both in experience and dimension, which will reflect coverage of matters which fall under its accountability and direction; demonstrating ethical and responsible decision-making in our activities; providing credible and transparent financial reporting which is independently audited and verified;
- providing and promoting disclosure of material matters relating to our operations (as required by law) in a timely and balanced manner;
- demonstrating respect and acceptance of our Shareholder's wishes and instructions, facilitating the effective exercise of those instructions;
- developing and maintaining sound systems for risk identification, minimisation and control;
- providing a fair, structured and quantified approach to remuneration, recognition and individual reward;
- promoting practices which facilitate enhanced performance and effectiveness on behalf of the Board and the management team at all levels; and
- respecting and supporting the legal and related (legitimate) interests of stakeholders.

We are also committed to ensuring that relevant procedures are implemented where applicable to enable all business units to support these principles, accompanied by supporting information to Wilson representatives where necessary.

All employees are required to support and make a positive contribution towards our commitments to good corporate governance by ensuring that their actions are aligned with the principles outlined above and that they adhere to our Code of Conduct. In activities at branch and operational levels, agreed service standards and our Code of Conduct Framework will form the minimum acceptable standard of service and delivery.



Human Rights and Modern Slavery

Wilson opposes all forms of slavery and forced labour. Wilson is firmly committed to the international principles that underpin human rights and modern slavery, particularly in the areas of employment, industrial relations, anti-corruption and environment, including ensuring modern slavery is not taking place within our organisation or within our supply chain.

Wilson is committed to:

- adhering to Wilson's Human Rights Policy
- conducting business in a manner that upholds and respects human rights, and complies with all applicable laws, regulations and legislation
- developing and maintaining a fair, diverse and inclusive workforce that does not discriminate against any employee on the basis of protected attributes, including gender, nationality, race, ethnicity, sexual orientation, marital status, age, physical appearance, religion, political affiliation or union membership
- ensuring fair remuneration and working conditions of our workforce
- prohibiting any form of modern slavery as defined in the *Modern Slavery Act 2018*

Responsibilities

All individuals: are responsible for familiarising themselves and complying with our Code of Conduct Framework.

If you do not understand your obligations under the Code of Conduct, please speak to your manager or a Human Resources representative.

Values and Behaviours

Wilson Values

Our Values provide a set of core behaviours that are the minimum expectation required of all. They describe the essence of what we believe to be important in the way we conduct ourselves with our colleagues and with our customers, visitors, contractors, suppliers and other stakeholders. In complying with our Code of Conduct, you are expected to adhere to the following standards of behaviour:



OUR VALUES	OUR BEHAVIOURS	BEHAVIOURS THAT REINFORCE	BEHAVIOURS THAT UNDERMINE
Care <i>People, customers and communities matter</i>	Our decisions and behaviours demonstrate that we care. We care for those we work with everyday, as well as the customers and communities we work with and in. We bring this value to life by being inclusive, empathetic, and respectful.	<ul style="list-style-type: none"> • Speaking and acting respectfully at all times, to all people • Putting yourself in someone else's shoes – ask "what does this situation look like from their perspective" • Being prompt in addressing the needs of team members, customers and the community 	<ul style="list-style-type: none"> • Pushing ahead with your own view, and dismissing other viewpoints • Focusing on 'my' objectives, not 'our' collective goals • Caring only for the work, and not for the person
Integrity <i>Do what's right, not what's easy</i>	We prioritise honesty and transparency and we trust each other to deliver on our promises. We always provide feedback and when given feedback we accept it in the spirit it's given; to grow, learn and improve.	<ul style="list-style-type: none"> • Choose actions that align to our values, even when an 'easier' path might be available • Fulfilling our commitments, and being up front and honest when there's barriers • When something doesn't look right, calling it out 	<ul style="list-style-type: none"> • Demonstrating inconsistency between our values and actions, undermining trust and credibility • Shying away from important and difficult conversations • Avoiding feedback, and not acting on it
Accountability <i>Ownership is every person's responsibility</i>	We take accountability; not just for keeping our promises but for seeing what needs to be done and taking action and initiative to make things happen. We're focussed on business performance for today and for the future.	<ul style="list-style-type: none"> • Doing what you say you'll do • Taking ownership for your actions, and consequences, whether they are positive or negative • Being thoughtful and decisive, even when faced with uncertainty 	<ul style="list-style-type: none"> • Blaming others and not taking responsibility for your actions • Walking past a challenge and seeing it as 'someone else's problem' • Waiting for someone else to take the lead
Innovation <i>Change that adds value</i>	We solve problems and create value by actively seeking out and being open to new ideas, ways of thinking and ways of working. We behave in ways that actively encourage our people to think, share and be curious in their role and in daily work practices.	<ul style="list-style-type: none"> • Being courageous to try new things, and learning from our mistakes • Embracing change and being open to adapting to new circumstances • Anticipating what's needed for tomorrow and starting today 	<ul style="list-style-type: none"> • Preferring the status quo because it is 'what we have always done' • Being closed off to new ideas and suggestions from others • Failing to recognise that 'perfect' is the enemy of progress



Conflict of Interest & Declaration Procedure

Under our Conflict of Interest (COI) Policy, all our People are required to put the duties and responsibilities of their job and employment or engagement with Wilson above their own private interests when carrying out their work-related duties and responsibilities.

The COI Policy sets out those obligations and the responsibilities all Wilson People have with regard to giving and receiving gratuities and gifts, as well as dealing with actual or potential conflicts of interest, including offering and being offered inducements or bribes.

All our People are required to declare or report any actual or potential COI they may have or suspect another person may have.

Declarations are important because they enable Wilson to consider the COI and reach a determination regarding an appropriate course of action.

For more detailed information on your obligations, please see the following:

- **Conflict of Interest Policy & Declaration Procedure**

Confidentiality and Intellectual Property

In order to maintain our reputation and to protect our People and the companies we work with, Wilson is committed to maintaining the privacy, confidentiality and security of information that is in our possession, including intellectual property such as, but not limited to, designs, know-how, trade secrets and inventions.

In our broad business dealings we are trusted with private information, such as employee and contractor details, and confidential information, such as customer files and commercial information.

To ensure we meet our obligations, as well as maintain our commercial interests and good reputation, all individuals are expected to:

- Follow procedures and requirements for keeping Confidential Information including passwords, access passes, and other information or equipment that could facilitate access to private or confidential information secure
- Do everything possible to keep information secure and not share information with anyone who does not need it to perform their work
- Ensure customer security, privacy and confidentiality procedures and requirements are followed and maintained

For more detailed information on your obligations, please see the following:

- **Confidentiality & Intellectual Property Policy**



Use of company property

As part of conducting ourselves professionally, all individuals are expected to be responsible in the use of company and customer property and resources by:

- Only using them in an authorised manner for which they are intended and never for personal or illegal purposes;
- Treating Wilson and customer resources/property with care and respect;
- Taking care to prevent loss, damage, misuse or theft of Wilson and customer assets;
- Notifying your manager if you become aware of the misuse of Wilson or customer resources/property; and
- Never abuse, deface or wilfully damage Wilson or customer resources, property or equipment.

For more detailed information on your obligations, please see the following:

- **Equipment, Mobile Phone & Company Assets Policy**

Discrimination, Harassment and Bullying

Wilson values diversity because it not only creates a rich and vibrant atmosphere at work, but because it also brings ideas and different ways of thinking into the workplace.

We are therefore committed to:

- achieving a diverse workforce that is inclusive and respectful;
- providing a work environment that is free from discrimination, harassment, bullying and victimisation;
- making employment decisions based on merit and not on irrelevant attributes;
- promoting a safe working environment free from bullying; and
- not treating a person unfavourably because they have raised a genuine complaint about unacceptable behaviour

Unlawful discrimination, harassment, bullying or victimisation are unacceptable and will not be tolerated.

For more detailed information on your obligations, please see the following:

- **Discrimination, Harassment & Bullying Policy and Complaints Procedure**



Speak Up Policy

Wilson is committed to creating and maintaining high standards of corporate governance and ethical conduct across all our businesses and locations globally.

Our Speak Up Policy is in place to encourage the reporting of any concerns regarding actual or suspected illegal, unethical or unacceptable conduct, collectively called Improper Conduct.

Wilson's attitude is **"when in doubt: report it"**.

For more detailed information and procedures about "whistleblowing" and reporting, please see the:

- **Speak Up Policy**

Personal Presentation Standards

The way we present ourselves for work communicates our professionalism and respect for our job, each other and our customers.

Where it is a Wilson requirement of the job to wear a uniform, including any time you may be directed to wear a uniform, it is a requirement that you attend work in company uniform. Where supplied, name badges must be worn whilst in contact with the public. Drinking alcohol while wearing Wilson uniform or any Wilson branded clothing or accessories is prohibited.

All Wilson People are otherwise expected to attend the workplace, including offsite meetings, in neat business attire, appropriate for the position you have been engaged to undertake. It is also expected that you will maintain a high standard of neat and professional grooming at all times.

For more detailed information on your obligations, please see the following:

- **Personal Presentation Policy**

Health and Safety in Employment

We all have a responsibility to conduct ourselves appropriately in order to maintain a safe working environment. All of our People are expected to play their part by complying with Wilson's Health, Safety and Wellbeing policies. Broadly, we expect that all individuals will:

- Take care of their own health and safety and that of others;
- Report hazards, incidents or accidents and stop or don't start any work which appears to be unsafe;



- Wear the specified footwear, clothing and personal protective equipment required for your job, without exception;
- Never come to work under the influence of alcohol or drugs and comply with all other requirements relating to drugs and alcohol in the workplace;
- Never bring weapons of any kind to work (unless required as part of your employment and approved by Wilson); and
- Abide by all safety rules and procedures operating within the company and comply with all relevant health and safety policies and legislation.

All Health, Safety & Wellbeing Policies are available on the intranet and provide more details information about your and Wilson's obligations.

Social Media Policy

Social media is used widely and is easily accessible at any time of the day or night. Because of this, it can be difficult to understand boundaries and what is acceptable when it comes to personal usage and your obligations to your employment or engagement with Wilson and your personal, legal restrictions.

Our Social Media Policy therefore informs our People of the acceptable standards of use as they engage in conversations or interactions using social media for business or personal use, aligned with our Values of **Care, Integrity, Accountability and Innovation**.

Only employees who have specific, written authorisation from Wilson may use social media for business use and only within the parameters of that written authorisation.

To protect you, Wilson and our business stakeholders, individuals must ensure that all aspects of their social media engagements do not negatively impact on or cause damage to Wilson, our brand or commercial interests; make sure that personal online activities do not interfere with the performance of your job or engagement; and consider all actions relating to social media engagements carefully in light of how they may reflect on you, Wilson, our people and our business stakeholders.

For more detailed information, please see the following:

- **Social Media Policy**



Additional Information

Where to go if you have questions

If you find yourself in a situation where you are unsure about how to behave or present yourself or you would like further information about any of our Code of Conduct Policies or our Values, please feel free to speak to your Manager or a Human Resources representative.

Policy Review

This Policy is maintained by Wilson's People Operations & Strategy Team and may be revised from time to time. It does not form part of an individual's contract of employment or engagement.

You are welcome to contact humanresources@wilsongroupau.com with any suggestions, feedback or questions.



Appendix A: Code of Conduct Acknowledgement & Acceptance Form

Before signing this form, you are expected and encouraged to read the associated policies that make up our Code of Conduct Framework, which include:

- Conflict of Interest Policy;
- Confidentiality & Intellectual Property Policy;
- Discrimination, Harassment & Bullying Policy & Complaints Procedure;
- Speak Up Policy;
- Personal Presentation Policy;
- Social Media Policy;
- Work Health Safety & Environment (WHSE) Policy;
- Equipment, Mobile Phone & Company Assets Policy;

If you have any questions about any of these policies, please seek the advice of your manager/supervisor, or speak to a Human Resources representative.

Acceptance:

I, (print name) _____, acknowledge that I have been provided with the opportunity to read the Wilson Code of Conduct.

I acknowledge and accept that I will work in accordance with the Wilson Code of Conduct and comply with the Code and the associated policies and procedures.

Signature:

Date:

Please return this completed form either by hand or scan and email to humanresources@wilsongroupau.com

A copy of this form will be stored in your personnel file.