



Code of Conduct

Message from the CEO

SCF is committed to honesty, integrity and exemplary conduct in every aspect of our corporate life, whether in our dealings with customers, suppliers, our employees or contractors, the regulatory authorities or the general public.

Generally, what is necessary to be acting with integrity and honesty is clear to everyone, but there are some circumstances where difficult issues may arise. This Code of Conduct is designed to assist all of us in making ethical, honest and correct decisions. It defines how we do business, and the conduct we expect of everyone working for SCF.

In this Code we have not attempted to describe every situation, law, rule or policy that may apply to us. There will be situations in which we will have to use our judgment on the most appropriate course of action, but the Code provides a framework which should guide us in making decisions in our day-to-day work.

Please take the time to read and understand our Code of Conduct and feel free to talk to your manager or supervisor if you have any questions.

Justin Speedy



Does this Code of Conduct apply to me?

This Code of Conduct (Code) applies to everyone who works for and with SCF Group Pty Ltd (SCF). It applies to all directors, officers, managers, supervisors, employees and anyone else who performs work for, or provides services to SCF, such as contractors, suppliers and consultants of SCF. It also applies to your conduct outside of work that might impact SCF or its reputation. It applies to any function you are at which is sponsored by SCF, organised by SCF or connected to SCF in any way. It applies to you in relation to everything SCF does.

Your personal responsibility

For everyone

If this Code applies to you, it is important that you understand that:

- This Code is mandatory.
- You are personally responsible for your own conduct in complying with all of the provisions of this Code.
- You are personally responsible for reporting known or suspected breaches of this Code to your supervisor or manager
- No-one—whether your supervisor, a colleague, a customer, or a manager—has the authority to order, request or influence you to breach this Code. A breach will not be excused because someone asked you to, or told you to, act in way that breaches this Code.
- Breaches of this Code will have serious consequences. Your employment may be terminated for a breach of this Code. Where the breach also constitutes a breach of a law, SCF will cooperate with the appropriate law enforcement agency (for example, the Police, or the Work Health and Safety authority) and you may consequently face prosecution if the breach is also an offence.

For managers and those in higher positions

If you are a director, manager, supervisor or someone in a trusted position, you should note that SCF holds you to a higher standard. SCF expects you to not only comply with the Code yourself, but to set an example for others, serving as a resource and educating other workers about the Code and expected standards of behaviour. You must live the Code, ensuring that there is a positive culture of integrity and ethics throughout SCF. You should be able to respond to questions about the Code and how it applies, be familiar with (and follow) other SCF Policies. You should accept complaints about breaches of the Code and ensure that they are treated properly.

Key points for everyone

A breach of this Code will constitute a valid ground for disciplinary action, including dismissal from employment for serious misconduct where appropriate. In some cases, the breach may also be a breach of some other law and could result in prosecution.

Ignorance will not be accepted as an excuse. It is your responsibility to know and understand the Code. If you are in any doubt as to appropriate conduct, you should ask your Manager.

You have a duty to report any breach of this Code, or where in good faith you suspect a breach of the Code. It is not acceptable to turn a blind eye to others breaching the Code.

Any retaliation or threat of retaliation against any person for refusing to breach this Code, or for reporting in good faith a breach or suspected breach of the Code will not be tolerated and is itself a breach of the Code and . It may also be a breach of one of several laws that prohibit victimisation and the SCF Acceptable Workplace Behaviour Policy.

The Code does not form part of your contract of employment but is a reasonable and lawful direction to you.



Summary of our Values & standards

Fundamental to our operations, SCF has set the following standards of behaviour that reflect our core Values, which you must adopt at all times:

- Safety and the environment will not be compromised – we are committed to doing business without injuries to people, damage to our assets or harm to the environment.
- We act with integrity and honesty at all times, demonstrating the very highest professional, ethical and community standards.
- We comply with the letter and the spirit of all laws and regulations that apply to us including our own SCF policies.
- We respect confidentiality and will not misuse any information that has been entrusted to us.
- We respect and are courteous to all individuals, respecting their culture, beliefs and backgrounds, accepting them for who they are.
- We work as a team, respecting each other, and dealing fairly, honestly, and equitably with each other.
- We respect SCF and will work to the best of our ability to maintain its reputation, image, profitability and success, treating its assets, resources and property with care and so as to minimise waste, and using our working time wisely.

What should I do if I am uncertain about how I should act?

SCF recognises that there will be circumstances where it will be difficult to know what to do. No Code of Conduct can cover every possible action or scenario. For that reason, SCF has a number of specific Policies, and you should refer to them for more detail about what is expected (for example, there are policies that cover bullying, and sexual harassment, internet usage, use of social media, etc which can be found on the SCF Management System.

When faced with a difficult question or situation, you should, after consulting the Code of Conduct and any relevant Policy, ask yourself these questions:

- Is my action or decision the right thing to do?
- Would my decision or action be one that would embarrass me if it became known to my family, friends, SCF or became known to the public generally through social media, TV or the print media?
- Will this decision or action protect or enhance SCF's reputation as an ethical company?

If the answer to any of these questions is “No”, you should stop and carefully consider the position again. Seek advice from your manager or the Human Resources team.

Our values & standards in more detail

Safety & the environment

SCF is committed to achieving the highest performance in safety with the aim of creating and maintaining a safe and healthy working environment for everyone including employees contractors, visitors and clients. The company takes pride in making the safety of people its highest priority and expects you to support this commitment by taking reasonable care about your own health & safety and that of those around you in your workplace.

We expect anyone in a position of leadership within the Company to demonstrate active and visible guidance on work health and safety matters, and to promptly respond to and address work health and safety issues with those of us involved or affected.

SCF is also committed to pursuing opportunities to improve our environmental performance and the reduction of pollution and waste from our business practices using recognised environmental best practice.

In line with contemporary community expectations,



As a responsible employer, SCF has taken steps to comply with its legal obligations and to meet prevailing community expectations regarding contemporary work health & safety initiatives so that it can create & maintain a safe work environment. For your part, you must comply with our Work Health & Safety Policy and all reasonable instructions given to you by SCF in relation to work, health and safety. If you see something in the workplace that you believe may be a hazard or you observe someone working in a manner that might be a threat to their own safety or the safety of others, then you must bring your concerns to their attention or raise them with your supervisor or manager.

SCF will always look for any chance to reduce our energy and resource consumption in the manufacture and operation of our products and general business activities and to our overall carbon footprint.

If you see an activity or practice that has the potential to do harm to the environment or perhaps, is an excessive use of energy or resources, you should bring it to the attention of a supervisor or manager.

We should always be thinking about how we can change our own behaviours in the workplace – if that water tap is leaking, don't leave it for someone else to arrange for it to be fixed.

If you see a light on in an unattended room, switch it off. Don't co-mingle your waste that can be recycled. The cumulative effect of these small actions across the company can play a major part in SCF fulfilling its environmental commitment.

Integrity and honesty

Integrity and honesty are expected, not just in your dealings with people outside the business, but also in how you behave towards SCF and other employees. For example, theft or misuse of company assets will not be tolerated and may lead to termination of your employment, as may false complaints or accusations about fellow employees.

We should always be honest, fair and truthful in all of our dealings. Those we deal with (be it customers, clients, suppliers, competitors, government agencies or the general public) expect absolute integrity from us. Honesty and integrity also apply to things we do not do, for example, if we see dishonesty in others and do not report it, this will reflect on your own honesty and integrity. We must never attempt to deceive or mislead others, either by our conduct or our silence. SCF expects proper behaviour at all times.

Some areas where this applies include (but are in no way restricted to):

- Making business decisions on honest grounds and uninfluenced by personal gain;
- Working at your best, producing good work, and being honest about your time and use of SCF assets;
- Not offering or accepting bribes or unauthorised gifts;
- Never mis-describing transactions or activities;
- Being honest with those utilising our products or services;
- Not obtaining a personal financial gain or advantage (other than your normal remuneration) from your work; and
- Reporting suspicious or dishonest conduct by others.

Complying with the law

SCF expects that you obey all laws and rules (including our own internal rules and policies) that apply to you or SCF at all times and does not encourage or condone sneaky or cunning behaviour of any other kind of "sharp practice" in seeking to evade the law. You must understand and follow the intention and the spirit of the laws that apply to you and your role.

While the law can be complex, ignorance of what the law requires is not an excuse or a defence. You are ultimately responsible for understanding what laws apply to the work that you do. If you have any doubt about what is allowed, you should ask your manager or Human Resources team. You must not at any time involve SCF in any illegal conduct.

That includes, for example, not paying due and proper taxation on our income, or making unjustified claims for deductions on our behalf. It means not offering or accepting bribes. Under no circumstances should you enter into any arrangement that involves the fixing of prices for goods or services.

Many of the policies that SCF has adopted reflect what the law requires, and you should be aware that breaching the policies may also be a breach of the law. An example of this is our policies around work health and safety, where a breach of our policies may also breach work health and safety legislation and can result in prosecution. Similarly, a breach of our workplace behaviour policy may breach Anti-Discrimination legislation and taking action against fellow employees because they have a workplace right is prohibited under the Fair Work Act 2009.

SCF does not tolerate any breach of the law.

Professionalism and intellectual integrity

SCF respects, values and will maintain professionalism and intellectual integrity in everything we do.

Professional conduct requires you to maintain high standards of behaviour at all times. This can relate to the way you dress, the way you speak to others, the way you do your work and the way you treat others.

Professional behaviour will require you to put SCF interests ahead of your own interests when it comes to work—it is not the mark of a professional to seek personal gain at the expense of your employer, for example, it is not appropriate to seek bribes, gifts for doing your job, secret commissions or the like. You must not put yourself in a position of conflict of interest, such as placing business with a close friend or family member, working as a consultant, paid or unpaid, in a private capacity for another company that deals with SCF, conducting your own business while still employed, or using inside information to make a personal gain. Some of that conduct is illegal as well as unprofessional.



SCF also requires utmost intellectual integrity. This means different things in different contexts. For example, if your role requires significant thought and planning, you will do that to the best of your ability. If your work brings you into contact with SCF intellectual property (confidential information, trade secrets, financial information, marketing plans, product details not publicly known, or commercial or technical information that is not known to the public) then you must respect that information and not share it with anyone who is not entitled to access, and certainly not outside SCF.

You must protect company information at all times. You must also respect the intellectual property of others. While we are competitive, and while we expect our employees to keep up with industry developments, it is never acceptable to take information that does not belong to us. You must not use any unethical, unlawful or improper means to obtain confidential information from a competitor, supplier, customer or other third party. You must not hire someone with the intention of asking for confidential information about their former employer.

Our intellectual integrity means you must not make misleading or deceptive comments about our own products or services, or about those of our competitors. We should be truthful, accurate and helpful in everything we say or write. You should not make promises you cannot deliver and should honour the commitments you have undertaken.

Respecting others

We respect and are courteous to all individuals, respecting their culture, beliefs and backgrounds, accepting them for who they are. This applies to those in our workplace, but also to our conduct towards our customers and clients, our suppliers, and to the general public.

We will respect our colleagues and those with whom we come into contact and show a sensitivity to each other's feelings, cultures and individuality. We will welcome diversity, and will treat all with dignity, fairly and with respect. We will not disadvantage people with conditions or requirements that cannot be justified.

SCF has a Policy about discrimination and sexual harassment – the Acceptable Workplace Behaviour Policy.

Behaviour which can be classed as: harassment, bullying, unlawful discrimination, unfair treatment, vilification, violence or victimisation will not be tolerated, and you are expected to abide by this Policy.

We do not accept; abusive language; intimidating, hostile or derogatory conduct or remarks; unwelcome sexual advances or other conduct of a sexual nature.

We do not accept the use or display of written or graphic material that denigrates or shows hostility or aversion to others, particularly if it is motivated by characteristics such as gender, race, nationality, religious or philosophical beliefs.

We do not use management techniques or styles that are constantly harsh, cynical or humiliating.

Teamwork

We work as a team, we respect each other, and we deal fairly, honestly, and equitably with each other. This means that we will behave appropriately with each other, respecting each other's views and ensuring that we comply with this Code and SCF Policies.

It means more than just mere compliance with Policies, laws and our Code of Conduct however. Being part of a team means looking out for each other, lending assistance when workloads are heavy, and ensuring that our fellow workers are safe. When we are in a supervisory position will not abuse our position by improper methods of management, or by favouritism or the like.

Confidentiality

We respect confidentiality and will not misuse any information that has been entrusted to us. On a daily basis, we will have access to information that is confidential. customers or suppliers. We will not use this information in an improper way.

SCF regards the protection of confidential information as vital, and we expect you to respect and honour confidential information, whatever its nature. Unless specifically authorised to do so, you must not release any confidential information relating to any information or material you have acquired as a result of being associated with SCF. This obligation is contained in your employment contract and continues even after your employment ends.

From time to time, we are entrusted with confidential information belonging to others, that is given to us in the expectation that we will respect the confidentiality of that information. This information should be given the same respect as SCF confidential information. It must not be shared or disclosed.





We do not condone any person being recruited from a competitor and then being asked to breach their own obligations and disclose confidential information belonging to our competitors. We must respect the confidential information belonging to others and any failure to do so will be treated as misconduct and subject to disciplinary action.

Respecting SCF

We will respect SCF in the way that we work and the way we treat SCF assets.

In terms of our work, we will respect SCF by ensuring that we work to the best of our ability, devoting all our working time to the task at hand. We will not produce second-rate work or products, and we will not use our time on personal tasks when we should be working for SCF.

We will ensure that we behave consistently with our responsibility to conserve and protect SCF assets. SCF assets include physical assets such as products, plant & equipment, office supplies, and technology including computers, phones and software, and intellectual property such as confidential information and trade secrets.

We will also respect SCF by making sure our public comments never disparage the company. We will not put any material on any of our personal social media pages that comments negatively on SCF.

We will never allow SCF property to be used for improper purposes, for example, we will never use it to access improper websites, or to view, download or store inappropriate text or images.

We will not put ourselves in a position where there is a conflict between our interests and those of SCF.

Further Questions?

You should treat this Code as an overview of required conduct which is not meant to be the sole source of your obligations. If you have any doubts as to proper conduct, or questions about how the Code applies in any particular setting, you should seek advice from your Manager or the HR team.

