



The Astivita Limited Corporate Code of Conduct sets out the standards expected of the Directors and employees of the Company in the performance of their duties. The Corporate Code of Conduct applies to all of the operations and to all Directors and employees of Astivita Limited (Astivita Limited or the Company) and its subsidiaries.

Astivita Limited's reputation for honesty and integrity is valuable to the Company and its shareholders, and therefore must be maintained and protected at all times. The Directors and employees of the Company will therefore conduct their business on behalf of the Company in accordance with the highest ethical standards and sound corporate governance.

### **BUSINESS RELATIONSHIPS**

All dealings with customers, suppliers and external parties shall be conducted in a professional and courteous manner.

Commitments to buy or sell on behalf of the Company must be made solely on sound commercial grounds having regard to quality, price and service and in accordance with Astivita Limited's authorisation procedures.

Act in accordance with the entity's stated values and in the best interests of the entity.

Act honestly and with high regards of personal integrity.

Act ethically and responsibly.

### **CONFLICTS OF INTEREST**

Astivita Limited expects its employees to avoid any circumstances where their personal, financial or other interest may be in conflict (either directly or indirectly) with their responsibilities to the Company.

Any such conflict should be reported to the employee's supervisor or General Manager. Similarly, any personal interests or obligations of employees which could create any suspicion that actions they take or decisions they make for the Company might be influenced by those personal interests should be reported to the General Manager.

Employees shall not solicit or accept any benefits from any party in connection with any service or business of the Company. Equally, it is against the policy of Astivita Limited to secure business by creating a conflict of interest on the part of an employee of an organisation dealing with the Company.

This policy does not preclude the exchange of ordinary hospitality between persons (such as meals in the normal conduct of business) or the acceptance of unsolicited, non-cash gifts of minimal value where it is clear that the donor is not attempting to influence the recipient.

### **CRIMINAL BEHAVIOUR**

You should be aware that some actions might be classed as criminal and result in legal action against you. These include bribery, fraud, abuse of public office, extortion, threats, reprisals, secret commissions and other unlawful behaviour.

Any Political donations must be approved by the Board of Directors.

Should you become aware of such behaviour in another employee, the matter must be reported immediately to the General Manager.

Managers and Directors are required to ensure that all activities of a potentially criminal nature are reported to the Company Secretary.

### **WHITSLE BLOWER POLICY**

The company has a whistle blower policy in place where employees can report any matter to the chair of the Governance Committee. The main areas under the policy are:

- Any corruption or acts of fraud.
- Any dealings with external 3rd parties that are outside standard business practices
- Any bullying or harassment.

The chair of the Governance Committee will

- Safeguard the whistle blowers name.
- Conduct an investigation and report to the Board

The policy will be reviewed annually.