

CODE OF CONDUCT POLICY

Marnong Estates believe that honesty, integrity and fair play are important assets and critical to the success of our business. All employees of Marnong Estates must ensure that the Organisation's reputation is enhanced and elevated by our complete honesty, loyalty and ethical action.

This Code of Conduct sets out the standards of behaviour expected from the employees, and guidelines to handle different situations.

Bribery, Illegal Gifts & Commissions

Any employee soliciting an advantage in connection with his work without the permission of the Organisation commits an offence. The term "advantage" includes money, gift, loan, fee, reward, office, employment, contract, service and favour.

It is the policy of the Organisation to prohibit employees from soliciting any advantage from clients, suppliers or any person in connection with Organisation's business.

Accepting Advantages

Employees should decline advantages offered in connection with their work if the acceptance of such advantages could affect their objectivity or induce them to act against the Organisation's interests or lead to complaints of bias.

Offering Advantages

Under no circumstances may an employee offer bribes or similar considerations to any person or Organisation for the purpose of influencing such person or Organisation in business dealings. Any advantage given in the conduct of the Organisation's business should be in accordance with the Organisation's prevailing policies on such matters and prior written approval of the Organisation should be obtained.

Entertainment & Hospitality Industry Practice

Although entertainment, discounts and complimentary services which are common in the hospitality industry are acceptable forms of business and social behaviour, employees should turn down invitations to meals or entertainment or offers for discounts and complimentary services that are excessive in nature or frequency, so as to avoid embarrassment or loss of objectivity when conducting the Organisation's business. Under no circumstance should an employee accept undue hospitality that is not common in the industry.

Use of Proprietary Information

Employees are not allowed at any time to disclose any proprietary information to anybody outside the Organisation without permission. Such information may relate to all aspects of the Organisation's operations including investment strategies, sales and marketing plans, new products, financial projections, patent applications, clientele database, copyrighted materials, etc. It is the responsibility of each employee who has access to or is in control of proprietary information to provide adequate safeguards to prevent its abuse or misuse. Examples of misuse include disclosure of information in return for monetary rewards; use of information for personal interest; and disclosure of information to sabotage the Organisation's interest.

Handling Conflict of Interest Situations

'Conflict of interest' situations arise when the personal interests of employees compete or conflict with the interests of the Organisation. Employees should avoid such situations, actual or potential, which may compromise the integrity of the employees and put the Company's interests and reputation at stake. Every employee of the Organisation should take it as his/her personal responsibility to avoid engaging in situations that may lead to or involve conflict of interest. He/she should at all times ensure

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that his/her dealings with customers, suppliers, contractors and colleagues do not place him/her in a position of obligation that may lead to a conflict of interest.

Misuse of Company Assets and Resources

Appropriation of Organisation properties, including raw materials and finished goods by employees for personal use or for resale is a crime of theft and renders the culprit liable to dismissal and prosecution.

Sexual Harassment, Workplace Harassment & Violence

Sexual harassment may include unwanted sexual advances, sexual jokes, subtle or overt pressure for sexual favours, sexual innuendoes, and offensive propositions. These will not be tolerated. Likewise, the Organisation will not tolerate workplace harassment, abuse or violence of any kind. This includes threats, intimidation, bullying, subjecting individuals to ridicule or unwarranted exclusion. Refer to Marnong Estates Workplace Bullying and Harassment Policy

Personal Conduct Outside Hours of Work, Including External Employment

Employees should not take up concurrent employment, either regularly or on a consulting basis, without the prior written approval from the HR Department and their line manager.

Environmental Compliance

It is our policy to conduct our business in an environmentally responsible way that minimises environmental impacts. We are committed to minimising and, if possible, eliminating the use of any substance or material that may cause environmental damage, reducing hazardous waste generation and disposing of all waste through safe and responsible methods, minimising environmental risks by employing safe technologies and operating procedures, and being prepared to respond appropriately to accidents and emergencies. Violation of environmental laws can be a criminal offence and can potentially involve monetary fines and imprisonment. We expect employees to comply with all applicable environmental laws.



Dino Strano
Managing Director

Date: 29/05/2024