

adaptalift **GROUP**

Policy

Code of Conduct



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1574 Centre Road,
Springvale VIC 3171

A NOTE FROM ADAPTALIFT'S CEO

Adaptalift's mission is to be the frontrunner and to drive the success of Australia's businesses, projects and communities by providing premium materials handling, access and industrial-cleaning equipment, backed by the industry's best people, service and support.

Implicit in this is abiding by our family-owned values that demonstrate our commitment to honest, ethical and fair relations with all our *Stakeholders*. Our ADAPT values define who we are. This includes being:

ALIVE with innovation – encouraging initiatives and new ideas to position ourselves as a market-leader in safety, products and services and to meet *Stakeholder* needs

DEDICATED to our customers – making their lives easier, safer and more efficient

AUTHENTIC and caring – we care about our customers, the environment we work in and our community and we want to be – and be perceived as being – committed to high moral and safety standards

PASSIONATE about excellence – taking ownership and being the best we can be in everything that we do

TOTALLY committed to safety – we put health and wellbeing of all our *Stakeholders* before anything else, ensuring adherence to industry-leading safety standards and identifying and rectifying anything that may be unsafe.

We want to be seen as being a leader in promoting a safe and harmonious workplace and to encourage and foster commercial arrangements that align with our mission and our ADAPT values.

In this *Code*, you will see more detail around what *Adaptalift* expects of all our *Stakeholders* and the standards we and they should uphold.

This *Code* applies and is to be read in conjunction with our other policies, all of which are available on our website.

Please review and ensure compliance with this *Code* and the principles we expect both *Adaptalift* and our *Stakeholders* to uphold. Adhering to this *Code* is non-negotiable for us because it defines who we are and who we want to do business with.

Steve Taylor



Chief Executive Officer

DOCUMENT PURPOSE

The purpose of this *Code* is to promote a safe, healthy and productive workplace wherever *Adaptalift* and its *Stakeholders* operate.

The *Code* provides fundamental baseline standards that are intended to inform, educate and regulate *Stakeholders* about *Adaptalift's* expectations and standards and the consequences of engaging in practices that are inconsistent with the *Code*.

The *Code* is *Adaptalift's* principle corporate governance policy governing the conduct of *Adaptalift* and all its *Stakeholders*.

INTENDED AUDIENCE – SCOPE

This *Code* applies to the activities of all lines of business and operations at *Adaptalift*.

It is also intended to apply to all of *Adaptalift's* *Stakeholders*.

DOCUMENT CONTROL

This document is regularly updated to reflect current work practices. It supercedes all previous versions. Please refer to the online copy of this document on *Adaptalift's* internet site to ensure you are reviewing the current procedures. Any offline or printed copies are considered as uncontrolled and potentially out of date.

Release Date	Date of Last Amendment	Reason for Amendment
30 April 2021	N/A	Official release

CONTENTS

A NOTE FROM ADAPTALIFT’S CEO 1

DOCUMENT PURPOSE 2

 INTENDED AUDIENCE – SCOPE 2

 DOCUMENT CONTROL 2

CONTENTS 3

COMMUNICATION OF THIS POLICY 4

THE CODE 4

1. DEFINITIONS 4

2. FUNDAMENTAL STANDARDS OF BEHAVIOUR 4

3. REQUIREMENTS – GENERAL OVERVIEW 5

 Compliance with all laws, regulations and ethical standards 5

 No Conflict of Interest 5

 People and Safety 6

 Record Keeping 6

 Making Public Statements About Adaptalift 7

4. UNACCEPTABLE CONDUCT - GENERAL 7

5. UNACCEPTABLE CONDUCT – DRUG AND ALCOHOL POLICY 8

6. COMPLIANCE RESPONSIBILITIES 9

 General 9

 Employee and External *Stakeholder* Responsibility 9

 Manager Responsibility 10

7. BREACHES 10

8. FURTHER INFORMATION AND REPORTING LINES 11

COMMUNICATION OF THIS POLICY

A copy of this *Code* will be made available on *Adaptalift's* website and in any other way that will ensure it is available and easily accessible by those to whom this *Code* applies.

It will also be provided:

- to all directors, officers and area managers within *Adaptalift*;
- to all employees and contractors as part of their commencement and safety induction; and
- to all employees, contractors and suppliers who request a copy of it, including as part of terms of trade entered with *Adaptalift's* contractors and suppliers.

THE CODE

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1. DEFINITIONS

In this *Code*:

Word	Meaning
<i>Adaptalift</i>	Means Adapt-A-Lift Group Pty Ltd (ACN 605 149 568)
<i>Board</i>	Means the board of directors and company secretary of Adaptalift (and any of Adaptalift's Associates or related-body corporates)
<i>Code</i>	Means this Code of Conduct
<i>Conflict of Interest</i>	Means any situation where a person's personal interests or commercial activities or affiliations outside of Adaptalift (including any family member, close contact, partner or other associate of that person) would compete with or influence that person's ability to act in the best interests of Adaptalift
<i>Stakeholder</i>	Means those persons governed by this Policy, including employees, officers, managers and the Board of Adaptalift and also including suppliers, contractors and customers of Adaptalift

2. FUNDAMENTAL STANDARDS OF BEHAVIOUR

Consistent with its commitment to maintain the highest standards of professionalism, honesty, integrity and fairness, *Adaptalift* requires all *Stakeholders* to at all times:

- (a) be beyond reproach in matters of trust, honesty and confidentiality;
- (b) respect cultural, ethnic and religious differences and not discriminate;
- (c) behave in a fair and consistent manner in all dealings (both internally and externally);
- (d) not take advantage of any property or information belonging to *Adaptalift* or personally benefit from such property/information; and
- (e) ensure compliance with all laws and regulations.

These represent the core standards of behaviour we expect all *Stakeholders* to abide by and which provide the framework for the requirements set out in this *Code*. They are consistent with – and operate concurrently with – our values.

3. REQUIREMENTS – GENERAL OVERVIEW

Compliance with all laws, regulations and ethical standards

We expect all our employees and *Stakeholders* to conduct themselves in accordance with all laws and regulations that apply both in Australia and in any jurisdiction in which we (and they) do business.

Additionally, we also expect that our employees act honestly and with integrity in all business relationships with our *Stakeholders*.

Adaptalift adopts a zero tolerance approach to any breach of these requirements.

Compliance under this requirement also means compliance with our other policies, including (without limitation) our **Anti-Bribery and Corruption Policy**, our **Privacy Policy**, our **Work Health & Safety Policy**, our **Drug and Alcohol Policy** and our commitment to not engage in any modern slavery practices as set out in our **Modern Slavery Statement**. Our employees are governed by additional policies that may not apply to all *Stakeholders*.

No Conflict of Interest

Adaptalift does not permit the existence of any *Conflict of Interest* without the prior consent of the *Board*.

Some examples of where this may occur include where a person competes with *Adaptalift* in another business venture; takes confidential information of *Adaptalift* with a view to using it for their or someone else's personal gain or having ownership rights in a direct competitor of *Adaptalift* (other than as a passive investor in a publicly traded company).

If a *Conflict of Interest* exists or may be perceived to exist, we require the reporting of the *Conflict of Interest* to the *Board*.

This obligation supplements any contractual obligation that any *Stakeholder* has entered with *Adaptalift* (for example, any non-disclosure agreement or any obligation contained within an employment contract that that person has with *Adaptalift*).

People and Safety

Our People

Adaptalift is an inclusive workplace that encourages and maintains a diverse workforce that adheres to the principles of equal opportunity. Unlawful discrimination, harassment, bullying is strictly prohibited and all hiring, promotions, retentions and rewarding of our employees is done on merit, transparently and with proper process. *Adaptalift* encourages the reporting of any conduct that contravenes this requirement, with potentially serious consequences if such conduct is found to be substantiated.

We expect all our employees and *Stakeholders* to abide by the principle of **only doing or saying something that you would want done or said to you**. Consistent with this is a requirement to:

- (a) treat all employees and *Stakeholders* with respect, dignity, fairness and equitably;
- (b) respect and support basic human rights;
- (c) act at all times in the best interests of *Adaptalift* in furthering and promoting this responsibility; and
- (d) never misuse or abuse any privilege, authority or status.

Safety

The safety of our employees is a fundamental tenet of the family values we hold.

We are committed to ensuring our work environments meet the highest standards in protecting the health and safety of all our *Stakeholders*. We conduct regular auditing of our sites, encourage active cooperation with oversight bodies and investigators and have a dedicated health and safety team committed to improving safety. Our “Take 5” initiative encourages our employees to take a step back and think about whether a certain activity will or may expose someone to danger or risk.

We require all *Stakeholders* to know and adhere to all applicable health and safety laws and regulations and to immediately report any unsafe working practices or conditions. This extends to compliance with our **Work Health & Safety Policy**.

Record Keeping

Adaptalift prepares accurate and fair accounting records that accurately describe and record all assets and liabilities. These records comply with all accounting standards and the *Corporations Act* and are audited annually.

We expect our *Stakeholders* to hold fair and accurate accounting records that comply in all respects with proper accounting standards and laws.

All records – whether of an accounting nature or otherwise – connected in any way with the business of *Adaptalift* must be retained for the minimum legal requirement and must only be disposed of at the end of this period and securely.

Making Public Statements About Adaptalift

No *Stakeholder* may make any direct or indirect statement that they represent *Adaptalift* without prior written consent of the *Board*.

Any statement made must be made honestly and must ensure that it will not cause damage or embarrassment to *Adaptalift*.

4. UNACCEPTABLE CONDUCT - GENERAL

Below is a summary of conduct that *Adaptalift* considers will constitute a breach of this Code.

This list is not intended to be exhaustive. It is provided as an example only of the kind of conduct *Adaptalift* expects itself, its employees and all *Stakeholders* to adhere to under this *Code*.

Some general examples of unacceptable conduct include:

- (a) verbal or written abuse, physical abuse or assault;
- (b) reckless or criminal behaviour or being grossly negligent in the discharge of any duties;
- (c) unreasonably refusing to obey or heed reasonable instructions given by *Adaptalift* or any of its employees;
- (d) repeatedly performing at a poor standard and/or concealing defective work;
- (e) discrimination, harassment (verbal, sexual or otherwise), bullying or victimisation, including where such conduct is conducted in contravention with *Adaptalift's Discrimination, Bullying and Harassment Policy*;
- (f) threatening or intimidating behaviour towards others;
- (g) reckless, careless or negligent behaviour that will or may endanger your safety or the safety of others; for example:
 - (i) tampering with, ignoring or failing to use any safety equipment or device;
 - (ii) tampering with any emergency or safety signage/equipment;
 - (iii) participating in horseplay, skylarking or making practical jokes or taking unnecessary risks in respect of the use – or around the use – of any equipment;

- (h) acting in breach of any laws and regulations, or acting contrary to any other *Adaptalift* policies that apply to you (including, without limitation, its **Anti-Bribery & Corruption Policy**, **Work Health & Safety Policy** and its **Discrimination, Bullying and Harassment Policy**);
- (i) for employees or any *Stakeholders* that have entered into separate agreements governing such conduct – acting in a way or doing anything that may impact on *Adaptalift* and/or its reputation, including acting contrary to *Adaptalift's* **Modern Slavery Statement**;
- (j) use of *Adaptalift* assets, property or electronic databases for personal benefit or private use (where not otherwise authorised by *Adaptalift*);
- (k) using *Adaptalift* databases or electronic communications for an illegal purpose or in a way that interferes with other users;
- (l) taking or distributing images of any property owned or in the possession of *Adaptalift*, or any person engaged or employed by *Adaptalift*, without first obtaining both *Adaptalift's* and that persons consent;
- (m) accessing, storing, processing or transmitting any information of a threatening, obscene, pornographic, discriminatory or harassing nature;
- (n) theft or attempted theft of *Adaptalift* property or assets;
- (o) fraud or attempted fraud against *Adaptalift* or any of its personnel;
- (p) making unauthorised public statements about *Adaptalift* or your connection to or involvement with *Adaptalift*;
- (q) unauthorised use of any trademark, copyright or other intellectual property belonging to *Adaptalift* or disclosing or passing any information that is, or ought be known to be, confidential to *Adaptalift*; and
- (r) failing to comply with *Adaptalift* values.

5. UNACCEPTABLE CONDUCT – DRUG AND ALCOHOL POLICY

Adaptalift is committed to ensuring that the safety and wellbeing of its employees or any person or entity with whom it does business – and, ultimately, the quality of the services that *Adaptalift* provides to its customers – is not compromised by the presence of people under the influence of alcohol or drugs.

Fundamentally, *Adaptalift* wants to maintain a safe, healthy and harmonious work environment that meets the highest safety standards and best practice.

Adaptalift does not and will not under any circumstances accept or condone:

- (a) the use, sale or possession of any illegal/prohibited substance at the workplace or any work-related event;

- (b) the presence of any *Stakeholder* affected by or under the influence of alcohol at any workplace or work-related event (except where that event is organised and approved by *Adaptalift* and otherwise where the *Stakeholder* is complying with the below); and/or
- (c) the consumption of alcohol at the workplace or at a work-related event (except where that event is organised and approved by *Adaptalift* and otherwise where the *Stakeholder* is complying with the below).

Adaptalift acknowledges that alcohol may be consumed at some activities involving employees, including at *Adaptalift*-initiated events or functions. When attending such an event/function, it is expected that all *Stakeholders* consuming alcohol will conduct themselves in a responsible manner, having regard to their own health and safety and the health and safety of others and otherwise in accordance with any other *Adaptalift* policy that may apply (and, for employees, in accordance with any employment contract). If alcohol is consumed by a *Stakeholder*, it is the responsibility of that *Stakeholder* to arrange for safe transportation home.

Unless *Adaptalift* (by either a director or the CEO) has approved the consumption of alcohol at any workplace, it is **not** under any circumstances to be consumed.

Adaptalift considers compliance of this policy as fundamental to its business and operations and therefore adopts a **zero tolerance** approach to compliance with this policy. This means that – in addition to any other remedy available to *Adaptalift* as set out below – your employment may be terminated or your contract with *Adaptalift* may be terminated without further warning.

6. COMPLIANCE RESPONSIBILITIES

General

Adaptalift requires all business units to monitor and report on compliance with this *Code*.

It is the responsibility of both *Adaptalift's* and *Stakeholder's* managers and HR to monitor and enforce compliance.

Any breach should be immediately reported to *Adaptalift* in accordance with the reporting lines set out in paragraph 8 of this *Code* or, if concerned of repercussions, in accordance with the **Whistleblower Policy**.

Employee and External *Stakeholder* Responsibility

Adaptalift employees and *Stakeholders* are responsible for:

- (a) understanding and complying with this *Code*;
- (b) immediately reporting any circumstance or thing that contravenes – or may contravene – any provision of this *Code*.

Additionally, employees must complete mandatory online training on their obligations under this *Code*.

If any employee or *Stakeholder* is concerned about any repercussions for reporting any actual or potential breach of this *Code*, he/she should submit a report in accordance with the **Whistleblower Policy**.

All employees who deal with any external *Stakeholders* must make them aware of this *Code* and that *Adaptalift* requires the *Stakeholders'* compliance with this *Code*.

Manager Responsibility

Managers are responsible for:

- (a) understanding and complying with this *Code*;
- (b) immediately reporting any circumstances or thing that contravenes – or may contravene – any provision of this *Code*; and
- (c) encouraging all *Adaptalift* employees and *Stakeholders* to report any contravention and otherwise ensure compliance with this *Code*.

7. BREACHES

Any breach of this *Code* will result in disciplinary action. Depending on the severity of the breach and the terms of any engagement you have with *Adaptalift*, such disciplinary action may include a reprimand, formal warning, demotion, termination of contract or termination of an employment contract.

Disciplinary action will also be taken against any manager or employee of *Adaptalift* who approves or condones a breach of this *Code*, has knowledge of an actual or potential breach and 'turns a blind eye' to that breach or has material relating to an actual or potential breach and does not disclose this to the appropriate persons within *Adaptalift*.

A material breach of this *Code* will be reported directly to the *Board*.

If a breach of this *Code* also breaches applicable laws and regulations, civil or criminal proceedings may be commenced against the person committing the breach by appropriate authorities or (where appropriate) *Adaptalift*. *Adaptalift* will not pay any penalties or fines that may be imposed against a person who breaches this *Code* or any legal costs associated with defending any such proceedings (if such proceedings successfully result in a conviction or the payment of a penalty/fine).

Whilst a breach of this *Code* has potentially significant consequences, this is necessary because compliance is fundamental to ensuring that *Adaptalift* workplaces are safe and harmonious and that *Adaptalift* conducts business in an ethical and responsible way. It is imperative that anyone who is aware of an actual or potential breach of this *Code* immediately reports that breach.

8. FURTHER INFORMATION AND REPORTING LINES

If any *Stakeholder* has any questions regarding the obligations and requirements of this *Code* or its interpretation, or wishes to make a report of breach under this *Code*, below is the list of persons to whom that question/report can be made (in order that they would typically be contacted):

1. Supervisor/Manager or Customer Contact
2. Senior Management (Operations / Sales / Support Manager)
3. *Adaptalift's* Human Resources Department (via email: hrdept@adaptalift.com.au)
4. *Adaptalift's* in-house legal counsel; or
5. Any member of the *Board*.

If a *Stakeholder* is concerned of retaliation, a report can also be made under the **Whistleblower Policy**. Reporting under this policy will supercede the above reporting lines.