



Global Code of Conduct

COATES GROUP

FEBURARY 2023

1 Coverage

This code of conduct applies to Coates Group entities (“**Coates**”) and all of our people, being directors, employees and contractors (“**our People**”).

This code applies at all times within Coates workplaces, at work related functions (including when representing Coates or performing duties at a location other than at a Coates workplace), when travelling on work related business. It further applies when representing Coates outside of work, including when engaging with colleagues, stakeholders and other third parties at any time.

2 Background

Coates has strong values at its core and places great emphasis on doing business with integrity, honesty and professionalism. This code sets out Coates’ expectations for all of our People, in every part of the business.

3 Purpose

To provide guidance on the values and principles underlying the way we do business and to ensure all of our People are aware of our expectations in relation to ethical behaviour and conduct. Specifically, this code aims to promote:

- Honest and ethical conduct at all levels of Coates’ business and operations.
- The avoidance of conflicts of interest and corruption, or any other matters that could impact upon the reputation of Coates and its People.
- Commitment to work practices that promote a harmonious, productive, diverse and inclusive workplace where the contribution of every individual is valued and respected.
- Clear expectations for all our People and accountability for adherence to this code.

4 Personal and professional conduct

All of our People must treat others with respect and in a way that promotes harmonious and productive relationships as well as a safe working environment. To this end, Coates expects all People to:

- Behave courteously, respectfully and considerately towards their colleagues, clients and all other people they deal with, including members of the general public.
- Refrain from using offensive or inappropriate language, threatening or intimidating behaviour including verbal or written abuse, physical abuse or assault;
- Respect and value diversity and not engage in conduct that is discriminatory or offensive. This includes not bullying or harassing others, not vilifying, or discriminating against others based on their background or personal characteristics, including but not limited to: their sex, race, ethnic or ethno-religious background, marital status, pregnancy, education, disability, age, sexual orientation, gender identity or carers' responsibilities.
- Not encourage or support others in harassing or bullying, or in acting in a way that is contrary to harmonious working relationships.
- Not use Coates internet and email resources for accessing, transmitting, storing or downloading pornographic, sexually explicit or otherwise inappropriate material.
- Not provide incorrect or misleading information, at any time, which is relevant to the Employee’s employment;
- Not absent yourself from the workplace without proper notification when you are meant to be working; nor engage in any form of outside practice or employment or other activities when you are meant to be on duty and working for Coates.
- Contribute to a safe working environment by:

- taking responsibility for health and safety and reporting to People and Culture any injuries, hazards, near misses or any other issues,
- not engaging in horseplay, skylarking or practical jokes, in a manner which causes, or has the potential to cause, physical, or mental harm to anyone or damage to property.
- not bringing a weapon into any work environment
- not tampering with, or ignoring safety signage/equipment; or
- using any vehicle or equipment unless authorised and trained to operate it or
- using equipment for an unauthorised purpose and/or in an unsafe manner

5 Honesty, integrity and trust

All of our People must act, and perform their duties, honestly and with the utmost integrity. To this end, Coates expects all People to:

- Comply with all laws and regulations that govern the Coates business.
- Be honest, impartial and conscientious when carrying out their duties and demonstrate the highest standards of professional judgment and efficiency.
- Ensure all financial and business reports are prepared fairly and accurately, in compliance with any applicable legal requirements and accounting standards.
- Avoid conduct that could bring Coates or any of its people, clients, and other stakeholders into disrepute, including when using social media regardless of whether or not Coates is directly referred to.
- Only provide official comment on matters related to Coates if authorised to do so.
- When making public comment on issues or participating in political or industrial activities, not indicate or imply that your views are those of Coates.

6 Conflicts of interest and ethical standards

At Coates, we only conduct business by lawful and ethical means. We expect all our People to observe the highest standards of ethical behaviour and to avoid any activity that might damage the reputation of Coates or conflict with Coates' interests. In particular:

- Employees must not undertake any other paid or unpaid employment or business activities, unless they have their Manager's prior written approval.
- None of our People must ever use or attempt to use their position with Coates to obtain improper personal benefits.
- All of our People must immediately disclose any and all actual or potential conflicts of interest to their Manager, and only engage with clients in arm's length transactions;
- Employees must not do business with, or approve transactions on behalf of, family members or relatives, without the prior written approval of the Group Chief People Officer.
- It is critical that all our People attend for work and work-related functions in a fit and proper condition, unaffected by drugs or alcohol.

- Not commit any act of theft which includes taking physical or digital property or possessions from Coates or other staff without permission.

7 Gifts and corruption

None of our People are permitted to:

- accept bribes or inducements that are intended to influence your decisions or actions
- Accept gifts from others (e.g. suppliers, clients, vendors) where they are, or could be reasonably interpreted as being, designed to secure influence or preferential treatment in favour of the giver. Inexpensive gifts or tokens of no more than \$100 USD offered as an expression of gratitude can be accepted. All gifts must be reported to your manager. For gifts that have a value higher than \$100 USD, you must provide the physical gift to your office manager. Please refer to section 6 of the Anti-Bribery and Corruption Policy.
- provide gifts or benefits to any third parties to increase the chances of securing a client or to generally benefit Coates or any of our People individually.
- use company funds to donate to any third party without the approval of the CEO.

If you at any time have doubt as to what type of gifts are acceptable, you must speak to a member of the People and Culture team.

8 Quality and confidentiality

All of our People must maintain the highest standards of quality in everything that they do and play an active part in managing these expectations of their work. In particular:

- Employees must comply with all lawful and reasonable directions in relation to the performance of their duties.
- Carry out duties with due diligence, competence and efficiency.
- Employees must use Coates' systems and equipment appropriately and only for proper purposes. The same extends to contractors, where access to systems and equipment is provided by Coates.
- All of our People must protect the privacy and confidentiality of Coates' information and maintain appropriate confidentiality regarding client and staff information. Coates expects that at all times you take all necessary steps to protect such information from misuse or unauthorised access, and report any improper disclosure immediately to your Manager or SLT member.

9 Accountability and reporting

Coates acknowledges that it cannot formulate policies to cover every situation that may arise in the workplace and this Code does not replace the need for common sense in how our people behave. Managers and leaders play a key role in ensuring that our people always understand and observe the Code of Conduct; they are also expected to lead by example, and to provide support and guidance to their teams in appropriate workplace behaviour.

We acknowledge that decision-making can be challenging and that no two situations are identical. If you have any questions about the application of this code, or are in doubt in relation to how to manage a difficult situation, we encourage you to reach out to the People and Culture team for guidance before acting.

We also encourage you to speak up and notify the People and Culture team if you see or suspect a breach of the code. Managers have a responsibility to address a possible breach of this code by any person as soon as they become aware of it. Coates has a zero tolerance policy for victimisation as a result of any person having made good faith complaints.

Where appropriate, we expect all employees to attempt to settle any complaints, disagreements or grievances in the first instance by raising the matter directly with those involved. If a resolution cannot be

found, then pursue such matters in accordance with the Grievance Management Policy.

10 Breaches

The matters outlined in this code are of the utmost importance to Coates and are essential to Coates' ability to conduct its business in accordance with its values. Coates expects all People to adhere to the rules and spirit of the code in carrying out their responsibilities to the extent applicable.

Coates requires strict compliance with the code. Failure to comply with the code (to the extent applicable) will be viewed seriously and could result in disciplinary steps being taken against you, which could include the termination of your employment or engagement.

11 Amendments

Coates reserves the right to change or vary this code at any time. Coates will keep you informed of any changes to this code.

12 Questions

Please contact your Manager or the People and Culture Team if you have any questions about our expectations of you, and what is required of all of our People under this code.

13 Approved by

Chief People Officer

14 Approved on

10 February 2023

15 Effective on

1 March 2023

16 Review Cycle

1 March 2024