



# Global Code of Conduct Policy

May 2025

# 01 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.

# 02 Purpose & Overview

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 our People, in every part of the business.

The purpose of this policy is to set out an ethical framework within which our People are expected to perform their work. The code sets out guidelines to provide clarity on the principles underpinning the way we do business and to ensure all of our People are aware of our expectations in relation to professional and ethical behaviour. 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.

# 03 Work Ethic

Coates is committed to developing and maintaining a high-performance culture, and so all of our People must ensure their focus is on performing their duties to the best of their ability. In particular, our People must:

- Dedicate their full attention and effort to their responsibilities during their working hours.
- Not engage in any form of outside practice or employment or other activities when meant to perform your role for Coates. (unless prior written approval has been obtained as outlined in section 7); nor be absent from work without proper notification when you are supposed to be working.
- Comply with all lawful and reasonable directions in relation to the performance of their duties.

## 04 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, suppliers and all other people they engage with, including members of the general public.
- Refrain from engaging in, or supporting others to engage in any offensive or inappropriate behavior, including but not limited to:
  - using offensive or inappropriate language (whether verbal or written).
  - threatening or intimidating behavior (including physical abuse or assault),
  - [Bullying, harassment, vilification, or discrimination](#) based on personal characteristics such as sex, race, ethnic or ethno-religious background, marital status, pregnancy, education, disability, age, sexual orientation, gender identity, or carers' responsibilities.
- Attend work or work-related function in a fit and proper condition, including being free from the influence of illicit substances. Responsible consumption of alcohol is permitted at work-related functions where alcohol is provided, provided that crew do not engage in any inappropriate behaviour that reflects poorly on them or Coates.
- Not providing incorrect or misleading information, at any time, which is relevant to your employment;
- Contribute to a safe working environment by:
  - taking responsibility for health and safety and reporting to People and Culture any injuries, hazards, risks, near misses or any other safety related 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
  - 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

## 05 Honesty, Integrity and Trust

All 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, competence, care 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 Coates is directly referred to.
- Only provide official comment on matters related to Coates if authorised to do so.
- Not indicate or imply that your personal views are those of Coates when making public comments on issues or participating in political or industrial activities.

## 06 Conflicts of Interest

At Coates, we only conduct business by lawful, honest and ethical means. Lawful business practices are those that comply with all applicable laws. Honest business practices are free from fraud or deception. Ethical business practices conform to accepted professional standards of conduct. Further information can be found in the [Anti-Bribery and Corruption policy](#). Therefore, it is essential that our People remain free of, or disclose, commitments and relationships that involve, or could involve, a conflict of interest with Coates business operations.

A conflict of interest can exist if one or more of our People has a direct or indirect personal interest in a decision being made where that decision should be made objectively, free from bias and in the best interests of Coates. It is important that even the appearance of a conflict of interest be avoided. In particular:

Our People must not undertake or engage in any other paid or unpaid employment or business activities, unless they have a member of the Senior Leadership Team's (SLT) prior written approval.

- Our People must never use or attempt to use their position with Coates to obtain improper personal benefits.
- Our People must not do business with, or approve transactions on behalf of, family members or relatives, without the prior written approval of the Chief People Officer.

Any of our People who believe that they may be affected by a conflict of interest must immediately disclose all relevant details to their immediate manager.

## 07 Gifts and Corruption

Our People must uphold the highest standards of integrity and are strictly prohibited from:

- Accepting bribes or inducements that are intended to influence decisions or actions
- Accepting gifts from external parties (e.g. suppliers, clients, vendors) that could reasonably be perceived as an attempt to secure influence or preferential treatment in favour of the giver. Modest gifts or tokens up to the value of \$200AUD offered as an expression of gratitude may be accepted. For gifts exceeding the value of \$200AUD, express written approval must be obtained by a member of the Senior Leadership Team (SLT).
- Providing gifts or benefits to any third-party with the intent to secure a client or to gain individual or organisational advantage.
- The use of company funds to donate to any third party without the approval of the CEO.
- Further information can be found in the Anti-Bribery and Corruption policy.

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

## 08 Confidentiality

All of our People are required to uphold the privacy and confidentiality of Coates information, as well as maintain strict confidentiality regarding client and People information. Our People are expected to take all necessary measures to safeguard such information from misuse, loss, or unauthorised access. Any instances of improper use or disclosure must be reported immediately to your Manager or a member of the Senior Leadership Team (SLT).

## 09 Use of Company Assets

During the course of employment, our People will be provided with Company assets, such as but not limited to laptops and electronic devices to enable them to execute their duties effectively. Our People are expected to exercise due care and responsibility in relation to these assets:

- Our People must not deliberately misuse or damage any Coates' property in their possession, care or custody.
- Our People must not use Coates assets, intellectual property or the services of other People for private use or gain. Our People must not remove any item of Coates property without prior approval from their Manager.
- Coates assets, systems and processes provided to our People must only be used for their intended, proper purpose and must not be used for any inappropriate or improper activities. The same extends to contractors where access to assets, systems and processes are provided by Coates.

Please refer to the [Global Property and Equipment policy](#) for more information.

## 10 Accountability and Reporting

This policy sets broad guidelines and does not cover every situation that may arise, and so common sense and good judgement should be exercised at all times.

Leaders play a key role in ensuring that our people understand and observe the Code of Conduct, and are expected to lead by example, and to provide support and guidance to their teams in appropriate workplace behaviour.

If you have any questions about the application of this policy 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 People to speak up and report any conduct you see or suspect that is a breach of this policy. This can be done by contacting your manager, a member of the People and Culture Team, or via [FaceUp](#) (access code: CoatesGroup).

Leaders have a responsibility to address a possible breach of this policy by any person as soon as they become aware of it. Coates has a zero-tolerance policy for victimisation or retaliation as a result of any person having made good faith complaints.

Where appropriate, we expect all our People 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](#).

## 11 Breach of Policy

The matters outlined in this policy 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 policy in carrying out their responsibilities to the extent applicable.

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

## 12 Amendments

Coates reserves the right to change or vary this policy at any time. Coates will keep our People informed of any changes to this policy.

## 13 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 policy.

## 14 Approved by

Chief People Officer

**15 Approved on**

April 2025

**16 Effective on**

May 2025

**17 Review Cycle**

Yearly