

## Code Of Conduct

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## 1. Purpose

At Interactive, we exist to keep technology human. We aim to have a workplace that employees are proud of, to provide opportunities that people are passionate about and challenges that our people can be personally rewarded for. We strive to provide an environment where people can feel comfortable and safe, an environment that encourages diversity and that actively promotes the Interactive purpose and values.

Our work environment is shared with many of our customers. We have a responsibility to them to ensure that the standards of our work environment are maintained at the highest level, including security, conduct and general use.

Recognising that work is something we do, not a place that we go, these considerations extend outside of our offices. When working remotely all company policies continue to apply and we continue to have a responsibility to our customers and team to maintain professional behavioural standards and high standards of work. Among other things, we should in particular maintain the security of company data and physical assets and maintain high work health and safety standards.

When our people raise concerns, our goal is to resolve these issues promptly and with consistency. This policy describes the standards of behaviour and conduct expected from Interactive employees in their dealings with customers, suppliers, co-workers, leadership and the general public to ensure that we protect and nurture our culture, work environment and brand.

While we have tried to address a wide range of business practices and procedures in this policy, we cannot anticipate every circumstance that may arise. All employees are responsible for ensuring they always act ethically and lawfully.

## 2. Scope

This policy applies to all employees, contractors and service providers. It applies to contractors and service providers to the extent permitted by the particular contractual arrangements in place. The policy does not form part of an employee's contract of employment.

This policy is to be read in conjunction with all applicable Interactive policies.

This policy is not limited to the workplace or work hours. It extends to all functions and places that are work related for example, home offices, work lunches, conferences, team celebrations and client functions.

## 3. Related documents

Documents related to this policy are as follows:

<b>Document</b>	
<ul style="list-style-type: none"> <li>• Anti-Discrimination, Bullying &amp; Harassment Policy</li> <li>• Close Personal Relationships Policy</li> <li>• Flexible Working Policy</li> <li>• Domestic Violence Policy</li> <li>• Social Media Policy</li> </ul>	<ul style="list-style-type: none"> <li>• Travel Policy</li> <li>• Whistleblower Policy</li> <li>• WHS Policy</li> <li>• Workplace Gambling Policy</li> <li>• Workplace Grievance, Disciplinary Procedure and Performance Management Policy</li> </ul>
<ul style="list-style-type: none"> <li>• Interactive Cultural Values</li> <li>• Corporate Style Guide</li> </ul>	

This policy is governed by the following legislation:

- The Fair Work Act 2009 (Cth) (for employees and contractors in Australia)

- Anti-discrimination legislation applicable in your jurisdiction
- Workplace health and safety laws applicable in your jurisdiction

#### 4. Definitions

**Conflict of Interest** is an Actual Conflict of Interest, a Potential Conflict of Interest or a Perceived Conflict of Interest. Please refer to section 5.3 for various types of Conflicts of Interest

**Actual Conflict of Interest** arises if an employee's personal interests improperly influences their decisions or actions in the performance of their duties.

**Potential Conflict of Interest** arises if an employee's personal interests could improperly influence their decisions or actions in the performance of their duties.

**Perceived Conflict of Interest** arises if an employee's personal interests could be seen to improperly influence their decisions or actions in the performance of their duties.

**Interactive** means Interactive Pty Ltd

**"You" or "your"** or similar refers to Interactive employees, contractors and service providers, as applicable.

**"We" or "us" or "ours"** or similar refers to Interactive.

## 5. Code of Conduct

Interactive's culture and brand is a reflection of our people and how we behave and conduct ourselves both at work and when dealing with external contacts. Your actions and conduct determines the trust that our customers will place in Interactive. Your personal contribution, standards and willingness to go the extra mile will determine what is possible for us to achieve together. We trust and expect that you will do the best that you possibly can in all of these areas.

We have a duty of care to our people, and we're committed to maintaining a safe and healthy environment where everyone is treated fairly and with respect, and are free from unlawful discrimination, harassment and vilification.

The following guidelines summarise our expectations:

1. We aim to be the trusted technology partner of our customers. We're the people they trust to get the most out of their technology. Every interaction with a customer matters. You are expected to make decisions that are in the best interest of our customers. Regardless of your role, we all work for our customers and it should show in our behaviour.
2. Each Interactive team member and contractor is responsible for protecting the security of Interactive's assets, premises and systems, and those of our customers. You must familiarise yourself with our security policies and procedures and be alert to possible insider threats.
3. You must act professionally at all times in the workplace (wherever that may be), and when representing Interactive. This means treating others with courtesy and respect and behaving in a way that is consistent with our values, our brand guidelines and in accordance with the law.
4. All requests for media statements should be referred to the Marketing department. You must never make any unauthorized statements to the media about Interactive's business, either directly or via social media or other public forums. Any reference to Interactive or Interactive employees must adhere to the guidelines set out in the Social Media Policy.
5. You must be aware of and act in line with all Interactive policies and procedures. The policies apply to you while at work and when engaged in any activity connected with Interactive, including on social media or otherwise online. The policies and procedures also apply when entertaining clients, or at company sponsored events or other functions. If the function involves alcohol, you must moderate your intake.
6. We recognise the importance of the personal and professional development of our people and are committed to providing opportunities for people to grow your skills and career. You are expected to maintain the skills, knowledge and professional qualifications and certifications appropriate to carrying out your role to the highest standard.
7. Maintaining the health and safety of our team and visitors is important to us. You are expected to observe and contribute to health and safety policies and procedures in the interest of providing a safe work environment for all. This obligation extends to all sites where work is performed, including the workplaces of our customers.
8. Honesty and integrity guide the way we do business, including the negotiation of customer, supply and partnership agreements. You must never collude, price-fix, offer personal bribes, request or accept gifts or benefits in kind that generate personal gain on an individual basis in connection with the engagement of suppliers.
9. You are responsible for promptly reporting any action that is potentially inconsistent with the law, common ethical principles, Interactive policies or this Code of Conduct. Concerns should be discussed with your leader or a member of the People and Culture team.

## **5.1 Performance Standards**

We differentiate ourselves from our competitors based on the quality of the services we deliver to our customers, which requires each of us to deliver to the agreed performance standards for our role. We proudly maintain a high-performance culture.

We have the opportunity to continue to grow our business along with our professional skills and you're encouraged to stretch yourself to deliver to the best of your ability. We value people who care. Together we deliver more when we are willing to go the extra mile for the benefit of our customers.

We recognise that technology changes the way in which we work and we offer flexibility accordingly. It is expected that you dedicate the whole of your time during your expected working hours or those hours reasonably necessary for the proper performance of your role.

## **5.2 Bullying, Discrimination, Vilification and Sexual Harassment**

Discrimination, vilification, sexual harassment, bullying and victimization are strictly prohibited at Interactive, and are also unlawful (in line with the laws applicable in your jurisdiction).

We are all responsible for maintaining appropriate standards of behaviour in this regard, and this is covered in more detail in our Anti-Discrimination, Bullying & Harassment Policy.

## **5.3 Conflicts of Interest**

We are all responsible for maintaining the integrity of our workplace by highlighting any Conflicts of Interest. If you have identified a Conflict of Interest, you need to disclose this in line with the disclosure requirements outlined in section 5.3.1 below.

Conflicts of Interest can include any of the following, where you:

- work or render services of any kind for the benefit of any person, firm or company, that conflicts or competes with the business of Interactive.
- accept a directorship, whether executive, working or otherwise, of another company, that conflicts or competes with Interactive.
- enter into any partnership, whether as an active partner or otherwise, that conflicts or competes with Interactive.
- own, conduct, transact or you are engaged in, any business that conflicts with Interactive.
- have a close personal relationship, please refer to the Close Personal Relationships Policy.
- hold material shareholdings (i.e. >5%) of a firm or company that competes with Interactive relating to its core service offerings including Cloud, Cyber and Systems products.

Any personal interest that might affect, or be seen by others to affect, your impartiality in decision-making must be declared immediately. Examples of this include purchasing from suppliers who have a personal relationship with you (e.g. family, friends, etc.). In such instances, the employee in question must not be involved in the procurement process or decision for that purchase.

### **5.3.1 Disclosure Requirements**

To mitigate the risks associated with Conflict of Interests, you are expected to:

- a. as soon as is practical, disclose any existing or new Conflicts of Interest by submitting the Conflict of Interest Declaration (included at the end of this policy) to your leader, ELT member or to a People & Culture representative.
- b. take all reasonable steps to avoid or mitigate any actual, potential or perceived Conflict of Interest that may arise.

The leader who receives the Conflicts of Interest Declaration is responsible for providing the disclosure to the Chief People Officer, so that appropriate conflicts or other relevant matters may be considered.

### **5.3.2 Managing Conflict and Risks**

It's necessary for Interactive to know about and manage Conflicts of Interest in the workplace because they have the potential to have a negative impact on Interactive, for example, they may:

- Increase the risk of unintentional or intentional bias in decision making
- result in unethical behaviours such as fraud or illegal practices
- erode customer trust and damage Interactive's reputation and image
- reduce productivity at work

Where Interactive forms the view that a conflict does or could exist, we may:

- direct you to take action(s) to resolve that conflict, and you agree to comply with any instructions to this effect.
- Where the Conflict of Interest relates to purchasing from suppliers who have a personal relationship with you (e.g. family, friends, etc.), you must not be involved in the procurement process or decision for that purchase.
- terminate your employment in accordance with your employment agreement, without notice or payment in lieu.

## **5.4 Fraud, Bribery and Corruption**

Interactive has zero tolerance when it comes to fraud, bribery and corruption. It is expected that you act with integrity and trust.

### **5.4.1 Ethical Selling or Procurement**

In the course of your employment, you may be involved in the selling or procurement of goods or services. Our expectations are that you demonstrate responsible behaviour and strive for transparent and commercial decisions.

You must always act in line with Australian Consumer Laws, including but not limited to not colluding with our competitors or being involved in any anti-competitive behaviour (for example, price fixing). You must never offer personal bribes as part of selling our goods or services.

You must never request or accept gifts, hospitality or benefits in kind that generate personal gain on an individual basis in connection with the engagement of suppliers. Any gift or benefit, either for yourself or for another person, must be declared immediately to your leader.

Any Conflict of Interest as outlined in section 5.3 above must be declared immediately to your leader in line with the disclosure requirements in section 5.3.1 above.

All purchases on behalf of Interactive (including expense claims, corporate credit card expenditure, purchase orders etc.) must be in line with company policy.

## **5.5 Attendance**

You are expected to maintain work hours appropriate to your role. If you are going to be late or absent for any reason, please contact your leader as soon as reasonably practical as per the Leave Policy.

All absences from work, including personal and annual leave should be recorded in accordance with our policies and procedures.

## 5.6 Personal Presentation

For standards of dress and presentation we trust you to exercise good judgement in ensuring that you are dressed appropriately for the occasion and in line with the requirements of your role. Remember, customers visit our sites regularly.

We recognise the diversity of cultures, religions and disabilities of our team and are respectful when this affects dress requirements.

For further clarity, particularly in relation to what is appropriate to your role, please speak with your leader.

## 5.7 Drugs and Alcohol

We take our duty to provide a safe and healthy work environment seriously. This includes taking reasonable precautions to ensure that all individuals are "fit to work" to minimise risks to both themselves and others. You have a duty to present for work (and remain while at work) in a fit state to work.

For the purpose of this clause, the workplace includes on-site at Interactive premises, as well as off-site and customer locations, including on-call, when working from home and driving to and from all work-related venues.

Where Interactive, on reasonable grounds, has concerns about an individual's capacity for work, the individual may be required to complete drug and alcohol testing, conducted by Interactive or a customer/partner if working at their site.

Any individual covered by this policy who declines to participate in the test or returns a positive result may:

- be directed to remain away from the workplace until their fitness for duty is confirmed; and/or
- be subject to disciplinary action, up to and including termination of employment.

### 5.7.1 Alcohol

Employees are not permitted to do any of the following, which may constitute serious misconduct:

- a. Work while under the influence of alcohol.
- b. Commence or return to work while under the influence of alcohol.

The consumption of alcohol may be permitted in certain circumstances such as for special functions, e.g. Christmas parties or client functions. The following expectations will apply to all work-related functions:

- a. Alcohol must be consumed in a responsible manner.
- b. Employees must uphold an appropriate standard of behaviour at all times. Inebriation will not be accepted as an excuse for misconduct.
- c. If an employee consumes alcohol at a company function, they must do so responsibly and ensure that they do not drive if they are over the legal blood alcohol limit.

### 5.7.2 Drugs

Employees are not permitted to do the following, which may constitute serious misconduct;

- Work while under the influence of illegal drugs.
- Commence or return to work while under the influence of illegal drugs.
- Bring illegal drugs to work.
- Sell or dispense drugs at work.



- Possess illegal drugs at work.

Interactive recognises that some people are required to take medication as prescribed by their doctor or health professional. It is expected that you do not participate in work if the prescribed medication impairs your judgement in any way, or impacts your ability to work, drive or perform your duties. You are expected to speak with your leader if you have any concerns in this regard.

Interactive does not accept liability for the consequences (property damage, injury etc.) of any illegal or inappropriate actions of any team member whilst they are affected by drugs and/or alcohol.

## **5.8 Confidentiality of Client and Interactive Information**

All members of the Interactive team play a part in ensuring that our information and that of our customers is always protected. Both during and continuing after the completion of your employment or service agreement with Interactive, you are required to keep confidential information confidential, maintain proper and secure custody of it, and not reproduce it in any form except as authorized by Interactive or as required by law. All confidential information is, and remains, the property of Interactive. All company information and property must be dealt with in compliance with the policies that are published on the intranet.

Please be aware that the services provided to some customers are sensitive and such services may therefore be confidential. Prior to referring to customers as reference sites or discussing them at all externally, please speak with your leader to confirm any sensitivities, or contact the marketing team for approved white papers.

Nothing in this policy limits any obligation applicable to you arising from your contract of employment or contract for services.

## **5.9 Restraint**

Each of us has a responsibility to Interactive and our customers, both during and continuing beyond the completion of an employment or service contract.

Refer to the restraint clause in your employment contract for more information.

## **6 Consequences of breach**

Interactive encourages the reporting of suspected or actual actions that aren't in line with our expectations. Individuals are encouraged to do this via their leader, ELT member, a member of the People and Culture team or via Interactive's confidential and independently monitored Whistleblower hotline (see Whistleblower Policy).

Breaches of this policy will be addressed in accordance with the Workplace Grievance, Disciplinary Procedure and Performance Management Policy.

**Appendix 1 – Conflicts of Interest Declaration Form**

*Please note if this declaration relates to a close personal relationship, please stop here and refer to the Close Personal Relationships Policy.*

**Conflicts of Interest Declaration**

In accordance with Interactive’s Code of Conduct, I disclose that I have a Conflict of Interest relating to *[please tick all relevant boxes below]*:

- I am engaged in work or rendering services that conflicts or competes with the business of Interactive
- Directorships:
  - I am a director or have accepted a directorship of another company, that conflicts or competes with Interactive
  - I am about to accept a directorship of another company, that conflicts or competes with Interactive
- I currently own, conduct, transact or am engaged in a business or partnership that conflicts with Interactive.
- I currently have a material shareholding (i.e. >5%) in a firm or company that competes with the Interactive relating to its core service offerings including Systems, Cloud and Cyber products.
- I have a personal interest that might affect, or be seen by others to affect, my impartiality in decision-making
- Other, please specify:

For the Conflicts of Interests disclosed above, please provide some details:

Please complete the following:

Name:	
Role title:	
Signature:	
Date:	
Business unit:	
Leader:	

**\*\* Please submit your completed form to your leader, ELT member or your P&C Business Partner\*\***