



# ASHLEY SERVICES GROUP

TRAINING | RECRUITMENT | LABOUR HIRE

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## **Code of Conduct – Directors, Senior Executives and Employees**

**Ashley Services Group Limited**  
ACN 094 747 510



## Code of Conduct – Directors, Senior Executives and Employees

This Code of Conduct sets ethical standards for the Directors, Senior Executives and Employees of the Company so as to ensure that their duties and responsibilities to the Ashley Services Group Limited (**Company**) and its subsidiaries (collectively the **ASG Group**) are performed with the utmost integrity and in keeping with the ASG Group's values.

The conduct of the Directors, Senior Executives and Employees (collectively **ASG Personnel**) is governed by the following principles.

### 1 Integrity and Professionalism

- 1.1 ASG Personnel will act honestly and with integrity in all of their dealings for the ASG Group.
- 1.2 ASG Personnel will maintain the highest levels of professional conduct in their interactions with colleagues, business partners and in representing the ASG Group in the community.
- 1.3 ASG Personnel will not discriminate on the grounds of people's race, religion, gender, marital status or disability.
- 1.4 ASG Personnel will be truthful, and not mislead or make any false statements, nor mislead by omission. ASG Personnel will not make promises or commitments that the ASG Group does not intend, or would be unable, to honour.

### 2 Compliance with the law

- 2.1 ASG Personnel will abide by the law at all times.
- 2.2 ASG Personnel are bound by the laws of the state and country in which they operate.

### 3 Conflicts of interest

- 3.1 ASG Personnel will fully disclose any business interest (public or private) and any other matters which may lead to potential or actual conflicts of interest, including any potential related party transactions in accordance with such policies adopted by the Company or the ASG Group from time to time.
- 3.2 ASG Personnel owe their first duty to the ASG Group. In circumstances where other roles (whether serving as directors or trustees of another organisation) potentially conflict with the Company's interests, ASG Personnel will advise and first seek approval from the Company in accordance with this Code and the Company's Constitution.
- 3.3 ASG Personnel will not use their role within the ASG Group for political interests at any time, or for community interests unless authorised by the Company.

### 4 Confidential information

- 4.1 ASG Personnel must ensure that confidential information relating to the ASG Group, its customers, its operations, or any other commercially sensitive matter, are not given either inadvertently or deliberately to third parties without the consent of the board of directors of the Company (**Board**). Other than in circumstances required by law, there is no reason for ASG Personnel to reveal confidential information. Confidential information which is to be released to legitimately interested third parties shall only be made so available after appropriate authorisation procedures have been followed.
- 4.2 ASG Personnel will maintain and observe their obligations of confidentiality and proper use of information even after leaving the ASG Group's employment.



## **5 Bullying and Harassment**

ASG Personnel will treat fellow staff members with respect and will not engage in bullying, harassment or discrimination.

## **6 Inside information**

6.1 ASG Personnel must not use inside information for personal gain.

6.2 If ASG Personnel have inside information (being price sensitive information, information not in the public domain or information about any entity related to an ASG Group company or a strategic partner of an ASG Group company which has come to the knowledge of the ASG Personnel through their employment by or involvement with the ASG Group), the ASG Personnel must not deal in that entity's securities or pass that information on to another person or encourage another person to deal in that entity's securities (securities includes shares, units or any form of derivatives such as warrants or options).

6.3 ASG Personnel will comply with the Company's Securities Dealing Policy.

## **7 Benefits to Senior Executives**

7.1 ASG Personnel must not use their position with the ASG Group to seek personal gain from those doing business or seeking to do business with the ASG Group.

7.2 ASG Personnel must not accept payments, gifts or entertain in a way which is inconsistent with the 'fair trading and dealing' provisions set out in the Code of Conduct – Company's obligations to Stakeholders. ASG Personnel must report the offering of any such benefit to the CEO.

## **8 Fair dealing**

8.1 The ASG Group is committed to fair competition and trading in all markets in which it operates, including dealing fairly with customers and suppliers.

8.2 ASG Personnel will take into account the impact of environmental, health and safety, and competition issues when making business decisions. ASG Personnel will ensure that these business decisions do not compromise the ASG Group's commitment to avoiding injury to people, damage to the environment or the maintenance of competitive markets and will ensure that the ASG Group complies at all times with all relevant laws.

## **9 Corporate Opportunities**

9.1 ASG Personnel are prohibited from taking for themselves personally or directing to a third party any opportunity that is discovered through the use of corporate property, information, or position, without the consent of the Board.

## **10 Protection and Proper Use of Company Assets**

10.1 ASG Personnel must endeavour to protect the ASG Group's assets and ensure their efficient use. Any suspected incident of fraud or theft must be immediately reported for investigation. The assets of the ASG Group should be used for legitimate business purposes and should not be used for non-company business.

10.2 The obligation to protect the ASG Group's assets includes its proprietary information. Proprietary information includes intellectual property, such as trade secrets, patents, trademarks, and copyrights, as well as business, marketing and service plans, engineering and manufacturing ideas, designs, databases, records, salary information, and any unpublished financial data and reports. Unauthorized use or distribution of this information, including, for example, through social media applications and websites, would violate the ASG Group's policy.

## **11 Observance of the Code of Conduct**

11.1 ASG Personnel must report and record any behaviour that involves non-compliance with this Code. The Board will be made aware of any such acts or behaviour and take any action that



is considered appropriate in the circumstances. ASG Personnel must take care to ensure that the application of this Code is enacted in word and deed.

- 11.2 ASG Personnel must work collaboratively and will apply the principles of this Code to their duties and responsibilities on a daily basis.

## **12 Review of this Code**

The Board will review this Code from time to time to ensure that it is operating efficiently and to determine whether any changes are required to be made. This Code may be amended by resolution of the Board.

Adopted by the Ashley Services Group Limited Board on 28 August 2023.