

CODE OF CONDUCT

Overview

People matter to us; therefore, our universal code of conduct sets out the following ethical principles:

- **Equity and Justice:** Spike, it's contractors and vendors are to be treated fairly and consistently – not discriminated against, abused or exploited.
- **Respect for People:** Spike, it's contractors and vendors are to be treated as individuals and their contributions recognised and valued.
- **Personal & Professional Responsibility:** Spike, it's contractors and vendors will ensure the safety of themselves and others, exhibit courteous behaviour upholding the standards expected, protect the rights of others and respect the diversity of all cultures and peoples.
- **Integrity and Diligence:** Spike, it's contractors and vendors must be honest, professional and conscientious in carrying out their duties and avoid conflicts between their private interests and company responsibilities. This includes exercising care for others in employment related issues and ensuring outside interests do not interfere with official duties or responsibilities.
- **Respect for the Law and System of Company Governance:** Spike, it's contractors and vendors must always observe the laws of the State and Commonwealth and the rules and policies of the company.
- **Simple and Effective:** Spike, it's contractors and vendors must use plain English and clear communication in all their interactions. Providing the key details and information effectively.

Definitions

Spike (Spike Design Australia Pty Ltd, employees or agents)

1. Local Governance and Laws

Employees, contractors and vendors must respect and follow all federal, state and local laws.

2. Ethical Standards

Employees, contractors and vendors should be supportive of our ethical commitments for Human Rights, Fair Working Practices as well as principles of the United Nations Global Compact, the UN Universal Declaration of Human Rights and International Labour Organisation Declaration on Fundamental Principles and Rights at Work.

3. Health and Safety

We require all employees, contractors and vendors to be proactive in their Health and Safety Management by:

- Ensuring all workers are adequately trained for the duties they are required to execute
- Provide an adequate number of supervisors
- Not allow workers to perform work that is unsafe or while they are under the influence of drugs or alcohol
- Have a framework that allows employees to report unsafe practices and adequate consultation procedures for reporting and mitigating safety issues.
- Provide adequate training and resources in regards to local, state and federal legislation
- Protect the public from the health and safety risks of business activities
- Work within the parameters of the Work Health and Safety Act 2011 and all applicable Safe Work laws in the state they operate
- Ensure all workers have completed Spike's safety induction.

4. Environmental Commitment

Together with our clients, vendors and stakeholders we are committed to the efficient, effective and environmentally sustainable running of our workplace and its operations. Whilst there are many factors influencing the development of sustainable signage industry that are outside our control, Spike remains committed to moving towards an efficient and impactful environmental policy and principals.

Employees, contractors and vendors alike must:

- Comply with the requirements in all relevant environmental documents
- Maintain an internal Environmental Policy
- Manage bush fire risk and work in accordance with our Total Fire Ban requirements.
- Prevent pollutants such as oil, fuel, chemicals, or sediments, if applicable in their manufacturing / working process
- Promote environmental principals
- Take responsible steps to reduce, reuse and recycle where possible
- Provide workers access to report events or practices that they are concerned about

- Protect Flora and Fauna in the spaces and places they work

5. Modern Slavery & Human Rights

At Spike, we are committed to improving our knowledge, commitment, and actions to support both the sustainability of business and the planet. Our employees demonstrate our conscientious commitment every day in the way we conduct ourselves in spaces and places we work.

We recognize that the Vendors we engage and products we use must also reflect these values. We want our Vendors to share our commitment to maintaining compliant, responsible and sustainable operations and practices.

What is Modern Slavery

Defined as exploitative practices that violate an individual's dignity and human rights, including human trafficking, servitude, forced labour, debt bondage, and wage theft, all forms of modern slavery are serious crimes under Australian law.

Minimum Standards

This Code establishes minimum standards that we expect customers, subcontractors and Vendors to meet or exceed.

These standards do not intend to deviate from national or local laws or standards. Failure to meet these standards may be cause for termination of any agreement entered into with Spike._

Child Labour

We are opposed to the use of any form of child labour or practices. Our customers, subcontractors and Vendors must not use child labour.

Employees, contractors and vendors are required to comply with applicable child labour laws and employ only workers who meet the applicable minimum legal age requirement in their countries of operation.

This means:

- the minimum working age required by local laws Compliance with the Modern Slavery Act 2018
- All workers under the age of 18 years are not to be involved in any work that is hazardous or likely to have a negative impact on the employee's physical or mental development.
- Employees contractors and vendors are to ensure the above protection for workers under the age of 18

- Employees contractors and vendors must not contract with subcontractors or Vendors who use or engage in child labour

Forced, Involuntary labour & human trafficking

Spike's employees, contractors and vendors must not participate, engage or promote forced, bonded, indentured or involuntary prison labour of people in any part of its business.

Spike's employees, contractors and vendors must not participate, engage or promote the trafficking of any person.

All slavery and human trafficking laws must be complied with. Subcontractors and Vendors must ensure they have taken steps to ensure their business operations are free from slavery and human trafficking practices, both internally and within their supply chains and other external business relationships.

Spike's employees, contractors and vendors are to ensure that all workers employed by them choose their employment freely and are not mentally or physically coerced to provide their labour.

Spike's employees, contractors and vendors must not contract with subcontractors or Vendor using or engaging in modern slavery or trafficking.

Compensation, Contracts and Awards

Spike it's contractors and vendors shall ensure compliance with applicable Award wages and National Employment Standards.

Spike it's contractors and vendors shall ensure all workers are remunerated fairly and compliance is kept for any annualised salary arrangements.

Spike it's contractors and vendors shall ensure their workers and agents have employment contracts outline their remuneration and applicable penalty rates and over time rates.

Spike it's contractors and vendors shall ensure all employees and workers are aware of the Award or enterprise agreement applicable to their role. And, include this with their employment contract and on boarding.

Deductions from wages as a disciplinary measure shall not be allowed, if not legally permitted and even where legally permitted, should be minimised.

Compliance

employees, contractors and vendors shall take all reasonable steps to ensure that modern slavery and human trafficking is not taking place within their supply chain or within any part of their business. Employees, contractors and vendors must adhere to this Code along with all applicable national and local laws.

Employees, contractors and vendors must be able to certify that materials included in their products comply with all requisite slavery and human trafficking laws. Spike may at any time request a supplier or contractor to supply a report setting out the steps they have supplier or contractor a corrective action plan. This plan is to set out the steps that the supplier or contractor will undertake to rectify the breach. Should the corrective action plan not rectify the breach and depending on the severity of the breach, we reserve the right to terminate any contractual relationship that exists.

Resources

*FREE Training: An Introduction to Human Rights and Modern Slavery
https://learn.supplychainschool.org.au/mod/scorm/player.php?a=39¤torg=Modern_Slavery_e-learning_module_A2_ORG&scoid=82

*Where Might Modern Slavery Be Hiding In Your Supply Chain Information:
https://learn.supplychainschool.org.au/local/tlactionplans/resource_intro.php?id=806&modtype=page

The Modern Slavery Toolbox Talk:
https://learn.supplychainschool.org.au/local/tlactionplans/resource_intro.php?id=828&modtype=page

Modern Slavery Act 2018 Legislation:
<https://www.legislation.gov.au/Details/C2018A00153>
*Supplied by Supply Sustainability School

6. Diversity

Spike it's contractors and vendors should maintain and inclusive workplace. No discrimination of race, gender, sexual orientation, age, religious views, disability, veteran status, and origin should be adopted in their workplace.

Spike it's contractors and vendors will comply at all times with the Age Discrimination Act 2004, Australian Human Rights Commission Act 1986, Disability Discrimination Act 1992, Racial Discrimination Act 1975, and the Sex Discrimination Act 1984.

7. Data Privacy and Data Protection

Spike it's contractors and vendors will comply at all times with The Privacy Act 1988 and any applicable local, state or federal legislation.

8. Bribery and Corruption.

Spike it's contractors and vendors will monitor and keep accurate policy documents and reporting frame works for Anti-Corruption and Bribery.

Spike it's contractors and vendors will comply with all international anit-bribery regulations.

Spike it's contractors and vendors shall not (directly or indirectly) engage in bribery or trade off in contract or work negotiation resulting in off book transactions, providing luxury gifts for the promise of work or any improper influence of an official, customer, vendor or employee.

Spike it's contractors and vendors shall hold a policy documents detailing gift giving and gift receiving.

9. Trade Regulations

Spike offers professional, technical and scientific services. We acknowledge our contractors and vendors may be classed in other industries, such as manufacturing and building and construction. At all times, Spike, it's contractors and vendors will comply with the binding regulations of their trade.

Spike's contractors and vendors will ensure adequate training and information is provided to their employees and workers about any trade regulations they are required to follow.

10. Fair Financial Terms of Trade

Spike, it's employees, contractors and vendors will ensure compliance with any and all payment regulations, including but not exclusive to the Building and Constructions Securities of Payments Act.

Spike will ensure it has adequate and fair terms with it's contractors and suppliers and will not enter into arrangements for Small Medium Enterprises (SME's as defined with a turnover less than \$100 million) with trading terms over 30 days from the end of the of approved works on site or works installed. Spike expects and requires it's contractors and vendors to ensure their payment terms with SME's do not exceed the above standard.

Spike, it's contractors and vendors will comply with the requirements of Subcontractor Statements or Declarations in regards to payment of wages, and contractors.

Spike it's contractors and vendors will at all times comply with the Workers Compensation Act 1987, The Payroll Tax Act 2007 and The Industrial Relations Act 1996.

12. Money Laundering and Financial Records

Spike, it's contractors and vendors will at all times maintain relevant insurances and Certificates of Currency for Public Liability (no less than \$20 million) as well as Workers Compensation, Contractual Works, Professional Indemnity and Business Premises and Product Insurances if applicable.

Spike may request copies of relevant certificates of currency at any time. Contractors and vendors must provide Spike with up to date insurances in these events.

All insurances must not include any exclusion of liability clauses and cover Spike for it's interest in the coverage. Contractors and vendors must name Spike (and if requested their clients) as interested parties on the Certificate of Currency.

13. Money Laundering and Financial Records

Spike, it's contractors and vendors will at all times comply with applicable laws and regulations. Spike, it's contractors and vendors shall engage in genuine participation with the Australian Tax Systems, maintain truthful, accurate financial records and reports according to local and international laws and regulations.

14. Fair Competition

Spike, it's contractors and vendors must at all times comply with applicable competition and anti-trust laws.

15. Conflict of Interest

A conflict of interest arises when an individual has a private/personal interest which could appear to influence their decisions. Examples of a conflict of interest may include include a relationship by marriage or blood, business relationship, business partnership or investment. Spike's contractors and vendors must disclose any actual or potential conflict of interest with Spike.

17. Communication

Spike it's contractors and vendors must communicate with respect at all times. Swearing, abuse and threats will not be tolerated.

18. Extension of This Code and Polices

Contractors and vendors shall encourage its own contractors and vendors to adhere to this Code of Conduct as part of fulfilling their purchase obligations.

Spike's employees, contractors and vendors must all times comply with all of Spike's policies, including:

- Human Resources Policy
- WHS Policy
- Environmental Policy
- Human Rights Policy
- Anti-Corruption and Bribery Policy
- Harassment, Bullying and Vilification Policy
- Recruitment Policy
- Whistle blower Policy
- Any other policy or procedure document provided to the Employee, contractor/vendor during the course of business. As well as Spike's terms and Conditions.

19. Reporting Breaches of This Code of Conduct, Unsafe or Unethical Practices and Reportable Events.

Spike it's employees, contractors and vendors will report any breaches using our Reportable Event Form using the below link or to a representative of Spike.

Spike Reportable Event Notification Form:
<https://forms.office.com/r/14NJDuaQE3>

By accepting work, being employed or engaged by Spike In any capacity, employees, vendors and contractors self-declare and confirm their compliance and acceptance of this Code of Conduct.