



PATH4 GROUP

CODE OF ETHICS AND BUSINESS CONDUCT

PATH4 is committed to treating all workers with respect and dignity, ensuring safe working conditions, and conducting environmentally responsible, ethical operations. We expect host employers, clients and suppliers in our operations and supply chain to embrace the following social, environmental, and ethical responsibilities.

SCOPE:

Our Code of Business Ethics applies to all people and organisations that we have a relationship with including our management team, internal and on-hired employees, on-hired graduates as well as host employers, suppliers, individual and corporate clients.

PURPOSE:

The purpose of documenting this Code of Ethics is to provide clarity on our position across many diverse issues and topics. We have every confidence in the PATH4 management team and all employees and this document does not in any way negate or indicate a questioning of that trust and respect. It is simply a reference point and a guide for existing employees and suppliers as well as those who will join us in the future

VALUES:

Our Code of Business Ethics is based on the following common principles:

1. **Respect for others.** Treat people as you want to be treated
2. **Foster Constructive Dialogue.** Provide an environment where employees and suppliers can freely voice concerns
3. **Labour and Human Rights.** Uphold legislative and the basic human right to be paid for a job completed
4. **Providing a safe working environment.** Ensure that all workers can enjoy a safe working environment
5. **Lawfulness.** Make sure your decisions and objectives are fair and don't disadvantage or adversely impact on others and understand the law where it pertains to your work and more broadly your life actions and always follow it
6. **Accountability.** Be responsible for your work and your actions
7. **Consider the bigger picture and respect our environment.** We have one world.



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The following expands on our values and provides a more detailed explanation of the components of our Code.

RESPECT FOR OTHERS:

Interactions between employees, management team, on-hired employers, host employers and suppliers should be respectful and all behaviours must align with company values and policies.

Our business has a strong and exemplary history in relation to the treatment of others and we believe an effective workplace can only exist when all stakeholders are fully committed to treating one another with respect. In addition, as an EEO employer we are dedicated to providing an environment that is without discrimination or offensive or harassing behaviour.

Any employee or supplier who experiences any form of harassment or discrimination should report the matter immediately to their manager or to the PATH4 Managing Director

Reference: EEO Harassment Policy

Reference: PATH4 Whistleblower Protection Policy

FOSTER CONSTRUCTIVE DIALOGUE:

We believe that effective communication is directly aligned with respect for others. We believe that any employee, host employer or supplier should feel free to voice all concerns about work related matters without fear of retribution.

PATH4 takes its Whistleblower Protection Policy and corresponding procedure very seriously and undertakes without reservation to investigate any reported matter in a timely manner and take appropriate action where there is a valid finding of wrongful conduct. All management, employees, host employers and suppliers should be aware that intimidation, attempted intimidation or retaliation against a co-worker or employee who has reported alleged wrongdoing is unacceptable and will be dealt with accordingly.

LABOUR AND HUMAN RIGHTS:

PATH4 believes that gainful employment (including the recruitment process, on-boarding and career progression) is an essential human right.

PATH4 operates under Australian Industrial Relations legislation and in addition is committed to upholding the human rights of workers and treating them with dignity and respect. This applies to all workers, including temporary, migrant, student, contract, direct employee, and any other type of worker. In addition, it is expected that host employers and suppliers will manage their own workforce similarly.

PATH4 adheres to promoting:

- **Freely Chosen Employment and Combatting Modern Slavery.** To not use or permit any form of forced, bonded, or indentured labour. All work must be voluntary, and all workers must be free to terminate their employment at any time. Employees or workers of host employers or suppliers will not pay recruitment fees or other fees for their employment, either directly or through third parties. As part of the hiring process, all employees (of PATH4, host employers and suppliers) will be provided a written agreement describing the terms of employment in a language understood by the worker.
- **Young Workers and Student Interns.** PATH4, host employers and all suppliers will adhere to Australian legislation as it relates to minors. Wages and other statutory payments will be made to minors in line with Fair Work Legislation and in addition minors should not be required to perform work that is likely to jeopardize their health or safety, including night shifts and overtime. Suppliers may use legitimate, properly-managed apprenticeship programs, such as student internships.
- **Wages.** All internal employees, on-hired employees and those employed by our host employers and suppliers will be paid legally-mandated wages and benefits, will be protected by legislation as it relates to wage deductions and will be provided with appropriate pay slips detailing all rates or pay and superannuation payable
- **Working Hours.** Workers will only be expected to work within the design of the relevant Award or classification for their role
- **Fair Treatment, Non-Discrimination, Diversity and Inclusion.** PATH4, host employers and its suppliers will not permit harassment, abuse, corporal punishment, or inhumane treatment. Host employers and suppliers will not subject workers or potential workers to unlawful medical tests or physical exams. Discrimination in screening, hiring, or employment practices based on race, colour, age, sex, gender, gender identity, gender expression, sexual orientation, marital status, ethnicity, national origin, caste, disability, genetic information, medical condition, pregnancy, religion, political affiliation or union membership will not be tolerated to any extent. Workers' religious practices will be respected and reasonably accommodated.



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PROVIDING A SAFE WORKING ENVIRONMENT:

PATH4, host employers and suppliers will integrate the following health and safety management requirements into business processes to provide workers with a healthy and safe working environment:

- Occupational Safety and Health. All related entities will comply with all applicable safety and health laws and regulations, and identify, evaluate, and control worker exposure to safety and health hazards, including chemical, biological, physical, and ergonomic stressors, through proper design, engineering controls, maintenance, safe work procedures, and ongoing health and safety guidance. Where these means cannot adequately control hazards, suppliers will protect workers with appropriate personal protective equipment and provide them with information about risks to them from these hazards.
- Procedures to prevent, manage, track, and report occupational injury and illness, including encouraging worker reporting, classifying and recording cases, providing medical treatment, investigating cases, implementing corrective actions, and facilitating workers' return to work will be documented and KPIs regularly reported.

LAWFULNESS:

Compliance with all applicable (local, state and federal) laws is a fundamental aspect of our commitment to integrity. An individual understanding of relevant company policies, rules and regulations is also required and any employee or external stakeholder in doubt about whether potential action complies with applicable law or Company policy should not take any action without consent of management.

We uphold the principle of **competition** as it exists in a free market economy and guarantee that our services will only be provided based on factors deemed fair and reasonable within those market conditions. In addition, this means that we will not engage in any collusion, conspiracy or any other inappropriate or illicit practices.

We will not obtain or try to obtain any competitor's **Proprietary Information**, nor will we condone or participate in improper use, copying, distribution or alteration of software or other intellectual property.

PATH4, employees, host employers and suppliers must avoid any potential **Conflict of Interest**. All relationships or activities that actually compromise or could potentially compromise an employee's objectivity must be avoided. In addition, **accepting Professional Courtesies** should only be accepted if the manager or employee is confident that in doing so their objectivity will not be compromised.



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ACCOUNTABILITY:

It is the responsibility of each employee to understand this Code and if they are unsure on any of its content or other Company policies they must seek advice and clarification from their manager. Violation of the PATH4 values and principles through ignorance will not be considered a valid excuse for avoidance of disciplinary action.

Company assets including equipment and information are provided for professional use. Occasional personal use, provided it is not disruptive and does not adversely impact on job performance is acceptable however the use of such equipment for outside commercial purposes or in support of any religious, political or other similar activity is not permitted. Similarly, distribution of information not relevant to PATH4 or the host employer by an employee in work areas or during work hours is not permitted.

To protect the interests of PATH4 and its employees, we reserve the right to monitor or review all data and information contained on company soft ware accounts or company issued computers or devices.

ENVIRONMENTAL

PATH4 recognizes that everyone, both organisations and individuals, must take some responsibility for the longevity of their immediate as well as the greater environment. Environmental responsibility is complex as it seeks to find a balance between human needs while remaining responsible for physical, natural and cultural systems.

Where possible, PATH4, host employers, employees and suppliers should act to:

- Minimise and consider any significant adverse environmental impacts from business activities and personal behaviours
- Ensure that all environmental permits, approvals and registrations are obtained and kept current and that operational and reporting requirements are fulfilled (where applicable)
- Ensure that consumption of resources, including raw materials, energy and water are reduced wherever possible, even by small incremental amounts if that is the limit of the individual or organisational influence. All organisations and individuals should seek to minimise energy consumption and greenhouse gas emissions and look to find ways to improve energy efficiency and use cleaner sources of energy
- Where applicable, suppliers should identify and manage chemicals and other materials that pose a hazard to the environment, to ensure their safe handling, use, storage, and disposal including labelling for recycling or disposal.