

Code of Conduct

January 2019



INTRODUCTION

This “Code of Conduct” applies to all employees of Orthopaedic Appliances Pty Ltd (“OAPL”). if you do not understand your responsibilities and OAPL’s obligations you should seek guidance from your manager, Chief Financial Officer or Chief Executive Officer.

As a company we conduct business according to the highest standards of honesty, integrity, respect and fairness when dealing with all of our customers and suppliers.

We require that all of our employees meet these high standards.

The company takes seriously its’ obligations to comply with all Federal, State and Local Government Laws and Regulations, as well as common law obligations and again requires all employees to do the same.

The Code is not intended to be all encompassing but rather the Code outlines the obligations and standards of behavior that are expected of all OAPL employees.

GENERAL PRINCIPLES

- Treat all employees and customer/suppliers with courtesy and respect.
- Provide the highest standard of quality in the provision of any service.
- Do not behave in a harassing manner towards other employees, customer or suppliers.
- Always maintain high ethical standards when carrying out your duties and customer service.
- Be honest, fair and non-discriminatory in your dealings with other employees, customers and suppliers.
- Do not perpetrate, permit or fail to report violations of any Federal, State or Local Government Act or regulation.
- Be accountable for your own conduct and behavior.
- Do not behave in a manner which may bring OAPL into disrepute.
- You have a responsibility to declare any actual or potential conflict of interest between your role as an employee of the Company and your involvement in an outside activity.
- You must not solicit any bribe, gift or benefit in relation to the performance of your duties.
- You must not misappropriate Company funds or property of Funds or property of customers and / or suppliers.
- It is your responsibility to ensure you use company information, resources and work time for business purposes and not for private gain.
- Report any corrupt conduct or fraudulent behavior, involving or affecting OAPL, of which you are aware, or which you suspect.
- Maintain the standards, practices and guidelines as outlined in the OAPL Quality Management System.
- Be aware of Company Policies and Procedures as set out in the employee Handbook, OHS Manual, Intranet site and ensure that you comply with them.
- You must not use drugs or alcohol on the premises (excludes prescribed drugs or authorized social events) or enter a work site / use a company vehicle affected by either.
- You are expected to use Company communication devices for business purposes. Personal use must be kept to a reasonable level.
 - You must not use the Internet to access sexually explicit material.
 - You must not use email to send sexually explicit, suggestive, or other harassing material.
- Ensure that you maintain the integrity and securing of all confidential corporate information, whether it be written, verbal or computerised.
- Always put **SAFETY** first and do your utmost to comply with Occupational Health and Safety requirements and environmental laws and standards

RESPONSIBILITIES

Code of Conduct for Managers

In addition to complying with all of the above, Managers also have the responsibility to execute their managerial and supervisory duties with fairness. As a Manager or Supervisor, you should also ensure that you:

- Do not condone, permit or fail to report any breaches of the above code by employees under your supervision.
- Fully inform your staff of their duties and the expectations on how those duties are to be performed.
- Are accountable for the conduct of your own staff.
- Promote a team spirit amongst employees through your own behavior.
- Maintain confidentiality when conducting investigations into employee grievances.
- Avoid bias in decision making.
- Ensure compliance with Company procedures when counseling and disciplining employees.
- Disqualify yourself from decision making where you are unable to remain objective.
- Exercise objectivity when administering rewards or discipline.

The following are acts which the company considers unacceptable. Any employee found engaging in these acts will be subject to disciplinary action which may include a verbal warning, written warning, suspension or dismissal:

- being absent from work without a valid reason
- willfully damaging, destroying or stealing property belonging to fellow employees or the company
- refusing to follow or failing to carry out the reasonable instructions of a supervisor / manager
- intentionally giving any false or misleading information to obtain a leave of absence or a personal gain
- using threatening or abusive language towards a fellow employee
- smoking contrary to established policy or violating and fire protection regulation
- willfully or habitually violating health and safety regulations
- failing to wear clothing conforming to standards set by the company including PPE
- being constantly late or taking unexcused absences from work
- not taking proper care of, neglecting or abusing company equipment or tools
- using company equipment in an unauthorized manner

CODE OF CONDUCT

Compliance with the law

OAPL undertakes to comply with all applicable laws at all times. In interpreting the law, OAPL and its employees will always endeavor to adopt a course which reflects both the letter and the spirit of the law and reinforces our reputation for integrity. Any breaches of the law are considered serious misconduct and will result in instant dismissal.

Conflicts of interest

OAPL expects its employees not to place themselves in a position where their private interests conflict directly or indirectly with their obligations to OAPL. Any conflict of interest or potential conflict of interest should be reported immediately to the employee's supervisor or manager.

Gifts and entertainment

Employees must not solicit or accept any benefits (such as cash, gifts and entertainment) from any person in connection with, or as a reward for, any service or business of OAPL if these benefits could be interpreted or perceived as creating an obligation, affecting employees' impartiality or influencing an employees' business decision. Reasonable offers of entertainment such as dinners, theatre or sporting events may be accepted or offered in the normal course of business.

Customers and business relationships

All dealings with customers, suppliers, shareholders and other stakeholders will be conducted in a professional and courteous manner. Business decisions with customers and suppliers must be made solely on sound commercial grounds having regard to quality, price and service and must be made independently of our competitors.

Employees are expected to conduct business having regards to all applicable laws and regulations, including competition laws and laws prohibiting bribery and corrupt practices both locally and overseas.

National Disability Insurance Scheme (NDIS)

OAPL is an active participant in providing supports or services to people with disability and you are expected to adhere to the following code:

- act with respect for individual rights to freedom of expression, self-determination and decision-making in accordance with laws and conventions
- respect the privacy of people with disability
- provide supports and services in a safe and competent manner, with care and skill
- act with integrity, honesty and transparency
- promptly take steps to raise and act on concerns about matters that may impact the quality and safety of supports and services provided to people with disability
- take all reasonable steps to prevent and respond to all forms of violence against, and exploitation, neglect and abuse of, people with disability

Employees and their working environment

All employees will be given every reasonable opportunity to develop fully their abilities to advance within OAPL. OAPL's objective is to ensure that all employees enjoy equal employment opportunity

without discrimination, harassment or bullying on the basis of gender, race, colour, national origin, religion, age, disability or any other characteristic protected by law.

Harassment (including sexual harassment such as unwelcome sexual advances, requests for sexual favours or any other verbal or physical conduct of a sexual nature) or bullying of any kind will not be tolerated.

The use of any medium (including email or the Internet) to disseminate material which is sexually explicit, defamatory, racist or vulgar is prohibited. Willful disregard of this policy will result in the appropriate disciplinary action being taken, which may include instant dismissal.

Confidentiality

During the course of employment with OAPL, employees may learn confidential and / or personal information about OAPL, its employees, suppliers, customers and competitors. This information must not be disclosed while you are an employee of OAPL or even after you have left OAPL.

Use of Company Assets

OAPL's assets (such as funds, stock and equipment) are only to be used by employees for business purposes or business interests. Assets are not to be used or removed from company premises without proper authorization and compliance with relevant procedures.

Safe and healthy working environment

At OAPL, we value the health and safety of our people and everyone who visits our work sites and consider this vital to the success of our business. For this reason, OAPL is committed to achieving its company goal – **ZERO HARM**. This goal will only be achieved through the application of sound risk management principles in line with our various business risks and the continuous improvement of our occupational health and safety policies and procedures, in consultation with our employees and other stakeholders as well as active participation and support from all levels of management and our employees and contractors.

The workplace must be kept safe and free from violence or unsafe work practices.

Employees are required to comply with the OAPL Zero Harm policy and to report any hazardous conditions in the workplace and any workplace incidents, accidents or near misses. Employees must not while at work improperly use medication or be under the influence of alcohol or drugs. Safety is good business and there is no good business without safety.

OAPL is committed to minimizing the impact of its operations on the environment. Where possible, we recycle, minimize energy consumption and minimize our water usage.

Political Contributions

While employees are entitled to personal views and activities, OAPL is politically neutral. No OAPL company or employee should take part in a political event as a representative of OAPL or allow a political event to take place on company property without the express permission of the Managing Director. No company payments, donations or gifts of value may be made to a political party, candidate or other associated third parties, including industry groups and trade unions, without the prior approval of the Board.

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Compliance with the code

All employees of OAPL have a responsibility to adhere to this Code of Conduct and ensure that no breaches occur.

Breaches of the Code

Employees are required to report to their manager or supervisor any known or suspected work-related event which involves questionable, dishonest or fraudulent activity. Any employee who reports in good faith a breach or suspected breach of the Code will not be disadvantaged or prejudiced.

All suspected breaches of the Code of Conduct will be investigated. Persons in breach of the Code will be subject to appropriate disciplinary action, which may include dismissal. Any conduct that may constitute a criminal offence will be reported to the police.

Review of policy

This policy is approved by the OAPL Board and will be reviewed on a regular basis to ensure that it is in accordance with the appropriate practices prevailing at the time.

Questions

If you have any questions regarding this Code of Conduct or doubts as to how you should respond to a particular circumstance, you should discuss the matter further with your immediate supervisor, manager, or otherwise contact either the Financial Controller or Managing Director. You should also ensure that you make yourself familiar with all other OAPL policies. These policies can be found on the OAPL intranet site.