

ViCSPA Code of Conduct

| Expectation | Statements of action | Minimum standards of behaviour |
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| <p>Our Code of Conduct is a set of Guiding Principles which we apply by asking ourselves "What is the right thing to do?"</p> | <p>We treat each other with respect and dignity</p> | <ul style="list-style-type: none"> • We maintain a safe and fair work environment • Everyone is entitled to be treated with respect as a person, regardless of role or individual differences • We value our people and their personal commitment to delivering quality products and services • We encourage cooperation, learning and growth in all who work with us. • We strive to understand and respond to the needs of customers and other stakeholders |
| | <p>We respect the law and act accordingly</p> | <ul style="list-style-type: none"> • We respect the laws, customs and business practices of the countries and states in which we operate, but do not compromise the principles embodied in this Code • We notify our supervisor immediately of any breach of the law • In interpreting the law, we adopt a course which preserves integrity |
| | <p>We are fair and honest in our dealings</p> | <ul style="list-style-type: none"> • We are fair and honest even when we believe others would not know of our actions • Honesty for us means not using coercive or misleading practices or falsifying or wrongfully withholding information • We do not place ourselves in situations in which our private interests could conflict directly or indirectly with our obligations to ViCSPA • We do not accept benefits such as gifts or entertainment when the situation could be seen as creating an obligation • We do not act in ways which may cause others to question our loyalty to ViCSPA |
| | <p>We use ViCSPA's property responsibly and in the best interests of ViCSPA and its reputation</p> | <ul style="list-style-type: none"> • We do not use ViCSPA funds to provide unreasonable benefits such as gifts or entertainment for ourselves or others • We use ViCSPA's property such as equipment or stores only for the company's business purposes • We do not disclose confidential information without proper authorisation |
| | <p>We are responsible for our actions and accountable for their consequence</p> | <ul style="list-style-type: none"> • We take personal responsibility for all issues over which we have control and the manner in which these are achieved |

Purpose

This Code of Conduct (the Code) sets out some of the important values, practices and principles that are reflected in the way ViCSPA conducts its business. The Code specifies the standards of behaviour required of employees in the performance of their duties. The Code addresses ViCSPA's commitment to the honesty, integrity and ethical behaviour of ViCSPA directors, officers and employees in the way we manage our business affairs internally and with external stakeholders.

Responsibilities and Compliance with the Code

The obligation to adhere to this Code is a condition of service as a member ViCSPA, whether as a director, officer or employee. All employees of ViCSPA are required:

- To comply with all lawful directions of ViCSPA;
- To promote the interests of ViCSPA;
- To act in accordance with ViCSPA's approved policies and procedures (as amended from time to time). Any changes will be communicated to all employees.
- To the best of their knowledge and ability, adhere to and advocate the principles and responsibilities governing their professional conduct. Employees need to understand that the Code also applies to and embraces adherence of the formal policies and procedures of ViCSPA in the conduct of their roles.

Every new hire will be given a copy of ViCSPA Code of Conduct at their induction. Where there is doubt as to the application of the Code, or the appropriate course of action to be adopted, employees' affected should discuss the matter with their Manager/Supervisor.

Where there is failure by an employee to adhere to this Code this will result in disciplinary action as deemed appropriate by supervisory personnel or by ViCSPA's Board of Directors, which may include termination of employment.

Reporting of Misconduct

- If employees have evidence of an actual or potential violation of this Code, they should report such evidence to a Manager/Supervisor.
- ViCSPA provides protection to persons who, if in good faith, report violations or potential violations of this Code. All reports of violations or potential violations shall be investigated.

Acknowledgement

I acknowledge the ViCSPA Code of Conduct and will adhere to this Code during my employment with ViCSPA.

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| Signed | |
| Printed Name | |
| Date | |