

Policy Title	Department	Policy Number	Version
Code of Conduct	Corporate	PAC03	1.0

Purpose:

PAC Trading expects its directors, officers, employees, and contractors to meet high standards of performance and behaviour in all their dealings with colleagues, customers, contractors and visitors to its premises. PAC Trading is committed to not only complying with its legal obligations, but also acting ethically and responsibly in relation to all interactions with its customers and the community.

1. Scope:

This Code of Conduct sets out the standard of conduct required to be met by all directors, officers employees and contractors of PAC Trading. It applies to you whenever you are acting as a representative of PAC Trading. This may include occasions when you are outside your normal workplace or working hours, such as work functions, out of hours work activities, or when you are traveling or elsewhere in the community representing PAC Trading.

This Code of Conduct exists for the benefit of PAC Trading and does not form part of any contract of employment; however, it is a condition of employment that employees comply with it.

The Code of Conduct cannot be drafted to give guidance for all potential situations, and therefore common sense, honesty, integrity, and fairness should be applied in all circumstances.

2. Conduct requirements:

As an employee or contractor of PAC Trading, you are expected to adhere to and uphold the following conduct requirements in the performance of your duties or services:

- (a) Act lawfully, ethically and with integrity at all times.
- (b) Act honestly, in good faith and in the best interests of PAC Trading.
- (c) Work to the best of your ability, giving proper attention and care to the job.
- (d) Use the powers of office held for proper purposes, and in the best interests of PAC Trading as a whole.
- (e) Comply with all lawful and reasonable directions and instructions from your Supervisor, Manager or Director.
- (f) Not make improper use of information acquired through their roles.
- (g) Not disclose non-public information except where disclosure is authorised or legally mandated.

- (h) Keep confidential information received during the exercise of their duties and such information remains the property of PAC Trading and it is improper to disclose it, or allow it to be disclosed, unless that disclosure has been authorised by the person from whom the information is provided, or if disclosure is required by law.
- (i) Be respectful and inclusive in your interactions with others.
- (j) Maintain a cooperative and collaborative approach to working relationships which includes sharing relevant information with others and adopting respectful behaviours and language in your interactions with others.
- (k) Not engage in conduct likely to bring discredit upon PAC Trading.
- (l) Inform yourself of and comply with PAC Trading's policies and procedures.
- (m) Observe safe work practices and report hazards, incidents, injuries, or unsafe work practices.
- (n) Report any behaviour considered to be unethical or inappropriate to your Supervisor or PAC Trading's Risk Manager.
- (o) Use materials, equipment, supplies and other resources wisely for proper purposes and prevent their misuse.

3. Conflicts of interest:

You are expected to devote your best efforts to the interests of PAC Trading in the performance of your duties or services. You must avoid any conflict between the interests of PAC Trading and your own personal interests. A personal interest may be direct, indirect, financial, or non-financial.

Unless you have the written approval of the Chief Executive Officer, employees may not take up employment or any form of paid or unpaid work with a competitor or an organisation doing business or seeking to do business with PAC Trading.

Employees are permitted to engage in outside work activities unless the activity conflicts with PAC Trading's interests. Outside work activities may give rise to a conflict of interest if:

- (p) it places you in a position of appearing to represent PAC Trading.
- (q) it prevents you from fully performing work for which you are employed or engaged to perform at PAC Trading (including reasonable overtime)
- (r) it lessens the productivity or efficiency reasonably expected of you in your job;
or
- (s) it is for an organisation or individual whose business competes with PAC Trading.

From time to time, employees may be reasonably required to work hours in addition to your ordinary hours of work in order to successfully perform your role. In cases of conflict with any outside work activity, your obligations to PAC Trading must be given priority.

Disclosure of potential conflict of interests

You must disclose any possible conflicts so that PAC Trading may assess and prevent potential conflicts of interest from arising. A potential or actual conflict of interest occurs whenever you are in a position to influence a decision or action that may result in a personal gain for yourself, family member, friend or business associate as a result of PAC Trading dealings.

If you have any questions whether an action or proposed course of conduct would create a conflict of interest, you should immediately contact your Supervisor to obtain advice on the issue.

4. Acceptance of Gifts:

Special care must be taken when accepting gifts or benefits as they may create a sense of obligation to the donor. You must declare any gift or benefit valued at more than \$50 to your Supervisor so that a decision may be made as to whether to accept or return the gift or benefit or to share it with work colleagues.

5. Confidentiality:

Both employees and contractors will receive or have access to information that is confidential to PAC Trading.

Confidential Information means:

- (a) all information whether oral, graphic, written or in any other form (**Information**) regarding the current or future business interests, trade secrets, methodologies or affairs of the Employer;
- (b) all Information that is by its nature confidential, or is designated by the Employer as confidential, or which the Employee knows or ought reasonably to be expected to know is confidential (including, but not limited to, trade practices, pricing policies and customer information);
- (c) all other Information belonging or relating to the Employer; and
- (d) Information concerning the business, finances or customers of a third party which the Employer has an obligation not to disclose,

but excluding:
 - (e) any Information which is lawfully already in the public domain, or becomes part of the public domain other than due to the fault of the Employee or any person for whom the Employee is responsible; and
 - (f) any Information which is required to be disclosed by law.

You are not authorised to disclose or discuss Confidential Information outside of PAC Trading and should only disclose such Confidential Information to those people within PAC Trading

who need to know the information in the course of their work, unless specifically authorised otherwise.

Client information or commercially sensitive documents, records and files are to be stored securely and not left visible or accessible. Computer access passwords, where applicable, should not be shared or revealed to others.

Your obligation to keep Confidential Information confidential continues after your contract and/or employment with PAC Trading ceases.

6. Use of equipment:

PAC Trading provides equipment, materials, and uniforms necessary for employees to perform their role.

You are expected to exercise care in the use of PAC Trading equipment and property and use such property only for authorised PAC Trading purposes. Loss, damage or theft of PAC trading property must be reported immediately. Negligence in the care and use of PAC Trading property may be considered a breach of this Code of Conduct.

At the conclusion of your employment or contract, you must return all PAC Trading property, uniforms (if relevant), equipment, keys or access passes in your possession or control.

PAC Trading expects you to maintain a neat, well-groomed appearance and an appropriate standard of personal hygiene at all times. Where you are required to wear a uniform, you are expected to maintain the uniform in a clean and presentable condition at all times. Examples of inappropriate dress include:

- (a) clothing which is soiled or in a state of disrepair;
- (b) slogans or offensive language/motifs/pictures on clothing of a suggestive or political nature;
- (c) revealing, tight fitting or see-through attire (including midriff shirts, singlets, short shorts or skirts, and low-cut tops);
- (d) track suits, sports-wear or active wear; and
- (e) any footwear that would constitute a health or safety risk (e.g. thongs, non-enclosed shoes in areas where machinery is operated).

Please speak with your Supervisor if you have any questions about appropriate dress standards.

7. Anti-bribery:

PAC Trading has zero tolerance towards all forms of bribery. An example of bribery is someone being pressured to make payments or payments in kind to induce others to act in favour of PAC Trading.

The offering and accepting of bribes to and from individuals or entities to win business or to influence a business decision that affects PAC Trading is prohibited.

Making or requesting such payments could compromise everyone involved, and may expose PAC Trading, you and others to criminal prosecution and serious penalties.

8. Security dealings:

Inside information

A person is in possession of "inside information" in relation to securities in circumstances where:

- (a) the person possesses information that is not generally available and, if the information were generally available, a reasonable person would expect it to have a material effect on the price or value of the relevant securities; and
- (a) the person knows, or ought reasonably to know, that the information is not generally available and, if it were generally available, a reasonable person would expect it to have a material effect on the price or value of the relevant securities.

A reasonable person would be taken to expect information to have a material effect on the price or value of securities if the information would, or would be likely to, influence persons who commonly invest in securities in deciding whether or not to deal in the securities in any way.

If you possess "inside information" in relation to particular securities, you must not:

- (a) deal in those securities in any way; nor
- (b) directly or indirectly communicate the information, or cause the information to be communicated, to another person if the person knows, or ought reasonably to know, that the other person would, or would be likely to, deal in the securities in any way or procure a third person to deal in the securities in any way.

If you deal in securities while in possession of "inside information" you may be liable to both civil and criminal penalties and possibly imprisonment.

9. Suspected breaches of the Code of Conduct:

If you suspect or know that a person has breached the Code of Conduct, you must contact your Supervisor immediately.

You are also reminded that PAC Trading's Whistleblower program is available should you wish to speak with someone on a confidential basis regarding any challenges you are facing. You can contact the program, **Stopline, on 1300 30 45 50** or by sending an email to **makeareport@stopline.com.au**

If you think you may have breached the Code of Conduct (either knowingly or accidentally) it is in your best interests to speak with your Supervisor immediately.

PAC Trading will take the necessary steps to investigate the alleged breach in accordance with principles of procedural fairness to determine whether there has in fact been a breach of the Code of Conduct.

If you, or another individual, is found to have breached this Code of Conduct, PAC Trading may take disciplinary action, which for employees, may include termination of employment.

10. Document Control:

This Code of Conduct Policy is subject to periodic review and updates as necessary to ensure compliance with changes in Australian legislation, organizational needs, and best practices. The responsibility for reviewing and updating this policy lies with the People & Culture Leader in collaboration with relevant stakeholders.

11. Version Control:

Document prepared by : Rodney O'Connell	Job Title : Chief Commercial Officer	Signature : <i>Rodney oconnell</i>	Date : 20.03.2024
Reviewed by subject matter expert : Claire Mawn	Job Title : People & Culture Leader	Signature : <i>Claire Mawn</i>	Date : 20.03.2024
Document Version : 1.0			
Document Review Date : 20.03.2024 (date of original review)			

12. Revision History:

Revision	Modified By	Description of changes
1		
2		