

CODE OF CONDUCT

We believe a company can succeed in today's highly competitive market only through a commitment to rock-solid values and ethical conduct. At Goodman Agencies Limited we have a long-term perspective that values and protects the reputation of our company as an ethical and responsible business. We want our employees, customers and communities to share in the benefits of upholding our reputation. We act with honesty and integrity, not compromising the truth.

Who does the code of conduct apply to?

Code of Conduct is for everyone who serves Goodman Agencies Limited - our directors, managers, employees, and customers. Each of us has an opportunity and an obligation to provide ethical leadership by example. And we can demonstrate that leadership by being ethical in all that we do, whether it is a major business transaction or simply how we treat our colleagues each day.

Our reputation is one of our most valuable business assets, and we strive to preserve and enhance it. Each and every one of us is responsible for maintaining the highest standards of honesty, integrity and trustworthiness.

What we believe:

1. **Abide by the local laws and company policies:** we comply with any lawful instruction given by any person having authority to make or give such an instruction. Employees are responsible to carry out and comply with Goodman Agencies Limited policies and procedures and legislation. It is acknowledged that employee views, on particular matters, may differ from those of the company; however such views must not either interfere with the performance of an employee's duty or prevent the employee from supporting Goodman Agencies Limited objectives.
2. **Personal and professional responsibility:** we require to undertake our duties in a professional, responsible, conscientious and ethical manner and to act in the best interests of Goodman Agencies Limited. We are expected to act honestly in all of their duties when dealing with clients, suppliers, contractors and fellow employees.
3. **Natural justice, fairness and equity:** If an employee is required to investigate complaints against other employees or issues affecting employees, they must act consistently, promptly, and fairly and in a timely manner. The principles of natural justice are maintained in dealing with each investigation.
4. **Confidentiality and respect of company property:** Employees have access to personal or commercial information relating to individuals, the public, or the financial or other operations of Goodman Agencies Limited. This information is to be used for official purposes only and should remain secure and confidential. It is important that the community has confidence that information acquired by Goodman Agencies Limited is only used for the stated purposes for which it was collected.
5. **Conflict of interest:** If an employee becomes aware of a potential for conflict of interest then they must notify their manager of the potential or actual conflict of interest. Goodman Agencies Limited expects employees to: Declare any likely conflict of interest to supervisors; and avoid any detrimental outcome as a result of a conflict of interest.
Employees should ensure that there is no conflict or incompatibility between their personal interests, whether pecuniary (e.g. money) or non-pecuniary and the impartial fulfilment of their

duties. It is not possible to define all potential areas of conflict of interest but a number of situations are referred to below.

- gifts and hospitality offered where there is an expectation of a return favour (which may or may not be to the detriment of Goodman Agencies Limited)
- additional employment that prevents or hinders the performance of a person in their role
- decisions regarding the employment or promotion of relatives or friends
- promotion of or soliciting for clients for own private business

If an employee is in doubt as to whether a conflict exists, they must contact their manager. Wherever possible employees should disqualify themselves from situations of conflict of interest.

Where an employee has an impartiality, financial or proximity interest in any matter regarding provisions outlined within this Code, or which might be perceived as being in conflict with the interest of another person who may be affected, then the employee should immediately disclose this to his/her manager or at the meeting if prior disclosure is not possible.

6. **Record and information technology management:** Employees are aware of their record keeping responsibilities and are reminded there is a legal requirement to adhere to proper records management practices and procedures. All employees must therefore ensure that Goodman Agencies Limited documents are not placed in unofficial or private filing systems in official files. Employees must not remove documents from official files. They are controlled records, and must be complete, up-to-date and capable of providing organisational accountability when officially scrutinised. Employees do not access information which they are not authorised to access or use, and must not allow any other person access for any reason.
7. **Use of official information:** While employees can contribute to public debate on social issues there are some circumstances in which public comment is inappropriate. Public comment by employees should not imply that the comment, although made in a private capacity, is in some way an official comment by Goodman Agencies Limited. The employee may only disclose official information, with due regard to confidentiality, in order that it is in their official capacity and duties.
8. **Occupational Safety and Health Act:** Goodman Agencies Limited is committed to providing a safe and healthy workplace for all employees and visitors however, employees have a responsibility to make the workplace a safe and healthy place for all concerned, as far as reasonably practical. It is therefore important that employees are familiar with the standards or procedures in their particular area of work. If employees have not been advised of these standards or procedures during the induction process, they must as a matter of urgency ask their immediate manager to obtain the necessary information.