



Code of Conduct

February 2025

Context & Purpose

Xenith Holdings Pty Ltd (Xenith) and its controlled entities expects that its employees will always display the highest standards of professional and personal conduct in serving the needs of customers and stakeholders.

The Code of Conduct is a set of standards, or rules of behaviour that guide the decisions, procedures and systems of an organisation in a way that contributes to the welfare of its key stakeholders, respects the rights of all constituents affected by its operation.

Policy



All Xenith employees are expected to display the following:

1. Obligations
2. Personal Conduct
3. Professional Conduct
4. Stewardship of Company Resources
5. Protection and Promotion of the Company's Reputation
6. Dealing with Conflicts of Interest.
7. Dealing with Conflicts of Interest.

Obligations

All Xenith employees have an obligation and duty of care to:

- › Comply with prevailing community standards of equity, justice, fairness and compassion in dealing with others within and beyond the company
- › Perform duties in a responsible and professional manner, with due regard for company policies and other legal requirements and obligations
- › Exert responsible stewardship of company resources
- › Promote and protect the company's reputation in the wider community
- › Act appropriately when a conflict arises between our self-interest and our duty to the company

Personal Conduct

All Xenith employees are expected to:

- › Treat everyone with courtesy, respect, kindness, consideration, and sensitivity to their rights
- › Refrain from all forms of harassment and discrimination based on gender, race, religious belief, political affiliation, pregnancy, disability, sexual orientation or illness
- › Always act honestly, in good faith, and respectful of the trust placed in us
- › Respect each individual's rights to privacy and keep personal information in confidence
- › Consider the impact of our decisions and behaviour on the well-being of others
- › Refrain from acting in any way that would unfairly harm the reputation and career prospects of other employees
- › Refrain from allowing personal relationships to affect professional relationships
- › Use company technical and physical resources properly, responsibly and for legitimate purposes only

- › Promote Xenith wherever possible in our professional dealings with others
- › Embody the Xenith Code of Ethics Policy (XEN-HS-POL-001)
- › Uphold Xenith's key values of:
 - Client Value
 - Technical Excellence
 - Positive Workplace.

Professional Conduct

All Xenith employees are expected to:

- › Perform our duties diligently, impartially, conscientiously, with integrity, and to the best of our ability
- › Take our responsibility for the health and safety of ourselves and others when carrying out our duties
- › Keep up to date with advances and changes in the body of knowledge and the professional and ethical standards relevant to our area of expertise
- › Strive to always achieve the highest service and professional standards
- › Comply with any relevant legislative, industrial or administrative requirements including observance and application of anti-discrimination policy
- › Comply with the principles of environmental responsibility
- › Foster teamwork and collegiality among all employees, and always give due credit to the contributions of others
- › Maintain adequate documentation to support any decisions made
- › Take no improper advantage of any official information gained in the course of our employment
- › Refrain from allowing personal political views and/or affiliations or other personal interests to influence the performance of duties or exercise of responsibilities.

Stewardship of Company Resources

All Xenith employees are expected to:

- › Use company technical and physical resources properly, responsibly and for legitimate purposes only
- › Seek permission before using company property for personal purposes
- › Use resources in a manner that causes no harm to the community or environment
- › Strive to always obtain value for company money spent and avoid waste and extravagance in the use of company resources
- › Secure all company property against theft or fraud
- › Maintain the integrity and security of all company intellectual property
- › Maintain the security, integrity and confidentiality of all relevant company commercial and other information.

Protection and Promotion of the Company's Reputation

All Xenith employees are expected to:

- › Promote the company wherever possible in our professional dealings with others
- › Refrain from representing ourselves as spokespersons, or acting for or on behalf of the company unless authorised to do so (and when in doubt seek advice from the Management Team)

- › Refrain from engaging in any activity that may compromise the company's integrity and reputation.

Dealing with Conflicts of Interests

All Xenith employees are expected to:

- › Ensure that our financial and other interests and actions do not conflict or seem to conflict with the obligations and requirements of our company position – or advance our own interests over those of the company
- › Avoid any financial or other interest or undertaking that could directly or indirectly, compromise the performance of our duties
- › Take all suitable measures to avoid or deal appropriately with any situation in which we may have or been seen to have a conflict arising out of our relationship with others within or beyond the company
- › Notify the Management Team, as appropriate, of the existence of an actual or potential conflict of interest
- › Declare our relationship when participating in decisions affecting another person with whom we have a personal relationship.

All Xenith employees must comply with this Code of Conduct and report any breaches to their Manager, as appropriate. Employees whose conduct falls below the standards outlined in the Code will be counselled accordingly and/or disciplined in accordance with Xenith Consulting Pty Ltd disciplinary procedure.

Disclaimer

The Company reserves the right to amend or rescind this procedure at any time without notice.

Document Control

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