

PACT

Code of Conduct

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ADA (Australian Defence Apparel P/L)

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Introduction

Australian Defence Apparel (ADA) is committed to making a difference for our customers, employees and the communities where we live and work. We actively promote a culture of honest and ethical behaviour and are equally as mindful of how our results are achieved as the results themselves. This Code of Conduct (Code) is built on our Core Values of Excellence, Passion, Integrity and Collaboration.

We are all responsible for ADA's reputation. Inappropriate behaviour by even one person could jeopardise the reputation ADA has worked hard to establish, as well as the trust that has been placed in us by our customers, employees and business partners.

Purpose

This Code provides guidance on the standards of behaviour we expect of our employees. It outlines both our legal and our ethical obligations whilst we are at work - what we are obliged to do and what we should do. This Code should be read in conjunction with our other policies listed in the References and throughout this document.

Scope

This Code applies to all the operations and activities of ADA and its subsidiaries. All ADA directors and employees are expected to comply and conduct themselves in accordance with this Code.

It is the responsibility of Managers and Supervisors to ensure that employees and contractors within their area are aware of their responsibilities under this Code.

Consultants, contractors and business partners working with or for ADA should be informed of this Code and other relevant policies and guidelines, including the expectation that they will act in accordance with them.

Our Core Values

At ADA our shared values are what makes a difference. They define who we are, what we stand for and how we do things. We are determined, we strive to amaze, and we are EPIC!

Excellence:

We empower our people. We give you the opportunity to think outside the box, share your brilliance and make an impact.

Passion:

We embrace your inner spark and encourage you to bring your passions and ideas to the table.

Integrity:

Our culture is straightforward, honest and ethical in all that we do. We inspire you to do the same.

Collaboration:

We are one Team. We are all on the same journey and evolving together. We leverage our inner Einsteins' and achieve great things.

Our Purpose & Promise

ADA's mission is to provide a solution-focused experience from design to delivery.

- To provide our customers with the capabilities to move from scalable prototyping to production under one roof.
- Offer cutting-edge fabrics to optimise form and function making our client's job easier.
- Equip our customers with access to our in-house design and product development teams to provide intelligent solutions to complex requirements.
- Provide streamlined and customised web portals to manage assets and demands.
- Empower our customers and their teams to perform in high-quality uniforms.
- Source solutions for warehousing and distribution from our facilities.

Personal Conduct

As an employee of ADA, you are expected to conduct yourself in a professional manner that fosters trust, confidence and goodwill in customers, colleagues, suppliers and the community.

You can demonstrate this by:

- Acting in the best interests of ADA, its customers and stake-holders and not allowing your own interests to override the interests of the company.
- Acting with due skill, care and diligence when conducting business.
- Maintaining corporate confidentiality at all times.
- Respecting the intellectual property rights of others.
- Avoiding and/or disclosing any real or perceived conflicts of interest.
- Being true to your word.
- Treating customers, colleagues and members of our community with dignity, fairness and respect.
- Taking care to avoid misleading or deceiving others.
- Complying with the policies, procedures, laws and regulations applying to your role.
- Protecting the long-standing good reputation and public image of ADA.

Workplace Health & Safety

At ADA, we are committed to providing a safe working environment and complying with all Federal and State laws and regulations regarding safety in the workplace.

We all need to take responsibility for our own health, safety and wellbeing and for those we work with. You can take responsibility by:

- Reporting any health and safety issues immediately.
- Abide by health and safety policies and following safety instructions at all times.

ADA's Safety Management System is certified to the international standard ISO 45001:2018. For further information refer to ADA OHS Policy – BMP 6.43 and ADA's Integrated Management System Manual BD 001.

Harassment & Bullying

ADA does not tolerate unlawful discrimination, bullying, harassment or other unacceptable conduct. As an employee you can help to create the right environment by supporting your colleagues, working collaboratively and ensuring that no one in your workplace is being unlawfully discriminated against, bullied or harassed.

Harassment includes unwelcome behaviour of a sexual nature. If you are concerned about sexual harassment in your work area seek advice from the HR Manager or HR Business Partner.

Our Whistleblower process provides an additional avenue to confidentially report bullying, harassment or other suspected unlawful conduct.

For further information, refer to BMP 6.08: Inappropriate Workplace Behaviour, BMP 6.44: Harassment Policy and BMP 6.33 Whistleblower Protection Policy.

Human Rights

ADA expects all our employees to respect human rights and maintain a work environment where this is understood and valued.

We are committed to ensuring that our operations and supply chains do not engage in modern slavery practices. We will act as quickly as practicable to remedy any human rights violations that are reported to, or identified by us, including exploitative labour practices.

All our employees must deal fairly, honestly and ethically with all external parties engaged by ADA, including agents, contractors, consultants and other intermediaries both within and outside Australia. All business relationships must be based on price, quality, service and reputation.

ADA reserves the right not to do business with external parties who do not share and demonstrate our commitment to the safe and ethical manufacture and supply of goods and services.

For further information, please refer to BMP 6.26 ADA Modern Slavery Statement and BMP 6.33 Whistleblower Protection Policy.

Inclusion & Diversity

Diversity is difference in all its forms, whether visible or invisible. At ADA, we are committed to having an inclusive workplace where everyone feels welcome and can be themselves regardless of their gender, gender identity, age, ethnicity or cultural background, sexual orientation, religion, health and physical ability.

For more information, refer to BMP 6.38: Equity, Inclusion & Diversity Policy.

Environment

At ADA, we are committed to doing business in an environmentally responsible manner in compliance with environmental law, regulations and environmental license conditions.

We will identify environmental risks that may arise out of our operations and plan and implement strategies to effectively manage and reduce them.

Our commitment to the environment is outlined in BMP 11.06 - Environmental Policy and detailed in our Integrated Management System Manual - BD-001.

Use of Information and information systems

As an employee of ADA, the use of the Internet is permitted and encouraged where such use supports the goals and objectives of the business. You are expected to use your computer, telephone, other supplied devices and network systems appropriately.

These devices should not be used to:

- Communicate, view or distribute inappropriate, sexually explicit or offensive material.
- Spread profane, derogatory, discriminatory or harassing comments, or threatening or abusive language.

If you receive inappropriate material, you should immediately delete it and notify the sender to stop sending the material.

You should also notify your Supervisor and/or Department Manager. If you accidentally connect to an inappropriate website, you should close it down immediately.

Your network passwords will need to be changed every 60 days and you should not provide your log in details to anyone. Sharing login details and passwords contravenes our IT Security policies and procedures. It may be presumed you are responsible for all actions undertaken using your identity/ login and therefore you should protect these from use by others.

You should be aware that ADA reserves the right to monitor Internet traffic and access any data that is created, sent or received through its online connections by employees, therefore you should have no expectation of privacy regarding your access to and use of the Network Systems.

Unauthorised distribution or copying of ADA business information, including personal and customer information, contravenes our policies and procedures and may cause ADA to breach its legal and regulatory obligations.

ADA's Information Management System is certified to ISO 27001:2022. For additional information please refer to:

- BMP 6.05 Email Guidelines Policy
- BMP 14.02 Acceptable Use Policy (Networks)

Use of Social Media

ADA is supportive of you making appropriate use of social media in your personal life. You remain personally responsible for the content you publish in a personal capacity on any form of social media platform.

Where your comments or profile can identify you as an ADA employee, you must act lawfully, responsibly and be respectful of the company, our customers and suppliers, your colleagues and everyone you interact with on-line. You should only disclose publicly available information and adhere to the Terms of Use of the respective social media platform/ website as well as copyright, privacy, defamation, contempt of court, discrimination, harassment and other applicable laws.

Be mindful that even if you do not post on social media as a representative of ADA, your interactions on social media may affect ADA's reputation.

When using Social Media, you must ensure your personal use does not interfere with your work.

For further information, please refer to BMP 14.03 Social Media Policy.

Media Discussions & Publicity

Public statements to the media regarding ADA must not be made unless you are authorized to do so by the CEO.

External photographers are not permitted on site to photograph the interior of ADA premises without approval from the CEO, or the Marketing & Communications Manager.

Your personal agenda should not be placed ahead of ADA's customers or our organization as public comments could prove damaging to our reputation. If you are concerned regarding conduct you believe that you may have observed, please refer to BMP6.33 Whistleblower Protection Policy to ensure you have protections under the Commonwealth Corporations Act.

Honesty & Integrity

You must act with honesty and integrity in your dealings with customers and colleagues. If you make any business-related purchases, please refer to the ADA Expenses process which is outlined in BMP 8.08 - Expense Claims for the correct process to follow.

When mistakes are identified, we must admit them to our customers and colleagues. Errors, omissions and breaches of ADA's regulations should not be concealed. If you become aware of, or suspect any inappropriate conduct or wrongdoing as an employee, you have a duty to report your concerns, or seek guidance from either:

- Your Supervisor or Department Manager
- The HR Department
- The Whistleblower hotline service

For further information, please refer to BMP 6.33 Whistleblower Protection Policy.

ADA does not tolerate any reprisals, or threats of reprisals against any employee who reports known or suspected misconduct. The Whistleblower Protection Program provides support and protection to employees who report concerns to the program.

Fairness

You must treat all existing and potential customers and suppliers fairly. This means that when we provide products or services to a customer, or accept them from a supplier, they must be lawful, ethical and appropriate to the requirement.

You must always ensure when dealing with customers, that products, services and advice are provided in accordance with local laws and regulations. You should provide information in a way the customer will understand and in a manner that allows for an informed choice.

You must not make false, misleading or deceptive representations to induce a customer to enter a transaction or enter into a transaction without the customer's approval.

You must not use the confidential information from customers for the benefit of anyone else, including other customers, suppliers, ADA, or for yourself. All dealings with Customers and Suppliers must reflect ADA's values.

Customer complaints must be handled with sensitivity and in a timely manner. The Customer Complaint Procedure (BMP 2.10 Customer Complaint and Issue Escalation Process) and BIR Procedure (BMP 7.05 Business Improvement Report) should be used as appropriate.

You must never engage in collusive behaviours with our competitors. You must act in a way that ensures ADA competes freely and fairly, abiding by the laws and regulations which apply in all countries and states in which we operate.

Prevention of Fraud & Corruption

We are all responsible for the prevention of fraud and corruption. Fraudulent or corrupt activity involves dishonest actions or dishonestly failing to act, that cause actual or potential financial loss, or an unjust advantage. This includes:

- Theft of money, data or property
- Deliberately falsifying, concealing or destroying documents
- Acts of bribery

Products and services must not be made available if you become aware or have reason to suspect, they will be used for criminal or illegal activity. If you suspect fraud or corrupt activity may be occurring, or you are pressured by a customer or colleague to depart from our policies or procedures, tell your Supervisor or Department Manager, or use our Whistleblowing process by either contacting the Whistleblower Disclosure Officers, or our Whistleblower Protection hotline.

Remember that failure to report fraud or corruption may be regarded as seriously as the fraud itself.

For more information, please refer to BMP 6.21: Fraud and Corruption Control Policy and BMP 6.33: Whistleblower Protection Policy.

Conflicts of Interest

ADA's commercial interests and your personal interests must be managed so as not to compromise your ability to make sound, objective business decisions. You must understand and comply with the Conflict of Interest Policy (BMP 6.03 Conflict of Interest Statement).

You must always exercise caution in your commercial and personal relationships with customers, suppliers and colleagues to ensure they do not involve obligations that may prejudice or influence your business relationship or conflict with your duties.

If you participate in non-ADA business ventures or employment, speak with your Supervisor or Department Manager and the HR Department to ensure that there is no conflict of interest. If you are involved in voluntary activities and you believe that these activities may lead to a conflict of interest with your work, before you participate, consult your Supervisor or Department manager and the HR Department.

If you make important purchasing decisions for ADA and people close to you (e.g. partner, relative or friend) have an interest in or are the actual suppliers of the goods and services being purchased, you must advise your Supervisor or Manager and the HR Department so that it can be documented.

Benefits, Gifts and Entertainment

ADA understands that you may give or accept gifts, entertainment and hospitality in the course of your employment with ADA. However, you must ensure these are appropriate. They should be of only moderate value and not give rise to any perceived or actual conflict of interest, or undue influence. 'Moderate' can vary depending on the circumstances but, as a guide, ADA employees are required to declare all gifts and entertainment valued at or above \$250 to their Department Manager. Gifts and entertainment must also be declared in accordance with our Fraud & Corruption Control Policy (BMP 6.21).

You must obtain approval for any donations, sponsorships or charitable contributions you accept from, or give to a third party on behalf of ADA and record these appropriately.

ADA does not allow the use of corporate funds, resources or property for the support of political parties or political candidates for any office (national or local). No employee of ADA is authorized to make or approve such a contribution. Contributions on behalf of the Company are only permitted if approved by the Board.

Employees are free to participate outside of work as an individual in the political process provided it is made clear they are not acting on behalf of or representing ADA.

For more information, please refer to BMP 6.03 Conflict of Interest Statement and BMP 6.21 Fraud and Corruption Control Policy.

References

AS/ISO 37301: 2023 - Compliance Management Systems - Guidelines
BD 001 - Integrated Management Systems Manual
BMP 1.03 - Compliance Policy
BMP 1.04 - Risk Management Framework
BMP 2.10 - Customer Complaint and Issue Escalation Process
BMP 6.03 - Conflict of Interest Statement
BMP 6.05 - Email Guidelines
BMP 6.08 - Inappropriate Workplace Behaviour Policy
BMP 6.21 - Fraud and Corruption Control Policy
BMP 6.26 - ADA Modern Slavery Statement
BMP 6.33 - Whistleblower Protection Policy
BMP 6.38 - Equity, Inclusion & Diversity Policy
BMP 6.43 - OHS Policy
BMP 6.44 - Harassment Policy
BMP 8.08 - Expense Claims Policy
BMP 11.06 - Environmental Policy
BMP 14.02 - Acceptable Use Policy (Networks)
BMP 14.03 - Social Media Policy




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Let's make a PACT!

PACT is ADA's ESG program. It is a movement towards Promoting Accountability, Community and Transparency. Through this innovative initiative, PACT and its partners are not just contributing to global ESG standards - they're reshaping them.

The PACT Program includes 4 pillars and tangible pathways to achieve our vision.

ESG Program Name	PACT			
4 Pillars Sits under ESG	 Planet	 People	 Practice	 Performance
Pathways Sits under Pillars	Designing for End of Life Circularity Waste Reduction	Indigenous Partnerships Diversity & Inclusion Employer of Choice Responsible Supply Chain Corporate Social Responsibility	Ethical Trade Transparency Risk Management	Job Growth Exceeding Customer Expectations Research, Development & Innovation Responsible purchasing and sourcing

Join us as we define what it means to do business in the 21st century!

Learn more about PACT
ada.com.au/pact



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