

PACT

Code of Conduct

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ADA (Australian Defence Apparel P/L)

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Introduction

Australian Defence Apparel (ADA) is dedicated to upholding the highest standards of ethical and professional conduct in everything we do. Our reputation is built not only on the quality of our products and services, but also on the integrity and behaviour of every member of our team.

This Code of Conduct sets out the principles and expectations that guide our actions and decisions, ensuring we act responsibly, respectfully, and in accordance with our core values of Excellence, Passion, Integrity, and Collaboration.

Every employee, director, contractor, and business partner plays a vital role in maintaining ADA's reputation and the trust placed in us by our customers, colleagues, and communities. Inappropriate behaviour by even one individual can impact our organisation and those we serve.

By following this Code, we demonstrate our commitment to ethical business practices, a safe and inclusive workplace, and the wellbeing of our people and stakeholders. We encourage everyone to speak up if they have concerns, and to seek guidance whenever they are unsure about the right course of action.

Purpose

The ADA Code of Conduct sets out the standards of behaviour expected from everyone representing Australian Defence Apparel. It provides clear guidance on both our legal responsibilities and our ethical obligations, helping us make decisions that reflect our values and protect our reputation. This Code is designed to support a safe, respectful, and inclusive workplace, and should be read alongside our other policies and procedures.

Scope

This Code applies to all employees, directors, contractors, consultants, and business partners engaged in ADA's operations and activities, both in Australia and internationally. Managers and supervisors are responsible for ensuring that everyone in their teams understands and follows the Code. All third parties working with or for ADA are expected to act in accordance with these standards and related policies.

Our Core Values

At ADA, our core values are the foundation of our culture and guide every decision we make. They define who we are, how we work together, and how we serve our customers and communities. By living these values every day, we create an environment where people feel empowered, respected, and inspired to achieve excellence. Our values are more than words; they are commitments we uphold in every interaction and every aspect of our business. Together 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 a representative of ADA, you are expected to uphold the highest standards of professionalism in all your interactions. Your conduct should foster trust, confidence and goodwill among customers, colleagues, suppliers and the wider community.

You demonstrate personal conduct by:

- Acting in the best interests of ADA, our customers and stakeholders and ensuring personal interests do not override those of company.
- Performing your duties with skill, care and diligence.
- Maintaining confidentiality of ADA information at all times.
- Respecting the intellectual property rights of others.
- Identifying and declaring any real or perceived conflicts of interest.
- Keeping your commitments and being true to your word.
- Treating everyone with dignity, fairness and respect.
- Avoiding misleading or deceptive behaviour.
- Complying with all relevant policies, procedures, laws and regulations.
- Protecting ADA's reputation and public image through your actions and decisions.

If you are ever unsure about the appropriate course of action, seek guidance from your manager or refer to ADA's policies. Remember your behaviour reflects on ADA and contributes to our culture and success.

Workplace Health & Safety

ADA is committed to providing a safe, healthy, and supportive work environment for everyone. We comply with all relevant Federal and State laws, regulations, and standards, and expect every team member to take responsibility for their own safety and the safety of others.

You can help maintain a safe workplace by:

- Promptly reporting any health and safety concerns, hazards, or incidents.
- Following all safety policies, procedures, and instructions at all times.
- Using equipment and protective gear as required.
- Supporting a culture where safety is everyone's priority and raising concerns without fear of reprisal.
- Participating in safety training and staying informed about workplace risks.

ADA's Safety Management System is certified to ISO 45001:2018. For further details, refer to the ADA OHS Policy (BMP 6.43) and the Integrated Management System Manual (BD 001).

If you are ever unsure about a safety issue, speak up and seek guidance. Together, we can ensure ADA remains a safe and healthy place to work.

Harassment & Bullying

ADA is committed to providing a workplace where everyone is treated with dignity and respect. We do not tolerate any form of unlawful discrimination, bullying, harassment, or other unacceptable conduct.

Every employee has a responsibility to help create a positive and inclusive environment by:

- Supporting colleagues and working collaboratively.
- Ensuring that no one is subjected to discrimination, bullying, or harassment.
- Speaking up if you witness or experience inappropriate behaviour.

Harassment includes unwelcome behaviour of a sexual nature, as well as any conduct that makes someone feel intimidated, offended, or unsafe. If you have concerns about harassment or bullying, you are encouraged to seek advice from the HR Manager or HR Advisor.

ADA's Whistleblower process provides an additional confidential way to report bullying, harassment, or other suspected unlawful conduct. We are committed to investigating all reports promptly and fairly, and to protecting those who raise concerns from retaliation.

For further information, please refer to:

- BMP 6.08: Inappropriate Workplace Behaviour Policy
- BMP 6.44: Harassment Policy
- BMP 6.33: Whistleblower Protection Policy

Human Rights

ADA is committed to respecting and promoting human rights in every aspect of our business. We strive to maintain a workplace where human rights are understood, valued, and protected.

We are dedicated to ensuring that our operations and supply chains do not engage in any form of modern slavery, forced labour, or exploitative practices. In line with the Australian Government's Modern Slavery Act 2018, ADA regularly assesses our business activities and suppliers to identify, address, and report on modern slavery risks in our operations and supply chains. We also recognise and uphold the International Labour Organisation's conventions and guidance, including the Forced Labour Convention (No. 29), the Abolition of Forced Labour Convention (No. 105), and the Protocol to the Forced Labour Convention, which set international standards for the prevention, identification, and remediation of forced labour and modern slavery.

If any concerns are identified or reported, ADA will act promptly to investigate and remedy the situation. All employees are expected to treat external parties—including agents, contractors, consultants, and suppliers—fairly, honestly, and ethically. Business relationships must be based on lawful, ethical, and transparent practices.

ADA reserves the right to cease business with any external party that does not share and demonstrate our commitment to safe and ethical practices.

For more information, please refer to:

- BMP 6.26: ADA Modern Slavery Statement
- BMP 6.33: Whistleblower Protection Policy
- Australian Government Modern Slavery Act 2018
- International Labour Organisation guidance on forced labour and modern slavery

Inclusion & Diversity

ADA values diversity in all its forms—both visible and invisible—and is committed to fostering an inclusive workplace where everyone feels welcome, respected, and able to be themselves. We celebrate the unique backgrounds, perspectives, and experiences that each individual brings to our team.

We do not tolerate discrimination based on gender, gender identity, age, ethnicity, cultural background, sexual orientation, religion, health, physical ability, or any other characteristic. We strive to create an environment where differences are embraced, and everyone has equal opportunities to contribute and succeed.

ADA encourages open dialogue, supports employee wellbeing, and provides resources to promote equity and inclusion. We expect all employees to treat each other with respect, to challenge bias, and to actively support a culture of belonging.

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

Environment

ADA is committed to conducting business in an environmentally responsible and sustainable manner. We comply with all applicable environmental laws, regulations, and license conditions, and strive to minimise the environmental impact of our operations.

Our Environmental Management System is certified to ISO 14001, demonstrating our commitment to continual improvement and best practice in environmental management. We proactively identify and manage environmental risks, and implement strategies to reduce waste, conserve resources, and prevent pollution.

ADA encourages all employees to support our environmental initiatives, follow relevant policies and procedures, and seek opportunities to improve our environmental performance. If you have suggestions for improving our environmental practices or notice any environmental concerns, please speak up and share your ideas.

Our commitment to our environmental responsibility is outlined in the ADA Environmental Policy (BMP 11.06) and detailed in our Integrated Management System Manual (BD-001).

Use of Information and information systems

ADA provides access to information systems and technology to support our business objectives and enable effective work. All employees are expected to use computers, phones and other devices responsively, in accordance with ADA policies and procedures.

Our information Security Management System is certified to ISO 27001, reflecting our commitment to best practice in protecting information assets and managing risks. You must:

- Use information systems only for legitimate business purposes.
- Protect confidential, personal and customer information from unauthorised access, disclosure or misuse.
- Never communicate, view or distribute inappropriate, sexually explicit or offensive material using ADA systems.
- Never spread profane, derogatory, discriminatory, harassing or threatening language.
- Immediately delete any inappropriate material received and notify the sender to stop, as well as inform your supervisor or manager.
- Change your network passwords as required and never share your log in details with anyone.
- Understand that ADA reserves the right to monitor internet usage and access data created, sent or received through its systems; you should have no expectation of privacy when using ADA's network.
- Never copy, distribute or use ADA business information, including personal and customer data, without proper authorization.

If you accidentally access inappropriate content or suspect a breach of information security, close the site immediately and report the incident.

For further guidance refer to:

- BMP 6.05 Email Guidelines Policy
- BMP14.02 Acceptable Use Policy (Networks)

Use of Social Media

ADA supports responsible and respectful use of social media. You remain personally responsible for the content you publish in a personal capacity on any form of social media platform.

If your profile or comments identify you as an ADA employee, you must:

- Act lawfully, ethically, and respectfully towards ADA, our customers, suppliers, colleagues, and the wider community.
- Only share publicly available information and never disclose confidential or proprietary ADA information.
- Adhere to the terms of use of each social media platform, as well as all relevant laws, including those relating to copyright, privacy, defamation, discrimination, and harassment.
- Be mindful that your online activity can impact ADA's reputation, even if you are not posting as a company representative.
- Ensure your personal use of social media does not interfere with your work responsibilities.

If you are unsure about what is appropriate to share or post, seek guidance from your manager or refer to ADA's Social Media Policy (BMP 14.03).

Media Discussions & Publicity

Only authorised ADA representatives may make public statements to the media about ADA's business, products, or operations. If you are approached by the media or wish to comment publicly on behalf of ADA, you must first obtain approval from the CEO.

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

Your personal views and activities should not be presented as those of ADA, and you must not allow personal agendas to take precedence over ADA's interests or reputation. Public comments, whether online or offline, can impact ADA's image and relationships.

If you have concerns about conduct that may affect ADA's reputation or compliance, please refer to the Whistleblower Protection Policy (BMP 6.33) to ensure you are protected under the Commonwealth Corporations Act.

Honesty & Integrity

ADA expects all employees to act with honesty and integrity in every aspect of their work. This means being truthful, transparent, and ethical in your dealings with customers, colleagues, suppliers, and other stakeholders.

You must:

- Be open and honest in all communications and business activities.
- Admit mistakes promptly and take responsibility for correcting them.
- Never conceal errors, omissions, or breaches of ADA policies or regulations.
- Report any suspected misconduct, inappropriate behaviour, or wrongdoing through the appropriate channels, if unsure, seek guidance from your Supervisor, Department Manager, the HR Department, or the Whistleblower Hotline.
- Ensure that all business transactions and expense claims are accurate and comply with ADA's policies and procedures.
- Treat others fairly and respectfully and avoid any actions that could compromise ADA's reputation or trustworthiness.

ADA does not tolerate reprisals or threats against anyone who reports concerns in good faith. All reports will be investigated promptly and confidentially, and support is available for those who raise concerns.

For further information, please refer to BMP 6.33: Whistleblower Protection Policy and BMP 8.08: Expense Claims Policy.

Fairness

ADA is committed to treating all customers, suppliers, and colleagues fairly and with respect. Fairness means providing products, services, and advice that are lawful, ethical, and appropriate to each situation.

You must:

- Ensure all dealings with customers and suppliers are transparent, honest and in accordance with applicable laws and regulations.
- Provide clear, accurate information to enable informed choices.
- Avoid making false, misleading, or deceptive representations to induce transactions.
- Never use confidential customer information for the benefit of anyone else, including other customers, suppliers, ADA, or yourself.
- Handle customer complaints with sensitivity, professionalism, and in a timely manner, following ADA's established procedures.
- Compete fairly and lawfully, avoiding collusive behaviour with competitors.

All interactions should reflect ADA's values and commitment to ethical business practices. If you are unsure about the fairness of a decision or action, seek guidance from your manager or refer to ADA's policies.

For further information, please refer to BMP 2.10: Customer Complaint and Issue Escalation Process and BMP 7.05: Business Improvement Report Procedure.

Prevention of Fraud & Corruption

ADA is committed to the highest standards of integrity and transparency. We have zero tolerance for fraud, corruption, bribery, or any dishonest or unethical conduct. Every employee is responsible for safeguarding ADA's assets and reputation by acting honestly and reporting any suspected wrongdoing.

You must:

- Never engage in or facilitate fraudulent, corrupt, or dishonest activities, including theft, bribery, falsification or destruction of documents, or misuse of ADA resources.
- Refuse to participate in any activity that could result in financial loss or unjust advantage for yourself or others.
- Immediately report any suspected fraud, corruption, or pressure to breach ADA policies to your supervisor, manager, or through the Whistleblower process.
- Understand that failing to report suspected fraud or corruption is itself a serious breach of this Code.
- Ensure all business dealings are lawful, ethical, and in line with ADA's values and policies.

ADA investigates all reports of suspected fraud or corruption promptly and confidentially. We protect those who raise concerns in good faith from retaliation.

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 requires all employees to act in the best interests of the company and to avoid situations where personal interests could conflict, or appear to conflict, with their professional responsibilities. A conflict of interest; actual, potential, or perceived, can compromise your ability to make objective decisions and may damage ADA's reputation.

You must:

- Disclose any personal, financial, or other interests that could influence, or be seen to influence, your decisions or actions at work.
- Avoid business, financial, or personal relationships with customers, suppliers, or colleagues that could create a conflict of interest.
- Seek guidance from your supervisor, manager, or the HR Department before engaging in any outside employment, business ventures, or voluntary activities that may conflict with your ADA role.
- Declare any situation where a close relative, partner, or friend has an interest in a supplier or contractor you deal with as part of your ADA responsibilities.
- Never use your position at ADA for personal gain or to benefit family, friends, or associates.

All conflicts of interest; actual, potential, or perceived, must be reported and documented in accordance with ADA's Conflict of Interest Policy (BMP 6.03). Failure to disclose a conflict of interest is a serious breach of this Code and may result in disciplinary action.

If you are unsure whether a situation constitutes a conflict of interest, seek advice before proceeding.

Benefits, Gifts and Entertainment

ADA recognises that gifts, entertainment, and hospitality may be offered or received in the course of conducting business. However, all such exchanges must be appropriate, transparent, and must not influence, or appear to influence, business decisions or create a conflict of interest.

You must:

- Only give or accept gifts, entertainment, or hospitality of moderate value and never in exchange for favourable treatment or business advantage.
- Declare all gifts and entertainment valued at or above $250 to your Department Manager and record them in accordance with ADA's Fraud & Corruption Control Policy (BMP 6.21).
- Seek approval before giving or accepting donations, sponsorships, or charitable contributions on behalf of ADA.
- Never use ADA funds, resources, or property to support political parties or candidates.
- Ensure that participation in political activities outside of work is clearly personal and cannot be perceived to be on behalf of ADA.

If you are unsure whether a gift or benefit is appropriate, seek guidance from your manager or refer to ADA's policies.

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

Breach of the Code and Accompanying Policies

ADA takes breaches of the Code of Conduct and related policies seriously. All employees, contractors, and business partners are expected to comply with these standards at all times.

Process for Managing Breaches:

1. **Reporting a Breach**

- Any suspected or actual breach should be reported promptly to your supervisor, manager, the HR Department, or through ADA's Whistleblower Protection process.
- Reports can be made confidentially and without fear of retaliation.

2. Initial Assessment

- The report will be reviewed to determine the nature and seriousness of the alleged breach.
- Where appropriate, the matter may be referred for formal investigation.

3. Investigation and Counselling

- Investigations will be conducted promptly, fairly, and confidentially, in line with the principles of procedural fairness.
- Employees will be informed of the concerns, given the opportunity to respond, and may bring a support person to meetings.
- Depending on the circumstances, informal or formal counselling may be undertaken to address performance or conduct issues, with clear expectations and support provided for improvement.

4. Disciplinary Action

- If a breach is confirmed, appropriate action will be taken in accordance with ADA's Counselling and Disciplinary Policy (BMP 6.06). This may include coaching, training, written warnings, changes to duties, or termination of employment or contract.
- Serious misconduct may result in summary dismissal without prior warning.

5. Outcome and Support

- The outcome will be communicated to relevant parties.
- Support is available for those affected, including access to Employee Assistance Programs.

6. Continuous Improvement

- Lessons learned from breaches may be used to improve policies, procedures, and training.

Non-Retaliation

ADA does not tolerate retaliation against anyone who reports a breach or participates in an investigation in good faith.

Reference:

For more information, refer to ADA's Whistleblower Protection Policy (BMP 6.33) and Counselling and Disciplinary Policy & Procedure (BMP 6.06).

Code of Conduct Review

ADA is committed to ensuring that our Code of Conduct remains relevant, effective, and aligned with best practice and legal requirements. The Code will be formally reviewed at least every two years, or sooner if required by changes in legislation, standards, or organisational needs. Employees are encouraged to provide feedback or suggest improvements at any time. Updates to the Code and related policies will be communicated to all staff, and training will be provided as necessary to support understanding and compliance.

Glossary of Key Terms

Bribery:
Offering, giving, receiving, or soliciting something of value to influence a decision or gain an unfair advantage.

Bullying:
Repeated, unreasonable behaviour directed towards an individual or group that creates a risk to health and safety.

Code of Conduct:
A set of guidelines outlining the expected behaviours and responsibilities of employees and representatives of ADA.

Conflict of Interest:
A situation where personal interests could improperly influence, or appear to influence, professional decisions or actions.

Corruption:
Dishonest or fraudulent conduct by those in power, typically involving bribery or the abuse of entrusted power for private gain.

Discrimination:
Unfair or unequal treatment of an individual or group based on characteristics such as gender, age, ethnicity, disability, or other protected attributes.

Fraud:
Wrongful or criminal deception intended to result in financial or personal gain.

Gifts and Entertainment:
Items or hospitality offered or received in the course of business, which may include meals, tickets, or other benefits.

Glossary of Key Terms

Harassment:
Unwelcome behaviour that intimidates, offends, or humiliates a person, including sexual harassment or any conduct that creates a hostile work environment.

Human Rights:
Basic rights and freedoms that belong to every person, such as freedom from discrimination, forced labour, and modern slavery.

ISO 14001:
An international standard for environmental management systems, demonstrating an organisation's commitment to environmental responsibility.

ISO 27001:
An international standard for information security management systems, ensuring the protection of information assets.

ISO 45001:
An international standard for occupational health and safety management systems, promoting a safe and healthy workplace.

Modern Slavery:
Situations where people are exploited through forced labour, human trafficking, debt bondage, or other forms of coercion.

Whistleblower:
A person who reports suspected wrongdoing, misconduct, or breaches of policy, often through confidential channels.

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 7.05 - Business Improvement Report Procedure
BMP 8.08 - Expense Claims Policy
BMP 11.06 - Environmental Policy
BMP 14.02 - Acceptable Use Policy (Networks)
BMP 14.03 - Social Media Policy

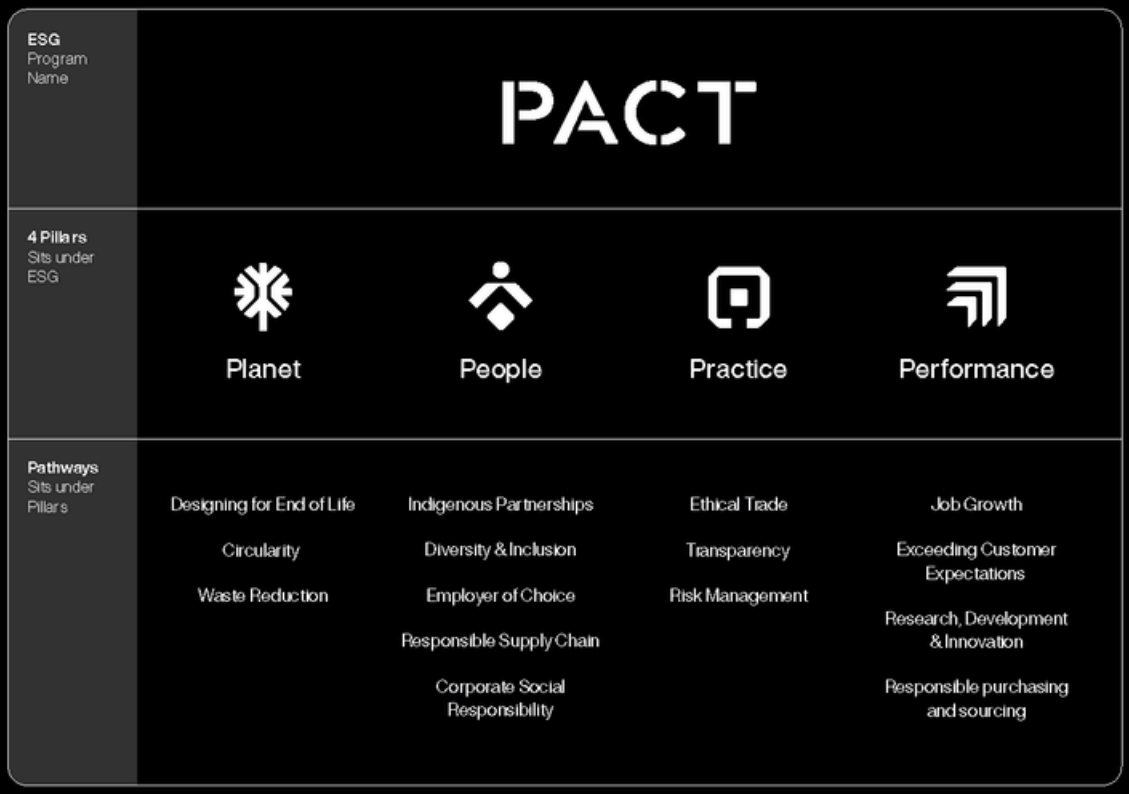
ADA™

Code of Conduct

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.



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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