

Code of Conduct

Why a Code of Conduct?

Cold Forged Products No.1 Pty Ltd is committed to honesty and integrity and exemplary conduct in every aspect of its corporate life, whether in its dealings with customers, suppliers, our employee or contractors, the regulatory authorities or the general public.

Mostly, what is necessary to be acting with integrity and honesty is clear, but there are some circumstances where some difficult issues arise. This Code is designed to assist you in making ethical, honest and correct decisions. It defines how we do business, and the conduct we expect of all people who work for Cold Forged Products No.1 Pty Ltd.

The Code does not attempt to describe every situation, law, rule or policy that may apply to you. There will be situations in which you will have to use your judgment on the most appropriate course of action, but the Code provides a framework which should guide you in making decisions in your day-to-day work.

Does this Code apply to me?

This Code applies to all people who work with Cold Forged Products No.1 Pty Ltd. It applies to all directors, officers, managers, employees, contractors, suppliers and consultants of Cold Forged Products No.1 Pty Ltd, no matter how senior or junior you may be, or how long or short the time you have been with Cold Forged Products No.1 Pty Ltd. It applies when you are on (or purportedly on) Cold Forged Products No.1 Pty Ltd property, no matter where located. It applies to any function you are at which is sponsored by Cold Forged Products No.1 Pty Ltd, organised by Cold Forged Products No.1 Pty Ltd, or connected to Cold Forged Products No.1 Pty Ltd in any way. It applies to everything Cold Forged Products No.1 Pty Ltd does. It applies to any conduct you do outside work that can impact Cold Forged Products No.1 Pty Ltd or its reputation.

Your personal responsibility

For everyone:

If this Code applies to you, it is important that you understand that:

This Code of Conduct is mandatory.

You are personally responsible for your own conduct in complying with all of the provisions of this Code.

You are personally responsible for reporting known or suspected breaches of this Code of Conduct to the Finance & Administration Manager or the Managing Director.

No-one—whether your supervisor, a colleague, a customer, or a manager—has the authority to order, request or influence you to breach this Code. You will not be excused for a breach because someone asked you to, or told you to, act in way that breaches this Code.

Breaches of this Code will have serious consequences. Your employment may be terminated for a breach of this Code. Where the breach also constitutes a breach of a law, Cold Forged Products No.1 Pty Ltd will cooperate with the appropriate law enforcement agency (for example, the Police, or the Work Health and Safety authority) and you may thus also face prosecution if the breach is also an offence.

For managers and those in higher positions:

If you are a manager, official, supervisor or someone in a trusted position, you should note that Cold Forged Products No.1 Pty Ltd holds you to a higher standard. Cold Forged Products No.1 Pty Ltd expects you to not only comply with the Code yourself, but to set an example for others, serving as a resource and educating other workers about the Code and expected standards of behaviour. You must live the Code, ensuring that there is a positive culture of integrity and ethics throughout every section of Cold Forged Products No.1 Pty Ltd. You should be able to respond to questions about the Code and how it applies, be familiar with (and follow) other Policies of Cold Forged Products No.1 Pty Ltd. You should accept complaints about breaches of the Code and ensure that they are treated properly.

Some key points for everyone

A breach of this Code of Conduct will constitute a valid ground for disciplinary action, including dismissal from employment for serious misconduct where appropriate. In some cases, the breach may also be a breach of some other law, and could result in prosecution.

Ignorance will not be accepted as an excuse. It is your responsibility to know and understand the Code. If you are in any doubt as to appropriate conduct, you should ask the Finance & Administration Manager or the Managing Director

You have a duty to report any breach of this Code, or where in good faith you suspect a breach of the Code. It is not acceptable to turn a blind eye to others breaching the Code of Conduct.

Any reported breach will be investigated: some may be formally investigated.

Any retaliation or threat of retaliation against any person for refusing to breach this Code, or for reporting in good faith a breach or suspected breach of the Code will not be tolerated, and is itself a breach of the Code. It may also be a breach of one of several laws that prohibit victimisation.

The Code does not form part of your contract of employment but is a reasonable and lawful direction to you.

Summary of our standards

Fundamental to its operations, and part of its commitment to excellent customer service and employee relations, Cold Forged Products No.1 Pty Ltd has the following values, which you must adopt at all times:

Value	Behaviour
Be safe	<ul style="list-style-type: none"> Ensuring that the safety of our employees, suppliers and customers is enhanced by all that we do Religiously follow and monitor safe work behaviours Identify opportunities or risks to create a safer environment
Act with Integrity	<ul style="list-style-type: none"> Speak up for what is right, especially when it feels difficult Expect and deliver the highest quality outcomes Make decisions and act as if your personal reputation were at stake We act with integrity and honesty at all times, demonstrating the very highest ethical and community standards. We comply with the letter and the spirit of all laws and regulations that apply to us. This will include our own policies as detailed in the QHSE portal. We respect, value and will maintain our professionalism and intellectual integrity. We respect confidentiality and will not misuse any information that has been entrusted to us.
Be the best we can	<ul style="list-style-type: none"> Find the best solution for each customer, not the easiest Go beyond the expected, respond to the ever changing environment Pre-empt what is required, see and act from the customer's perspective Follow and improve the process We respect Cold Forged Products No.1 Pty Ltd and will work to the best of our ability to maintain its reputation, image, profitability and success, treating its assets, resources and property with care and so as to minimise waste, and using our working time wisely.
Innovate	<ul style="list-style-type: none"> Dare to challenge the status quo and try new things Innovate, test and learn from failure Have an open mind to the possibilities in every idea Be brave, step outside your comfort zone
Work together	<ul style="list-style-type: none"> Collaborate and share relationships, ideas and knowledge with each other, customers and suppliers Seek and integrate a diverse range of perspective, people and ideas Give and ask for feedback to improve ourselves and others We respect and are courteous to all individuals, respecting their culture, beliefs and backgrounds, accepting them for who they are.

What do I do if I am uncertain about how I should act?

Cold Forged Products No.1 Pty Ltd recognises that there will be circumstances where it will be difficult to know what to do. No Code of Conduct can cover every possible action. For that reason, Cold Forged Products No.1 Pty Ltd has a number of detailed Policies, and you should refer to them for more detail about what is expected – refer the QHSE portal – Policies.

Secondly, when faced with a difficult question or situation, you should, after consulting the Code of Conduct and any relevant Policy, ask yourself these questions:

- Is my action or decision the right thing to do?
- Would my decision or action be one that would embarrass me if it became known to my family, friends, Cold Forged Products No.1 Pty Ltd or became known to the public generally by being on Television or in the Newspapers?
- Will this decision or action protect or enhance the reputation of Cold Forged Products No.1 Pty Ltd as an ethical company?

If the answer to any of these questions is “No”, you should stop and carefully consider the position again. Seek advice from the Finance & Administration Manager or the Managing Director.

Our standards in more detail

The following paragraphs set out further information about each of the areas of the Code. These are not exhaustive.

Integrity and honesty

We should always be honest, fair and truthful in all of our dealings. Those we deal with (be it customers, clients, suppliers, competitors, government agencies or the general public) expect absolute integrity from us. Honesty and integrity also applies to things we do not do, for example, if we see dishonesty in others and do not report it, this will reflect on your own honesty and integrity. We must never attempt to deceive or mislead others, either by our conduct or our silence. Cold Forged Products No.1 Pty Ltd expects proper behaviour at all times.

Some areas where this applies include (but are in no way restricted to):

- Making business decisions on honest grounds and uninfluenced by personal gain;
- Working at your best, producing good work, and being honest about your time and use of the assets of Cold Forged Products No.1 Pty Ltd;
- Not offering or accepting bribes or unauthorised gifts;
- Never mis-describing transactions or activities;
- Being honest with those utilising our products or services;

- Not obtaining a personal financial gain or advantage (other than your normal remuneration) from your work; and
- Reporting suspicious or dishonest conduct by others.

Integrity and honesty are expected, not just in your dealings with other people, but also in how you behave towards Cold Forged Products No.1 Pty Ltd and other employees. For example, theft or misuse of company assets will not be tolerated and may lead to termination of your employment, as may false complaints or accusations about fellow employees.

Complying with the law

Cold Forged Products No.1 Pty Ltd expects that you obey all laws and rules (including our own internal rules and policies – refer QHSE portal) that apply to you or Cold Forged Products No.1 Pty Ltd at all times, and does not encourage or condone “sharp practice” in seeking to evade the law. You must understand and follow the intention and the spirit of the laws that apply to you and your role.

While the law can be complex, ignorance of what the law requires is not an excuse or a defence. You are ultimately responsible for understanding what laws apply to the work that you do. If you have any doubt about what is allowed, you should ask [insert name and or title of person who can advise on ethical issues]. You must not at any time involve Cold Forged Products No.1 Pty Ltd in any illegal conduct.

That includes, for example, not paying proper taxation on our income, or making unjustified claims for deductions on our behalf. It means not offering or accepting bribes. Under no circumstances should you enter into any arrangement that involves the fixing of prices for goods or services.

Many of the policies (refer QHSE portal) that Cold Forged Products No.1 Pty Ltd has adopted reflect what the law requires, and you should be aware that breaching the policies may also be a breach of the law. An example of this is our policies around work health and safety, where a breach of our policies may also breach work health and safety legislation, and can result in prosecution. Similarly, a breach of our harassment policies may breach Anti-Discrimination legislation. Taking action against fellow employees because they have a workplace right is prohibited under the Fair Work Act 2009. Cold Forged Products No.1 Pty Ltd does not tolerate any breach of the law.

Professionalism and intellectual integrity

Cold Forged Products No.1 Pty Ltd respects, values and will maintain professionalism and intellectual integrity in all that we do. It expects its employees to behave professionally at all times, and to value and respect the intellectual rights of all.

Professional conduct requires that you maintain high standards of behaviour at all times and in all circumstances. This can relate to the way you dress ([insert link to Dress Policy]), the way you

speak to others (the public, clients, customers, other staff, your supervisors); the way you do your work (honestly, and to the best of your ability, using your time and company resources properly ([insert link to Company Property Policy])) and the way you treat others (see also Respecting Others, below).

Professional behaviour will require you to put the interests of Cold Forged Products No.1 Pty Ltd ahead of your own interests when it comes to work—it is not the mark of a professional to seek personal gain at the expense of your employer, for example, so it is not appropriate to seek bribes, gifts for doing your job, secret commissions or the like. You must not put yourself in a position of conflict of interest, whether this be placing business with a close friend or family member, working as a consultant, paid or unpaid, in a private capacity for some other company that deals with Cold Forged Products No.1 Pty Ltd, carrying on your own business (or setting up your own business) while still employed, or using inside information to make a personal gain. Some of that conduct is illegal as well as being unprofessional.

Cold Forged Products No.1 Pty Ltd also requires utmost intellectual integrity. This means different things in different contexts. For example, if your role requires significant thought and planning, you will do that to the best of your ability. If your work brings you into contact with intellectual property of Cold Forged Products No.1 Pty Ltd (confidential information, trade secrets, financial information, marketing plans, product details not publicly known, or commercial or technical information that is not known to the public, for example) then you must respect that information and not share it with anyone who is not entitled to access, and certainly not outside the company.

You must protect company information at all times. You must also respect the intellectual property of others. While we are competitive, and while we expect our employees to keep up with industry developments, it is never acceptable to take information that does not belong to us. You must not use any unethical, unlawful or improper means to obtain confidential information from a competitor, supplier, customer or other third party. You must not hire someone with the intention of asking for confidential information about their former employer.

Our intellectual integrity means you must not make misleading or deceptive comments about our own products or services, or about those of our competitors. We should be truthful, accurate and helpful in everything we say or write. We should not make promises we cannot deliver, and should honour the commitments we have undertaken.

Respecting others

We respect and are courteous to all individuals, respecting their culture, beliefs and backgrounds, accepting them for who they are. This applies to those in our workplace, but also to our conduct towards our customers and clients, our suppliers, and to the general public.

We will respect our colleagues and those with whom we come into contact and show a sensitivity to each other's feelings, cultures and individuality. We will welcome diversity, and will treat all with dignity, fairly and with respect. We will not disadvantage people with conditions or requirements that cannot be justified.

Cold Forged Products No.1 Pty Ltd has policies ([insert link to Policies on Flare platform]) about discrimination and sexual harassment, and you are expected to abide by these policies.

Behaviour which can be classed as:

- Harassment
- Bullying
- Unlawful discrimination
- Unfair treatment
- Vilification
- Violence
- Victimisation

will not be tolerated.

We do not accept gossiping; abusive language; intimidating, hostile or derogatory conduct or remarks; unwelcome sexual advances or other conduct (verbal or in writing, in email or text, or any other physical conduct) which is of a sexual nature.

We do not accept the use or display of written or graphic material that denigrates or shows hostility or aversion to others, particularly if it is motivated by characteristics such as gender, race, nationality, religious or philosophical beliefs.

We do not use management techniques or styles that are constantly harsh, cynical or humiliating.

Teamwork

We work as a team, respecting each other, and dealing fairly, honestly, and equitably with each other. This means that we will behave appropriately with each other, respecting each other's views and ensuring that we comply with the Code of Conduct (and associated policies) about respect, complying with the law, fair treatment, freedom from sexual harassment and freedom from violence.

It means more than just mere compliance with policies, laws and Codes, however. Being part of a team means looking out for each other, lending assistance when workloads are heavy, and ensuring that we ensure that our fellow workers are safe. We will speak up when we see breaches of policies.

We will cooperate with those in our team, and when we are in a supervisory position will not abuse our position by improper methods of management, or by favouritism or the like.

Confidentiality

We respect confidentiality and will not misuse any information that has been entrusted to us. On a daily basis, you will have access to information that is confidential. This may be information about the company—our finances, our costs, our profits, our products, etc—or about other workers—their personal details, for example—or about our clients, customers or suppliers. We will not use this information in an improper way.

We regard protection of confidential information as vital, and we expect you to respect and honour confidential information, whatever its nature. Unless specifically authorised to do so, you must not release any confidential information relating to any information or material you have acquired as a result of being associated with Cold Forged Products No.1 Pty Ltd. This obligation continues even after your employment ends.

From time to time, we are entrusted with confidential information belonging to others, given to us in the expectation that we will respect the confidentiality of that information. This information should be given the same respect as our confidential information. It must not be shared or disclosed.

We do not condone any person being recruited from a competitor and then being asked to breach their own obligations and disclose confidential information belonging to our competitors. We must respect the confidential information belonging to others and any failure to do so will be treated as misconduct and subject to disciplinary action.

Respecting Cold Forged Products No.1 Pty Ltd

We will respect Cold Forged Products No.1 Pty Ltd in the way that we work and the way we treat company assets.

In terms of our work, we will respect the company by ensuring that we work to the best of our ability, devoting all our working time to the task at hand. We will not produce second-rate work or products, and we will not use our time on personal tasks when we should be working for the company.

We will ensure that we behave consistently with our responsibility to conserve and protect the company assets. These include physical assets (raw materials, equipment, office supplies, and technology including computers, phones and software, for example) as well as its intellectual property such as confidential information and trade secrets. Confidential information can include matters such as our long term strategies, product plans, personnel records, sales and marketing plans, financial information, manufacturing methods, customer details and sales and supplier details.

We will also respect the company by making sure our public comments never disparage the company. We will not put any material on any of our personal social media pages (such as Twitter or Facebook) that comments on the company, and will not post photographs or other

material that identifies us as working for Cold Forged Products No.1 Pty Ltd. If you wear a uniform, this includes ensuring that there are no photographs of any person in company uniform on your sites.

We will never allow company property to be used for improper purposes, for example, we will never use it to access improper websites, or to view, download or store inappropriate text or images.

We will not put ourselves in a position where there is a conflict between our interests and those of Cold Forged Products No.1 Pty Ltd.

Further Questions?

You should realise that this Code is an overview of required conduct and is not meant to be the sole source of your obligations. If you have any doubts as to proper conduct, or questions about how the Code applies in any particular setting, you should seek advice from the Finance & Administration Manager or the Managing Director.



Andrew Carroll
Managing Director
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