

CODE OF CONDUCT POLICY

SIMPEC considers its employees have an obligation to observe certain behavioural standards in the conduct of its business. The Code of Conduct applies to staff while they are on leave, suspended from the workplace or outside of their 'usual' work environment e.g. training and conferences.

As the code forms part of the contract of employment, a breach of the code may entitle the employer to take disciplinary action or, if sufficiently serious, termination. This policy applies to all employees employed within SIMPEC. The Company believes that the full implementation of this policy will contribute to a professional and positive work culture with the absence of any form of unlawful or inappropriate behaviour. To achieve this goal, you are expected to:

- Comply with all SIMPEC policies, procedures and rules, regulations and contracts
- Be honest and fair and to act within the law in dealings with customers, clients, colleagues, all levels of management and the general public.
- Not bully, intimidate, harass or discriminate against other people
- Not attend the workplace under the influence of drugs or alcohol
- Observe health and safety requirements
- Not participate in sexual or other unlawful harassment or discrimination in the workplace
- Respect the ownership of all SIMPEC funds, equipment, supplies, books, records and property
- Not make unauthorised statements to the media about the SIMPEC's business (requests for media statements should be referred to the Managing Director).
- Immediately and fully disclose in writing to the employer any potential or actual conflicts of interest
- Not undertake, outside of working hours, a business or work which competes with the business of the employer or otherwise gives rise to a conflict of interest
- Not provide work, business or any other benefit on behalf of the employer to a business in which the employee or the employee's immediate or extended family, friends, partners or associates have a significant financial or personal interest
- Not assist or participate in the business of a competitor of the employer
- Not give or accept a benefit, gift or monetary payment in or in connection with any business maintained during employment with SIMPEC and after the termination of employment.
- To properly record and account for all transactions of SIMPEC by maintenance of the appropriate records and accounts and make no false or misleading entries into such records or accounts for any reason whatsoever.

Responsibility for establishing, implementing and periodic review of SIMPEC's Code of Conduct Policy rests with the Managing Director who has appointed a dedicated person for the development and maintenance of a documented Code of Conduct Policy which is reviewed annually for continuous improvement and compliance.



MARK DIMASI
MANAGING DIRECTOR
January 2020



DAVID DIMASI
DIRECTOR
January 2020