



# Code of Conduct and Ethics

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BetTube Corporation Ltd

ACN: 635 285 326

# The BetTube Group Code of Conduct and Ethics

2022 ver 1.9

Effective from: 19.01.2022

## PRELIMINARY

BetTube Corporation Ltd and its subsidiaries including IRPSX Pty Ltd (BetTube Group) are committed to conducting its business in a way that is open and accountable to shareholders and the wider marketplace. We believe our corporate governance practices as a proprietary company are of a high standard.

This code also applies to directors, officers and employees of the BetTube Group.

For the purpose of this document, "employees" includes IRPSX directors, full time and part time employees, contractors, casual and temporary staff as the case may be.

## PURPOSE OF THE CODE

The objective of the Code is to ensure that:

1. high standards of corporate and individual behaviour are observed by all BetTube Group employees in the context of their employment and activities with the BetTube Group;
2. employees are aware of their responsibilities to the BetTube Group under their contract of employment; and
3. all persons dealing with the BetTube Group whether it be directors, employees, shareholders, suppliers, clients or competitors can be guided by the stated values and policies of the BetTube Group.

## OBLIGATION TO COMPLY WITH CODE

Employees will adhere to the Code both in letter and in spirit. Adherence to the Code is a term of employment or appointment with the BetTube Group. Violation of the Code, or unethical behaviour which may affect the reputation of the BetTube Group, by any employee may mean that employee may be subject to termination of appointment or disciplinary action including termination of employment.

## PRIMARY OBLIGATIONS OF CODE

1. The BetTube Group and its employees must act with high standards of honesty, integrity, fairness and equity, and in a socially responsible manner in all aspects of their employment with the BetTube Group and dealings with third parties.
2. The BetTube Group and its employees must comply fully with the content and spirit of all laws and regulations which govern the operation of the BetTube Group, its business environment, and its employment practices.
3. Employees will not knowingly participate in any illegal or unethical activity.
4. Employees will not enter into any arrangement or participate in any activity that would conflict with the interests of the BetTube Group or prejudice the performance of professional duties.
5. Employees must actively promote compliance with laws, rules, regulations and this Code.
6. Employees shall not do anything which would be likely to negatively affect the BetTube Group's reputation.

## THE BETTUBE GROUP'S RESPONSIBILITIES TO SHAREHOLDERS

It is Management's task to achieve and the Board's role to oversee the delivery of shareholder value through the sustainable and efficient operation of the company, sound reporting and risk management practices. The mechanisms to achieve this include the compliance management structures, audit function, and the Board's oversight of strategic and business objectives.

## CARE AND DILIGENCE

The BetTube Group and its employees will exercise due care and diligence in the performance of their duties and responsibilities. This would include such activities as ensuring the accuracy of all decision making information, attending to detail in all aspects of work, being mindful of the sensitivities of others, protecting confidentiality and being courteous, open and honest.

The products and services provided by the BetTube Group will be of high quality. The BetTube Group and its employees will deliver these products and services to its clients in a timely and equitable manner, and give client satisfaction high priority. Where the quality of products and services provided by the BetTube Group is not satisfactory to its clients, the BetTube Group will take prompt remedial action.

## ANTI-BRIBERY AND CORRUPTION

Bribery is the offering, promising, giving, accepting or soliciting of an advantage as an inducement for action which is illegal, unethical or a breach of trust. Inducements can take the form of money, gifts, loans, fees, rewards or other advantages (taxes, services, donations, favours etc). Corruption is the abuse of entrusted power for private gain. Both bribery and corruption as defined by Transparency International.

The Code imposes the following rules on anti-bribery and corruption:

1. Employees must not engage in any form of bribery, either directly or indirectly.
2. Employees must not offer or give any gift or hospitality:
3. which could be regarded as illegal or improper, or which violates the recipient's policies or
4. to any public employee or government officials or representatives.
5. Employees may not accept any gift or hospitality from any business associates unless previously authorised by the CEO.
6. Charitable support and donations are acceptable (and indeed are encouraged), whether of knowledge, time, or direct financial contributions. However, employees must be careful to ensure that charitable contributions are not used as a scheme to conceal bribery.

## ANTI-SLAVERY AND HUMAN TRAFFICKING

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

The BetTube Group has a zero-tolerance approach to modern slavery.

The BetTube Group is committed to acting ethically and with integrity in all our business dealings and relationships, and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or our supply chains.

The BetTube Group is also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the *Modern Slavery Act 2015* (Cth).

The BetTube Group expects the same high standards from all of our consultants, suppliers and business partners, and we expect our consultants, suppliers and business partners to hold their own suppliers to the same high standards.

## CONFLICTS OF INTERESTS

### Employees

Where a conflict of interests arises or may arise, an employee must disclose the conflict to their supervisor. The supervisor will ensure that measures are put in place to protect parties affected by the conflict of interests from that conflict. Depending upon the nature and extent of the conflict, the measures taken to protect against conflict of interests may include ensuring that the conflicted or potentially conflicted employee does not participate in the relevant decision or activity, or disclosing the conflict to third parties affected by the conflict and ensuring that the conflicted or potentially conflicted employee is not the sole decision maker on the matter.

Where there is doubt the matter should be raised with Legal Risk Governance Compliance.

### Directors

Directors of the BetTube Group will be guided by the constitution of BetTube Corporation Ltd and will ensure that they abide by the provisions in the *Corporations Act 2001* (Cth) governing conflicts of interests. Depending upon the nature and extent of the conflict, the measures taken to protect against conflict of interests may include ensuring that the conflicted or potentially conflicted director does not participate in the relevant decision or activity, or disclosing the conflict to third parties affected by the conflict and ensuring that the conflicted or potentially conflicted director is not the sole decision maker on the matter.

Where there is doubt the matter should be raised with Legal Risk Governance Compliance.

## CONFIDENTIALITY

The Code imposes the following rules on confidentiality:

1. Employees will not take advantage of property, information or position, or opportunities arising from these, for personal gain or to compete with the BetTube Group.
2. Employees will not breach the BetTube Group's confidentiality or make use of confidential information obtained from the BetTube Group for personal gain or in a manner that would be detrimental to the BetTube Group.
3. Confidential information of the BetTube Group will not be used except in ways that are authorised by the BetTube Group or legally mandated. The same applies to confidential information belonging to third parties which an employee may obtain in the course of their duties.
4. All employees acknowledge this need for confidentiality by signing an Acknowledgement of Confidentiality upon commencement of employment and must not seek to obtain sensitive information that is not relevant to the performance of their duties.
5. The BetTube Group will respect the confidentiality of its employees.

## FAIR DEALING AND OTHER LAWS

Fair dealing requires compliance with trade practices and consumer protection laws.

The BetTube Group and its employees will comply with the content and spirit of all relevant laws and regulations concerning employment, such as anti-discrimination, equality of employment, health and safety. The BetTube Group will endeavour to ensure that all employees are treated fairly, equitably, and honestly.

## USE OF COMPANY ASSETS

The BetTube Group's assets must be acquired, maintained and used in an efficient manner and for legitimate business purposes.

## PRIVACY

BetTube Group's Privacy Policy regulates the handling of any personal information that the BetTube Group collects. It contains detailed information on the BetTube Group's functions and activities, and privacy issues and its privacy policy provisions. A copy of the policy is available [here](#) and on our website <https://www.betright.com.au/>

## MONITORING AND REPORTING VIOLATIONS

Legal Risk Governance Compliance monitors compliance with this Code.

Employees are required to report violations of the Code using conflict escalation procedures. The procedures provide for a staged escalation and provide ultimately for the CEO to become involved.

The policy underlying the procedures is to ensure employees are not disadvantaged in any way for reporting violations of the Code or other unethical conduct, that the matter is dealt with promptly and fairly and that the procedures are not used maliciously or mischievously.