

# Ethical Behaviour Policy

## 1. Scope

- 1.1 This policy applies to all Pacific Edge (“Pacific Edge”) employees and contractors (collectively “Workers”). Some aspects of this policy will only apply to employees. Where the policy applies to both contractors and employees, they will be collectively referred to as Workers.

## 2. Introduction and purpose

- 1.2 This policy sets the standards by which Pacific Edge Workers are expected to conduct themselves in their work life.

### 1.3 General principles of this policy are:

- a. This policy does not attempt to provide a complete list of acceptable or non-acceptable behaviours but provide a framework to facilitate decisions that are consistent with Pacific Edge’s values, business goals, legal and policy obligations, thereby enhancing performance outcomes.
- b. All Pacific Edge Workers will be courteous, honest, fair, timely and ethical in their dealings with one another, customers, suppliers and other external parties;
- c. That services, benefits, opportunities and facilities provided by Pacific Edge will be offered without discrimination, as defined in this policy.
- d. Pacific Edge is committed to ensuring the right to institute or participate in any process under this policy and to resolving any complaint in a timely and confidential manner.
- e. Unethical behavior includes, but is not limited to, sexual harassment, racial harassment, discrimination, personal harassment and bullying, the abuse of supervisory authority and failing to declare or manage a conflict of interest. This kind of conduct is described below.
- f. All Workers are expected to work in accordance with these standards of ethical and professional conduct. Failure to follow these standards of ethical and professional conduct will result in appropriate management practices being

invoked, which may include disciplinary action up to summary dismissal or termination of contract for a contractor.

## Core Principles

### 3. **Compliance with laws**

- 3.1 Pacific Edge Workers must ensure they are familiar with all statutory and other official requirements and restrictions which relate to their roles and responsibilities at Pacific Edge. Pacific Edge have policies and procedures in place to ensure employees are aware of the legislation and their responsibilities in complying with these laws and regulations. Employees are required to undertake training on legal obligations and policies as required. Contractors should ensure they have adequate training in regards to their legal obligations.
- 3.2 All Managers, Employees, Directors and representatives of the Company must actively look to increase their awareness of the law that affects the business and their specific areas of responsibility.

### 4. **Confidentiality**

- 4.1 The customers and suppliers of Pacific Edge, and other individuals and organisations with which it has business or other relationships, are entitled to expect that their dealings and information will be treated with appropriate confidentiality and security.
- 4.2 Workers must ensure that there are no deliberate or unintentional releases of commercially sensitive information including any information which could impact the Company's compliance with NZX listing rules. All information should be kept confidential and secure.

### 5. **Conflicts of interest**

- 5.1 There is a conflict of interest when the interests of a Worker or of a Worker's close family members or associates, interfere with (or appear to interfere with) the interests of Pacific Edge or might influence (or appear to influence) the Worker's decisions or actions.
- 5.2 Employees are expected to act in the best interests of Pacific Edge at all times.
- 5.3 Unless they have the specific consent of Pacific Edge, employees must not:
  - a. engage in any paid or unpaid activity which would compete with the interests of Pacific Edge;
  - b. engage in any paid or unpaid activity which would unreasonably compromise their ability to carry out the requirements and responsibilities of their employment with Pacific Edge; or

- c. support a political party or similar organisation, except in a personal and private capacity.
- 5.4 If an employee knows or is concerned that they may have a conflict of interest, they are to bring this to the attention of a member of the Executive Leadership Team immediately.
- 5.5 If a contractor knows or is concerned that they may have a conflict of interest, they must disclose this to Pacific Edge immediately.

## 6. **Discrimination and Harassment**

- 6.1 The Company's policies and procedures are designed to ensure fair practices and to extend Equal Employment Opportunities to all individuals. This policy applies also to all of the people that we deal with, each and every day including, for example, our work colleagues, our customers and our suppliers. Pacific Edge is committed to ensuring that all Workers and people who do business with the Company enjoy a workplace and work relationship free from discrimination, harassment and victimisation.
- 6.2 Discrimination, harassment or victimisation on the grounds of age, colour, disability, employment status, ethnic or national origin, family status, political opinion, race, religious or ethnic belief, sex or sexual orientation is against the law and will not be tolerated by the Company. If an employee believes they are or have been subject to any such conduct, they should notify their Manager or Pacific Edge's external Human Resources providers. If the Worker is a contractor, they should contact the appropriate Manager at Pacific Edge.

## 7. **Gifts and personal benefits**

- 7.1 Workers must not solicit or accept gifts or personal benefits from any individual or organisation which has or seeks to have business with Pacific Edge, or from any individual or organisation, if the acceptance of the gift or personal benefit could compromise or influence, or be perceived to compromise or influence, any decision or action of Pacific Edge.
- 7.2 An exception may be made in the case of gifts or personal benefits of a minor nature and minor value which are intended to recognise an existing relationship between the external party and Pacific Edge and/or the Worker. In such cases, however, the Worker must report the receipt of the gift or personal benefit to his or her Manager, if the Worker is an employee, or to the appropriate Manager at Pacific Edge if the Worker is a contractor. If the Worker is unsure whether or not they should accept a gift, they should discuss this with Pacific Edge before accepting the gift.

## 8. **Internet and email**

- 8.1 Access to the internet and email is provided as a business tool to assist Workers in their work. Users of the internet and email are expected to manage the use of these tools in a professional manner following the same standards of conduct as would be expected in normal business. Inappropriate use of the Internet or email on company systems or equipment is a serious breach of policy and could attract disciplinary action including summary dismissal, or termination of contract for a contractor.

## 9. **Use of Property and Information**

- 9.1 Workers must take care to ensure that they use the property and information of Pacific Edge only for lawful purposes that are specifically or implicitly authorised by the Company.
- 9.2 At all times, Workers must use such property and information with due care and diligence, and protect them as far as possible from loss, damage, misuse, waste or theft.

## 10. **Delegated Authority**

- 10.1 The Pacific Edge Board of Directors delegates the authority of managing the business and affairs to the CEO. The CEO in turn delegates to other levels of management certain rights to make operational and financial decisions within defined limits. The rules that govern this system are the Delegated Authority framework.

## 11. **Roles and responsibilities**

### 11.1 **CEO and Executive Leadership Team**

Support the adoption of and adherence to this policy and underlying core policies.

### 11.2 **Managers**

Familiarise with this policy, compliance responsibilities, implementation of procedures and processes to ensure compliance. Reporting compliance issues or incident mechanism through normal HR channels.

### 11.3 **Human Resources**

Respond to alleged breaches of this policy or Human Resources functional policies and direct investigation resources, training or disciplinary as required.

### 11.4 **All Workers**

Awareness of Pacific Edge's compliance framework, processes and tools. Ensuring adherence to this policy.

## 12. Reporting Concerns

- 12.1 Workers should report any breach of this code or any other policy immediately when they become aware of the breach. Employees should report to their Manager, contractors should speak with the appropriate Manager at Pacific Edge.
- 12.2 Any failure to abide by this policy may lead to disciplinary action which, in serious or repeated cases, could include dismissal or termination of contract for a contractor.
- 12.3 The Company expects and assumes that any report of breach of this code is made in good faith, is truthful and can be substantiated.

## 13. External Human Resources Provider

- 13.1 Pacific Edge's external Human Resources provider is:
  - a. Anderson Lloyd  
Malcolm Couling (Senior Associate)  
DDI: 03 471 5495  
Email: malcolm.couling@al.nz

This Policy should be read in conjunction with:

- Speak Up Policy
- Protected Disclosures Policy
- Protected Disclosures Act 2000
- Anti-Discrimination & Equal Employment Opportunity Policy

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