



COMPANY POLICY

Corporate Code of Conduct

LIT-POL-007

Month Year Feb-26 **Revision Code** Rev 05 **Approved by** Board of Directors

Controlled Document Approved for Distribution

Revision Code	Revision Date	Name	Position	Signature	Next Review Date
Rev 05	02-Feb-26	Board	Board	Board	1-Feb-28

1. PURPOSE

The purpose of the policy is to affirm the Livium Group's belief in responsible social and ethical behaviour from all employees and clarify the standards of behaviour expected of employees of the Livium Group.

This Code also supports the Group's legal obligations to prevent psychological harm in the workplace. Under Victorian Occupational Health and safety (Psychological Health) Regulations 2025 and Model Health and Safety legislation in Queensland, Western Australia and South Australia, behaviours covered by this Code, including how we treat colleagues, manage work, and create workplace culture, directly impact psychological health and safety. Adherence to this Code is essential for maintaining a psychologically safe workplace and preventing psychosocial hazards such as bullying, harassment, and poor workplace relationships.

2. APPLICATION

This policy applies to every employee and contractor (in this policy every reference to an employee is also a reference to a contractor) of the Group.

3. DEFINITIONS

The Group refers to Livium Ltd (ACN 126 129 413) and its subsidiaries.

4. RESPONSIBILITIES

It is the responsibility of all employees to comply with this policy.

All employees have an obligation and duty of care to:

- *comply with prevailing community standards of equity, justice, fairness and compassion in dealing with others within and beyond the Group.*
- *perform duties in a responsible and professional manner, with due regard for and compliance with Group policies and other legal requirements and obligations.*
- *exert responsible stewardship of Group resources.*
- *promote and protect the Group's reputation in the wider community; and*
- *act appropriately when a conflict arises between our self-interest and our duty to the Group.*

4.1 Personal conduct

All employees are expected to:

- *treat everyone with courtesy, respect, kindness, consideration, and sensitivity to their rights.*
- *refrain from all forms of bullying, harassment and discrimination based on gender, race, religious belief, political affiliation, pregnancy, disability, sexual orientation or illness.*
- *always act honestly, in good faith, and respectful of the trust placed in employees.*
- *respect everyone's rights to privacy and keep personal information in confidence.*
- *consider the impact of decisions and behaviour on the well-being of others.*
- *report concerns about risks and hazards both physical and psychosocial to your manager or People & Culture so they can be addressed proactively.*
- *must not consume, possess or be impaired by drugs and alcohol at the workplace, or, away from the workplace, whilst carrying out work for the Group or in vehicles or forklifts owned or leased by the Group.*
- *refrain from acting in any way that would unfairly harm the reputation and career prospects of other employees.*
- *refrain from allowing personal relationships to affect professional relationships; and*
- *seek advice from an appropriate manager where a colleague's behaviour is perceived to be in breach of the Code, and report any suspected corrupt, criminal or unethical conduct to their Manager or MD/CEO.*

4.2 Professional conduct

All employees are expected to:

- *perform duties diligently, impartially, conscientiously, with integrity, and to the best of their ability.*

- take responsibility for the health and safety for both physical and psychosocial of themselves and all the Group's employees when carrying out duties.
- adhere to the Personal Protective Equipment (PPE) requirements and dress appropriately to carry out the requirements of the role.
- comply with the Group's ICT policies and all laws relating to copyright, anti-discrimination, defamation, harassment, misuse of information and criminal activities when using the Group's ICT systems and devices.
- keep up to date with advances and changes in the body of knowledge and the professional and ethical standards relevant to the Group's areas of expertise.
- strive to always achieve the highest product, service and professional standards.
- understand and comply with any relevant legislative, industrial or administrative requirements including observance and application of the Discrimination, Harassment and Bullying policy.
- comply with the principles of environmental responsibility.
- foster teamwork and collegiality among all employees and always give due credit to the contributions of others.
- maintain adequate documentation to support any decisions made.
- take no improper advantage of any official information gained during employment.
- only provide or accept gifts with the prior approval of management on the condition that it is not with the intention or prospect of affecting a business decision of the recipient; and
- refrain from allowing personal political views and/or affiliations or other personal interests to influence the performance of duties or exercise of responsibilities.

4.3 Stewardship of the Group's resources

All employees are expected to:

- use the Group's technical and physical resources properly, responsibly and for legitimate purposes only.
- seek permission before using the Group's property for personal purposes.
- use resources in a manner that causes no harm to the community or environment.
- strive to always obtain value for the Group's money spent and avoid waste and extravagance in the use of the Group's resources.
- secure the Group's property against theft, fraud or damage; and
- maintain the integrity and security of all the Group's intellectual property and commercial and other information.

4.4 Protection and Promotion of Group Reputation

All employees are expected to:

- promote the Group wherever possible in our professional dealings with others.
- refrain from representing themselves as spokespersons or acting for or on behalf of the Group unless authorised to do so (and when in doubt seek advice from their direct supervisor, or supervisor's manager).
- express that they are posting on behalf of themselves and not the Group when posting company-related content on social media. The opinions they express should be respectful of the Group. If an employee has a comment or concern about the Group, it's best they raise it with their manager or People & Culture rather than posting it online; and
- refrain from engaging in any activity that may compromise the Group's integrity and reputation.

4.5 Dealing with Conflicts of Interest

All employees are expected to:

- ensure that their financial and other interests and actions do not conflict or seem to conflict with the obligations and requirements of our Group position – or advance their own interests over those of the Group.
- avoid any financial or other interest or undertaking that could directly or indirectly, compromise the performance of their duties.
- take all suitable measures to avoid or deal appropriately with any situation in which they may have or been seen to have a conflict arising out of their relationship with others within or beyond the Group.
- notify their direct report or their manager, as appropriate, of the existence of an actual or potential conflict of interest; and
- declare their relationship when participating in decisions affecting another person with whom they have a personal relationship.

5. BREACH OF THIS POLICY

Employees whose conduct falls below the standards outlined in the Code will be counselled accordingly and/or disciplined in accordance with disciplinary procedure.

6. POLICY REVIEW

The Board will review this policy at least annually. The Board must approve any amendments made to the policy as a result of any review.

