

Code of Conduct Policy

Approved 16/9/2019

.aUDA
.AU DOMAIN ADMINISTRATION LTD

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Purpose of this Policy

This policy aims to:

- To provide guidance as to the minimum standard of personal conduct and professional behaviour expected of all auDA directors, employees, consultants and contractors
- Support the Company's business reputation and corporate image within the community; and
- Make employees aware of the consequences if they breach the policy

People who agree to work for the company, agree to abide by and honor the spirit of this Code.

The Code sits alongside and does not replace the rights and obligations of employees of the company under contract, common and statute law.

It provides guiding principles to help everyone make decisions about what is acceptable and unacceptable behaviour, particularly where judgment is required in handling situations where the right course of action may be unclear or ambiguous.

Application of the Policy

All employees must comply with the Code of Conduct. A reference to '**employee**' for the purpose of this policy, includes all auDA directors, employees, consultants and contractors.

All employees must comply with the Code of Conduct. A reference to 'employees' includes temporary employees, contractors and Company directors.

The Code of Conduct applies to all business activities with suppliers and contractors.

Responsibility lies with every person covered by the Code of Conduct to conduct themselves in accordance with the Code of Conduct.

Guiding principles

There are four guiding principles underpinning the Code:

1. Respect for the law and the company's policies, guidelines and procedures
2. Fair and equitable treatment of all people
3. Maintaining the highest level of personal and professional behaviour
4. Exercising care and due diligence

1. Respect for the law and the Company's policies, guidelines and procedures

All employees are expected to:

- act in accordance with auDA's goals, purpose, values, policies, guidelines and procedures

- understand and comply with the relevant Federal and State laws
- respond appropriately to any reasonable and lawful directions by persons who are authorised to give those directions

2. Fair and equitable treatment of all people

All employees must:

- treat everyone with respect and dignity
- treat everyone with fairness, courtesy, equity, patience and tolerance
- be respectful of differences and not engage in any form of discriminatory activities
- not harass, bully, insult or intimidate anyone
- not act in a way that would unfairly damage the reputation of the company or any of its directors, and employees or anyone who has dealings with the company.

3. Maintaining the highest level of personal and professional behaviour

All employees must ensure that they:

- maintain the level of trust of other employees, by avoiding actual or perceived conflicts of interest and notifying their direct report if they believe an actual or perceived conflict has or will arise
- do not accept gifts or other inducements, whether financial or otherwise
- do not undertake work with a competitor or a supplier without first obtaining written approval
- do not attribute opinions and comments taken to be made on behalf of the company that has not been authorised by the company
- do not knowingly make or support statements that are misleading, untrue or defamatory

4. Exercising care and due diligence

All employees are expected to:

- carry out their duties and responsibilities in a professional, responsible and conscientious manner
- make decisions appropriate and reasonable to the circumstances
- report genuinely suspected dangerous or fraudulent actions by employees or anyone else involved with the Company

- take reasonable steps to ensure adequate protection of confidential and personal information
- always act in a manner which supports and promotes the Company
- use Company property responsibly

Consequences for a Breach of this Policy

auDA takes its commitment to this Code very seriously and any breach of this Code may lead to employees being disciplined in accordance with the employee's terms of engagement, including dismissal. In addition, any breaches which also break the law may result in personal liability for those responsible for the breach.

What to do if a breach occurs

If an employee has any concerns about any genuine behaviour or situation which may be in breach this Code or potentially breaches the law they have a number of options available to resolve the breach. They may:

1. discuss it with the person or persons responsible for the breach
2. discuss it with the Company's CEO
3. report it to the Chief Executive or Governance Chair
4. and
5. Specifically, for Directors notification/discussion should be directed to the Board Chair and/or Governance Committee Chair

If you wish to report a breach or potential breach anonymously, you may provide a detailed report to the Company Secretary, by post or email.

Subject to the option preferred, appropriate action in response to the report will be taken.

Process for making a complaint

Employees making complaints will be:

- provided with information about our complaint handling process
- provided with multiple and accessible ways to make complaints
- listened to, treated with respect and actively involved in the complaints process where possible and appropriate; and
- provided with reasons for the decision/outcome and any options for redress or review

Review of this Policy

The Company Secretary will be responsible for keeping this policy up-to-date. A formal review of this policy will occur every two years, or earlier as a result of changes in law or regulation.

This policy will be submitted for review by the Governance Committee of auDA, who will make recommendations to the Board. The Board is responsible for approving this Policy.

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Policy History:

Policy Version: 1.0

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Review Date: September 2021