

# Code of Conduct

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The Code of Conduct applies to all employees of RFI, including permanent full time and part time employees and casuals. The Code of Conduct provides a framework of principles for conducting business and dealing with customers, colleagues and other stakeholders which are to:

- Act with integrity and professionalism and be scrupulous in proper use of Company information, funds, equipment, and facilities.
- Exercise fairness, equity, proper courtesy, consideration, and sensitivity in dealing with customers, employees, and other stakeholders.
- Avoid real or apparent conflict of interests.

## Responsibilities

Employees are required to:

- Promote the interests of RFI.
- Respect co-workers, customers, suppliers, and service providers.
- Perform their duties with skill, honesty, care, and diligence, using authority in a fair and equitable manner.
- Comply with the spirit as well as the letter of the codes of conduct applying to the professions of individual employees.
- Abide by policies and procedures, instructions and lawful directions that relate to their employment and duties.

## Compliance with Laws, Rules and Regulations

In the course of their duties, employees must:

- Comply with all relevant laws, rules and regulations of the States and countries in which we operate.
- Be aware of, and adhere to, company policies, especially those relating to health and safety, equal opportunity, bullying and harassment, privacy, trade practices and continuous disclosure.

## Conflict of Interest

Employees must avoid:

- Any personal benefits, financial or other interest which may conflict with their duties and responsibilities to RFI.
- Any interest which may constitute a conflict of interest must be promptly disclosed to an appropriate senior manager.
- Accepting any external appointment, such as a board appointment (other than to the board of a non- trading family company), working for another organisation, or conducting a business that detracts from their ability to fulfil their specified role with RFI, is not permitted without the written permission of the Chief Executive Officer (CEO), or in the case of the CEO, of the Chairman.

## Confidentiality

- Employees must not use or disclose information obtained through their employment other than in the proper course of their duties.
- Any intellectual property developed by an employee during, or as a result of their employment with RFI, is the sole property of RFI.



- Information obtained in the course of employment must not be used to obtain financial reward or other benefit, or to take advantage of another person.
- Employees must comply strictly with the privacy principles of the Privacy Act.

#### **Discrimination and Harassment**

- Diversity of the Company's employees is a tremendous asset. We have zero tolerance of any behaviour that is intentionally discriminatory, bullying or harassing to another employee.
- We are committed to providing equal opportunity in all aspects of employment including recruitment, selection, reward, promotion, and development.
- All employees must comply with the Discrimination, Bullying and Harassment Policies.

#### **Safety**

- Employees must observe and comply with all safety practices and procedures in place at RFI to maintain a safe workplace.
- Protective equipment supplied by RFI must be always used correctly and equipment used in a safe manner and maintained in a safe operating condition.

#### **Environment**

Employees must comply with relevant environmental legislation and promote environmental awareness.

#### **Company Property**

- Company property, funds, facilities, and services must be used only for authorised purposes.
- Unless governed by law or otherwise agreed in writing, any intellectual property developed by an employee during or as a result of his or her employment by RFI is the sole property of RFI.

#### **Public Statement**

The Company's relationships with the media are conducted exclusively by the CEO or as delegated by the Board.

#### **Competition**

- We seek to outperform our competition fairly and honestly. We seek competitive advantages through superior performance never through unethical or illegal business practices.
- Stealing proprietary information, possessing trade secret information that was obtained without the owner's consent is prohibited.

#### **Gifts and Entertainment**

- Employees, from time to time, may entertain or are entertained and give or receive gifts in the course of their duties.
- Gifts should never be offered or accepted in circumstances where the outcome of a transaction may be influenced by the gift or give rise to the perception that the transaction may be influenced by the gift.
- Employees involved in a tendering process must refrain from actions which may give rise to an expectation of some favoured treatment from or by any tendering party.
- Under no circumstances must employees offer or accept money.
- Gifts and entertainment must not be above a size that could represent a bribe or secret commission.
- Bribing, or attempting to bribe a public official (foreign or local) is a serious crime under Australian law with harsh penalties. Employees must ensure they do not participate in any such activities.



- Invitations where travel and accommodation is involved must be authorised by a senior executive, or in the case of senior executives, by the CEO, or in the case of the CEO, by the Board.

#### **Breaches of the Code**

- Employees have a duty to observe the code and ensure that no breaches occur. Breaches require immediate attention and employees have a duty to report known or suspected breaches of the code.
- Any employee, who in good faith, makes a complaint or disclosure about an alleged breach of the code, and follows the reporting procedure outlined below, will not be disadvantaged, or prejudiced in the making of such a complaint or disclosure. All reports will be treated as confidential.
- A complaint or disclosure about an alleged breach of the Code should be in writing and contain details about the date, time and nature of the alleged breach and include any available supporting material.
- The allegation should be made to the employee's immediate supervisor, or if the employee believes the immediate supervisor may be implicated, to a senior executive or to the CEO.
- The person to whom the allegation is made should undertake a prompt and thorough investigation and determine whether any action is required.
- The employee will be informed of the outcome of the investigation.
- If unsatisfied with the outcome of the investigation, the employee may refer the matter to a senior executive or the CEO.
- Employees may at any time discuss a matter or seek advice on how to proceed with a matter, from the Human Resources Manager or any other senior executive.

#### **Conclusion**

If an employee has doubts about any aspect of this code, he or she must seek clarification from their manager or the Human Resources Manager.



