

Sunland Group

Code of Conduct and
Anti-Bribery and Corruption
Policy

Sunland Group

ESTABLISHED

1983

1. CODE OF CONDUCT AND ANTI-BRIBERY AND CORRUPTION POLICY

1.1 Introduction

At the core of the Sunland's values is to act with integrity and unity, and to establish a high level of trust and honesty through consultation with all stakeholders of the Group. In doing so employees are respecting the rights and interests of those with which we deal, and in the communities in which we operate. Other values that guide our behaviour are: Enduring Relationships – working with people and organisations that share our values; Workplace Balance – respecting each other's needs outside work with family and friends and recognise the diverse contributions to improve our work and community environments; Excellence – passionately striving to be the best in everything we do. These values combine to achieve Sunland's objective of creating vibrant communities whilst delivering desired returns on shareholders' funds.

Sunland's policies are reviewed periodically and advised to directors and employees should there be any material changes or updates.

1.2 Purpose of Code

The Sunland Code of Conduct forms part of the Sunland Employee Handbook which in turn forms part of the terms of employment. The Sunland Code of Conduct and company policies are designed to:

- reflect Sunland's values; and
- assist all employees and to understand their responsibilities and obligations.

This Code of Conduct applies to all directors, employees whether full time, part-time or casual and including fixed term contract, work experience and temporary employees.

The Code of Conduct covers various areas of professional conduct and details the minimum standards of behaviour expected of all employees.

Sunland is committed to high standards of integrity, professionalism and accountability and the Code of Conduct reflects this commitment. All employees are expected to carry out their duties with efficiency, integrity and impartiality, and to strive to ensure that a high standard of service is delivered.

1.3 Performance of Duties

In the performance of their duties, employees must:

- behave in accordance with the Sunland values of Integrity and Trust, Enduring Relationships, Balance and Excellence;
- treat others with courtesy;
- apply themselves diligently, impartially and responsively, to the best of their ability;
- comply with any relevant legislative or administrative requirements;
- be able to justify any decisions made;
- not take improper advantage of any information gained in the course of employment;
- observe relevant work health and safety requirements and bring to the attention of Management any situation that is, or is likely to be, a health or safety hazard;
- act in a high quality, professional manner in all communications and interactions with

customers, colleagues, contractors and suppliers;

- always act in the best interests of Sunland;
- understand that their actions and conduct, both inside and outside of the work environment, may impact upon the reputation of Sunland and therefore must ensure they conduct themselves appropriately at all times to protect the reputation of Sunland;
- give their time and attention to the business of Sunland during their hours of work or when providing services to Sunland; and
- be punctual with regard to their working hours. They must attend work on time; return from breaks without delay and not waste time during work hours - including but not limited to excessive personal telephone calls, emails, etc. and browsing the internet for non-work related means.

1.4 Respect for Persons

Employees must:

- (a) treat other employees, contractors, clients, customers and suppliers with respect;
- (b) be tolerant of the ethical, cultural and/or religious differences and views of other employees, contractors, customers or suppliers;
- (c) not discriminate against colleagues, customers, contractors or suppliers with regard to their race, gender, religion, abilities, needs or beliefs. Compliance with Sunland's Discrimination, Harassment and Workplace Bullying Policy is expected at all times;
- (d) encourage and support their peers, accept each employee or contractor as a unique individual and act in a manner that promotes a productive and harmonious working environment; and
- (e) ensure language and communications with other employees, contractors, customers and suppliers are professional, polite, courteous and appropriate at all times. Inappropriate language will not be tolerated.

1.5 Appropriate Workplace Behaviour

Employees should ensure that they do not conduct themselves in a way that places themselves, another employee or contractor, or anyone on the premises of Sunland in a situation which could expose them to risk to their health, safety or welfare.

Employees must comply with all Sunland's policies and procedures, including but not limited to the:

- (a) Anti-Bribery and Corruption Policy
- (b) Workplace Bullying Policy;
- (c) Discrimination and Harassment Policy;
- (d) Email, Internet and Social Media Usage Policy;
- (e) Work Health & Safety Policy; and
- (f) Drug & Alcohol Policy.

The Anti-bribery and Corruption Policy is included in this document and is published on the Company's web site. Other policies and procedures are provided in the Sunland Employee Handbook and are available through the Company's internal web site "The Hub".

Employees who supervise others or are in a senior position have a responsibility to set good examples for others through their own behaviour, especially in regard to implementing the Code of Conduct by complying with it and ensuring employees and contractors comply with it. They must at all times treat employees, contractors, customers and suppliers fairly, equitably and consistently and maintain open and honest communication.

Employees must not unduly obstruct the actions of others in the implementation of Sunland's policies, procedures and decisions.

Employees must not take advantage of their position in Sunland to improperly influence the performance of the duties or functions of other employees or contractors.

1.6 Dishonesty or Fraud

Employees must not conduct themselves in any way that is dishonest or fraudulent when performing duties or providing services to/for Sunland. Employees must report any evidence of fraud or dishonesty to Management without delay.

Examples of fraud or dishonest conduct include but are not limited to:

- stealing;
- gaining a personal benefit by not revealing a conflict of interest;
- lacking impartiality;
- misuse of company information;
- misappropriation of company funds;
- falsifying timesheets;
- accepting money or other benefits in exchange for providing a favour; and
- undertaking work for a personal cash benefit instead of undertaking the work as an employee or contractor of Sunland.

Sunland does not take any responsibility for the loss or theft of personal belongings such as money or personal property of its employees.

1.7 Use of Alcohol & Drugs

Sunland is committed to keeping the workplace drug and alcohol free to maintain trust and confidence of client and customers and the health and safety of employees and contractors.

The use of drugs and alcohol adversely affects the productivity, attendance and on-the-job safety of employees and contractors.

Employees and contractors must not:

- at any time allow the consumption of alcohol or drugs to adversely affect their work performance, duties, and conduct at work functions;
- consume alcohol while on the premises without permission from Management; or
- possess and/or consume any illegal drugs while on the premises, or while attending any functions as a representative of Sunland.

Without limiting the above, all employees and contractors must comply with Sunland's Drug and Alcohol Policy.

1.8 Work Health & Safety

Sunland is committed to providing a safe and healthy workplace for all employees. Sunland will, as far as reasonably practicable, ensure the health and safety of employees and contractors while at work.

Making the workplace a safe and healthy one is a partnership between the employees, contractors and Sunland. Maintaining a safe work environment requires everyone's continuous co-operation. Employees are expected to ensure their own health and safety, and the health and safety of others in the workplace and comply with Sunland's Work Health & Safety Policy.

1.9 Discrimination, Harassment & Workplace Bullying

Sunland's core values include:

- integrity and trust which means being honest, constructive and ethical; and
- balance, that is, respecting each other's needs outside work and diverse contributions to improving Sunland.

As part of implementing these values, Sunland endeavours to prevent unlawful discrimination, harassment and workplace bullying at Sunland.

There are also legal rights and obligations created by relevant laws which affect Sunland, its employees, contractors and clients. Everyone has the legal right to freedom from unlawful discrimination, harassment and bullying at work.

Employees and contractors are required to abide by Sunland's Discrimination and Harassment Policy and the Workplace Bullying Policy.

1.10 Modern Slavery

Whilst Australia's culture, laws and standards of our society support the rights and freedom of the individuals within our community, Sunland recognises the risk of modern slavery and exploitation does exist within Australia. Practices that constitute modern slavery can include:

- human trafficking;
- slavery;
- servitude;
- forced labour;
- debt bondage;
- forced marriage; and
- the worst forms of child labour.

The Group has no tolerance for practices that do not respect the rights of individuals, including such practices from our suppliers. If an employee becomes aware of any practices within Sunland or with parties Sunland engages with, they must immediately report such activity to their manager and Managing Director.

1.11 Anti-Bribery and Corruption Policy

This policy is an important part of the Company's Code of Conduct and core values of the Company and the industry in which it operates. Serious criminal and civil penalties may be incurred, and reputational damage may be done if the Company or any of its directors or employees are involved in bribery or corruption. All directors and employees are prohibited in:

- Giving of bribes or other improper payments or benefits to public officials
- Providing payment of secret commissions to anybody acting in an agency or fiduciary capacity
- Donating money to any political party or candidate in the form of donations or to attend any paid event on behalf of Sunland, whether they be party affiliated or independent at a local, state or federal level
- Receiving gifts from customers and suppliers that may be construed to for a bribe or inducement for a particular action by the employee. The receipt of token gifts of gratitude, including entertainment and hospitality, may be accepted and must be reported to your Manager and Managing Director before the gift is retained or utilised by the employee

1.12 Consequences for Breach of This Code of Conduct and Sunland Policies

All employees should understand any breach of the Code of Conduct as well as matters canvassed in other policies and procedures in the Employee Handbook will be treated seriously and, where necessary, disciplinary action will be taken, including possible termination of employment. Breaches of any policies will be reported to the Managing Director and escalated to the Board of Directors where considered necessary.

Any frivolous or vexatious reports of alleged breaches of the Code of Conduct, or any policy or procedure, will not be tolerated and disciplinary action will be taken with regard to an employee up to and including termination of employment.

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