

Code of Conduct Policy

Envirosuite is committed to encouraging a safe, supportive, lawful and productive work environment. This can only happen when everyone follows established standards of conduct.

Our code of conduct plays a critical role in our success as a business, our ability to generate business value and assists us to abide by all relevant laws.

This document contains principles and standards of conduct which affirm our commitment to corporate responsibility.

This document is not meant to serve as a detailed account of our policies and procedures; therefore, it is important that our people are also aware of their responsibilities with respect to specific processes and contexts, and to raise any concerns with or ask any questions of their Manager or a member of the Senior Leadership Team.

This code of conduct applies to all our people at Envirosuite, in whatever capacity they are working with us (including the Board of Directors, employees, contractors or consultants). Each of us has a responsibility to act honestly, fairly and with integrity when representing Envirosuite.

If staff have a query about how this Code or the law applies to a situation that arises in their work or anything mentioned in this Code, or if they have questions about whether this Code has been complied with, they are encouraged to raise it with their Manager or a member of the Senior Leadership Team.

This Code is regularly reviewed and updated, and each Envirosuite worker is expected to understand and comply with it at all times. Failure to comply with the Code of Conduct may result in disciplinary action, including termination of employment.

HEALTH & SAFETY

Envirosuite is committed to providing as far as reasonably practicable, a healthy and safe working environment for all our people and visitors. Everyone's behaviour contributes to a safe and responsible workplace, including taking appropriate action to remove any danger to health and safety, if it is safe to do so, or raising the alarm about a danger to an appropriate person.

Wilfully or habitually violating health and safety procedures will not be tolerated.

EMPLOYMENT

Envirosuite prohibits discrimination on the basis of race, age, gender, national origin, religion, sexual orientation, political affiliation or on the basis of any personal characteristic protected by law.

Envirosuite will not tolerate coercion or intimidation in the workplace.

Envirosuite is committed to improving employment skills and competencies of its workers by regular performance reviews, and by offering relevant education, training and mentoring.

Sexual or any other harassment will not be tolerated, including threats, intimidation, bullying and subjecting individuals to ridicule or exclusion.

The consumption of alcohol by workers anywhere in the workplace during work hours is strictly prohibited (exceptions may be granted by the CEO, Regional Head or Business Unit Manager).

The consumption of prohibited substances in the workplace or during any work-related event or travel will not be tolerated.

Envirosuite is committed to respecting human rights and protecting the fundamental dignity of workers. This includes taking steps to ensure that there is no slavery, servitude, forced or compulsory human labour, human trafficking, child labour, debt bondage and deceptive recruiting for labour or any other form of modern slavery in any part of Envirosuite's business or its supply chains. Envirosuite expects its service providers, suppliers and contractors to share its commitment to act lawfully and ethically and to work to ensure that modern slavery is not taking place within their organisations or supply chains.

ENVIRONMENT

Envirosuite is committed to national, state and local environmental laws of the countries we reside, or undertake work in, and continually strives to reduce any adverse impact of its business on the environment.

CONFLICT OF INTEREST

Envirosuite workers must ensure that personal activities and interests (including both financial and non-financial interests, and activities and interests of family members and other personal acquaintances) do not conflict with their responsibilities to Envirosuite. Even the potential for, or appearance, of a conflict must be avoided. Conflicts of interest, or perceived conflicts of interest, must be entered on the company "conflicts of interest" register, which will be made available on the Intranet.

Some examples are:

- Outside work or employment
 - An outside business relationship with, or interest in, a supplier, client or competitor
 - A business relationship on behalf of Envirosuite with any person who is a relative or a personal friend, or with any company controlled by such a person
 - A position where you have influence or control over the job evaluation or compensation of any person who is a relative, a person you are in a relationship with or other personal acquaintance
 - Personal use or sharing of Envirosuite confidential information for profit, benefit or advantage, for example, buying or selling, or advising others to buy or sell Envirosuite or a client's shares on the basis of this information
 - An acceptance of personal benefits, such as something more than a modest gift, entertainment or accommodation, from a person or organisation dealing, or expecting to deal with Envirosuite in any type of business transaction.
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COMPETITION / ANTI-TRUST

Most jurisdictions in which Envirosuite operates have competition laws prohibiting unfair and anti-competitive conduct. There may be significant civil and criminal penalties imposed on both Envirosuite and the individuals involved in anti-competitive behaviour which, in summary, is any action or inaction that results in an unfair and unlawful advantage for one or more parties or which otherwise unlawfully restricts competition in the marketplace.

Some examples include:

- Disclosing to or seeking to exchange with competitors any commercially sensitive information such as price, contract negotiation status, capacity, costs, commercial strategies or plans, bidding intentions, clients and market share.
 - Engaging in misleading or deceptive conduct, or conduct that is likely to mislead or deceive, including making false representations (that is, knowingly making representations that are false or which the person making the representation knows is impossible or unlikely).
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BRIBERY AND CORRUPTION

Envirosuite workers shall not offer, promise, give, demand or accept any payment, gift, favour or undue advantage, whether directly or indirectly, to or from:

- A public official
- A political candidate, party or party official
- A community leader or other person in a position of public trust, or
- Any private sector employee (including a person who directs or works for a private sector enterprise in any capacity)

in order to obtain, retain or direct business or to secure any other improper advantage in the conduct of business.

GIFTS AND ENTERTAINMENT

Gifts and entertainment given and received as a reward or encouragement to someone outside of the Company for preferential treatment are not permitted.

In certain circumstances and in certain cultures, the giving and receiving of modest gifts and entertainment is acceptable. For example, a business meal to exchange information. However, consideration must be given to whether this may be interpreted as reward or encouragement for preferential treatment, and if likely to be interpreted this way, no gift or benefit should be given or received. All gifts offered or received greater than AU\$100 per person in value must be entered on the company gift register, which will be made available on the Intranet.

FAIR BUSINESS PRACTICES

All dealings, including with clients and third parties, must be honest, transparent and fair. Envirosuite conducts its services honestly and honourably and expects clients and suppliers to do the same. Envirosuite advice, strategic assistance and the methods imparted through our services shall take proper account of ethical considerations.

Envirosuite is committed to ensuring our products and services meet all relevant legal standards.

Envirosuite provides a fair evaluation and selection process to all prospective suppliers.

ENVIROSUITE PROPERTY

Staff shall not:

- Obtain, use or divert Envirosuite property or financial resource for personal use or benefit, or the use or benefit of a family member or personal acquaintance
- Alter or destroy Envirosuite property without proper authorisation, or
- Remove or use Envirosuite property or Envirosuite services without prior management approval.

ELECTRONIC RESOURCES

Electronic resources encompassing software, electronic communications (email and collaborative tools) and on line subscriptions and databases that are provided by Envirosuite must be used responsibly, appropriately and ethically. Envirosuite reserves the right to monitor all electronic content.

Inappropriate use includes:

- Use that relates to material, which is offensive, sexually explicit, defamatory, discriminatory, abusive, harassing or violent
- Knowingly causing any material to be used, copied or distributed in breach of confidentiality or copyright obligations
- Online gambling
- Engaging or assisting in unlawful activities
- Engaging in activities for the purposes of private profit
- Deleting or attempting to destroy electronic records which are, or are reasonably likely to be required in evidence in a legal proceeding or regulatory investigation, or
- Use that is likely to cause harm to Envirosuite.

Incidental personal use of Envirosuite electronic resources is allowed as long as it does not interfere with work duties.

Workers should be vigilant in their use of electronic resources to avoid contamination of Envirosuite's systems via spyware and viruses. If you suspect that the security of your device has been compromised, you should contact IT immediately. You can help avoid these risks by:

- avoiding suspicious websites and links
- refraining from downloading unauthorised software onto Envirosuite devices

CONFIDENTIAL INFORMATION

Envirosuite will not tolerate unauthorised disclosure of our Confidential Information.

It is important that, at all times during and after employment, workers keep confidential all confidential Information and use their best endeavours to prevent the disclosure of it to any person except:

- as required by law
- with Envirosuite's prior written consent or
- in the proper performance of duties while employed by Envirosuite, to our workers, agents or advisors who enter into a confidentiality agreement.

Staff shall not:

- use confidential Information for a purpose other than for Envirosuite benefit and
- make a copy or other record of Confidential Information, except in the proper performance of their duties while employed by Envirosuite.

'Confidential Information', for the purposes of this code of conduct, means all trade secrets and other information regarding Envirosuite affairs which becomes known to workers in circumstances where they know or ought to know that the information is to be treated as confidential and includes, without limitation, information that:

- Envirosuite indicates is confidential
- by its very nature, might reasonably be understood to have been disclosed to the worker in confidence; or would be of commercial value to a competitor
- relates to Envirosuite's affairs, including performance or profitability reports, budgets, margins and marketing strategies
- relates to Envirosuite's clients, including lists of clients and their requirements
- relates to trade secrets, know-how, manufacture or development processes used in relation to Envirosuite products or services
- is formulae, technical information, plans and product specifications
- is a quotation or a tender submitted or prepared for submission to clients or potential clients;
- is found in Envirosuite manuals, policies or procedures

except where that information is available to and known by the public otherwise than through wrongful acts.

Envirosuite is committed to maintaining the highest degree of integrity in all of our dealings with potential, current and past clients, both in terms of normal commercial confidentiality and the protection of all information received in the course of providing the business services concerned.

INSIDER TRADING

As a publicly listed company traded on the Australian Securities Exchange (ASX), we must also be aware that when sharing our confidential information, we may also be breaking insider trading laws.

Insider trading refers to the sharing of confidential information which may provide an unfair advantage in the buying or selling of shares or stocks. Sharing information about Envirosuite which is not already public, may lead to a breach of insider trading laws under the ASX Listing Rules and the Corporations Act.

All staff must comply with the company share trading policy, at all times. The Share Trading Policy is located in the Corporate Governance Charter located on the company website at: <https://cms.envirosuite.com/wp-content/uploads/Corporate-Governance-Charter.pdf>

INTELLECTUAL PROPERTY

Any and all interests in Intellectual Property Rights that workers develop as part of their work with Envirosuite automatically becomes Envirosuite's property.

Workers must disclose to Envirosuite any new or potential Intellectual Property Right promptly after it is brought into existence.

Intellectual property is certain types of intangible work or ideas which can be owned. Examples of such rights include:

- patents, which protects devices, methods, processes or substances, such as a new product or system (where that product or system works in an improved way over existing products or systems)
- copyright, which protects ideas and information, such as source code, websites and images

- trademarks, which protects signs, shapes and colours (or a combination of them) that distinguish Envirosuite goods or services, and
- design rights, which protects the overall appearance of a product via its visual features (shapes, patterns, lines or colours).

All employee obligations relating to Intellectual Property Rights continue after the termination of employment.

Intellectual Property Rights mean an invention, discovery, computer program, process, trademark, service mark, copyright work, design, patent, know-how or any other intellectual property right throughout the world that is:

- related to or connected with Envirosuite business or a product or service of Envirosuite, and
- invented, created, produced or conceived by someone working for Envirosuite (whether alone or jointly with another person) in the course of employment or contract with Envirosuite.

ECONOMIC SANCTIONS

Sanctions are measures used by governments and other international organisations to support national security interests and/or advance foreign policy objectives. Measures commonly imposed include financial restrictions, travel bans, and/or import/export bans on certain products.

Envirosuite is committed to complying with sanctions where applicable and expects all workers, clients, suppliers and other parties with which it deals, to also comply.