

## CODE OF CONDUCT

### 1. Policy Statement

ANI is committed to high standards of honesty, integrity, ethical and law abiding behaviour across all of our activities in order to protect and promote the interests of ANI, its shareholder and other stakeholders.

Compliance with this Code of Conduct (Code) will assist ANI in creating a safe, healthy and productive work environment and preserve and enhance ANI's reputation in the community.

Breaches of this Code will be taken seriously and may result in disciplinary action including up to termination of employment. Any breaches or suspected breaches should be reported immediately to a supervisor/manager or the General Counsel, or in accordance with the Public Interest Disclosure Policy and Procedure.

### 2. Purpose and scope

This Code sets out the standards of conduct and behaviour expected of ANI's directors, employees and contractors (ANI personnel) and operates in conjunction with ANI's policies and procedures.

The Code cannot cater for every scenario but will assist ANI personnel in using their judgement to make the right decision and in knowing what to do when something does not feel right.

### 3. Principles

#### 3.1 Honesty and integrity

To be successful it is critical that ANI has the respect and trust of its employees, customers, suppliers and shareholders.

ANI personnel will observe high standards of honesty, integrity, ethical and law abiding behaviour in all their actions and decisions.

Examples of how ANI personnel act with honesty and integrity are as follows:

- We do not use ANI property or information for our personal benefit or to harm ANI, or help others to do so.
- We do not offer bribes or other improper benefits to influence others, or accept any bribes or improper benefits.
- We deal fairly with each other and our customers and suppliers. We do not seek any improper advantage through concealing or misrepresenting information or any other unfair dealing practice.
- We immediately report any improper or dishonest behaviour and encourage others to do the same.

#### 3.2 Management of conflicts of interest

Appropriate management of conflicts of interest will ensure ANI's reputation is maintained and enhanced.

Conflicts of interest arise where a person's personal interest may, or may be perceived to, influence the person's work for or on behalf of ANI.

ANI personnel are expected to manage conflicts of interest responsibly by disclosing any actual or possible conflicts promptly and taking appropriate steps to avoid or resolve the conflict. For further guidance, refer to the Conflict of Interest policy.

Examples of how to appropriately manage conflicts are:

- Disclose any material interest (for example, shares or other commercial interest) you have in a competitor's or supplier's business to your manager.
- Do not make decisions about employment, engagement, promotion or termination on the basis of your personal interests.
- Seek your manager's written consent before accepting any positions with other businesses or organisations.
- Do not offer or accept any hospitality, payment or gift that might influence or be seen to influence your commercial decisions at ANI. For further guidance, refer to the Gifts and Benefits Procedure.

### 3.3 Confidentiality

Respecting the confidentiality of information is vital to ensuring the integrity of ANI's business and the trust of our stakeholders.

ANI personnel must not misuse confidential information, including in relation to ANI, its shareholder departments (Department of Defence and Department of Finance), its suppliers, customers or other third parties. Disclosure of any confidential information should only be made where it is appropriately authorised or required by law or where the information is already in the public domain.

This obligation continues after personnel have left ANI.

Examples of confidential information and how to manage confidential information are:

- Confidential information includes information about ANI's business strategies and performance, financial information in relation to ANI or a supplier, ANI's corporate policies and procedures, technical documentation, employee records and any information which ANI personnel knows or ought to know is confidential.
- Do not disclose confidential information to gain a personal benefit or a benefit for someone else.
- If you do not know whether disclosure or use of the information is permitted, seek advice from your manager.

### 3.4 Legal and policy compliance

Compliance with laws and policies ensure ANI is a good corporate citizen, role model, service provider and employer.

It is expected that ANI personnel will have a working knowledge of all laws, regulations and ANI policies which apply to them in their role at ANI and to seek training where required. ANI personnel are to comply at all times with all applicable laws and all ANI policies and procedures and to encourage others to do the same.

### 3.5 Respect

A respectful work environment will enable everyone to participate and contribute to their full potential.

ANI personnel are expected to treat each other and third parties with respect, fairness and courtesy. The health and wellbeing of all ANI personnel is important and a critical component to ANI's success. Bullying, harassment, unlawful discrimination or other offensive behaviour is not tolerated.

At ANI we value and respect diversity and encourage others to do the same.

Examples of how we treat each other and our customers, suppliers and stakeholders with respect are:

- We recognise and embrace our differences and listen to what others have to say.
- Whenever possible, we seek to collaborate with our colleagues, customers and suppliers.
- We communicate on social media appropriately and do not make inappropriate or offensive comments about ANI, ANI personnel, our customers or suppliers.
- We handle personal information of our colleagues and suppliers appropriately.
- We behave appropriately at work and work related social functions.
- Where necessary we remind our colleagues of their obligations, including their work health and safety responsibilities, and report any inappropriate behaviour.

### 3.6 Responsible use of ANI resources

ANI's resources and assets must be used appropriately to improve our customer delivery and enhance ANI's success.

ANI personnel should use reasonable endeavours to protect ANI resources and assets and ensure their appropriate use. ANI resources and assets should only be used for legitimate business purposes or as approved by ANI.

The theft, inappropriate or fraudulent use of an ANI resource or asset should be reported immediately to your manager or in accordance with the Anti-corruption Policy or Public Interest Disclosure Policy and Procedure.

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