

CODE OF CONDUCT

1.INTRODUCTION

1.1. PURPOSE

The Code of Conduct (“Code”) sets the requirements and expectations of behaviour at Enviropacific.

1.2. SCOPE

The Code applies to all employees, directors, contractors, consultants and others who act on behalf of Enviropacific under its instruction (“Applicable Person”).

1.3. COMPLIANCE WITH THE CODE

An Applicable Person has a responsibility to understand and comply with the Code. They must act in accordance with Enviropacific Principles of People First, Team Effort, Creative Thinking and Customer Focused, and perform their duties with honesty and integrity in all areas, including those not specifically addressed by this Code. It is expected that an Applicable Person will exercise common sense, good judgement, justify their actions and try to prevent any potential breaches.

Subject to applicable laws, regulations, industrial instruments and procedures, suspected violations of the Code and underlying policies will be investigated and disciplinary measures, up to and including termination, may be taken against an Applicable Person who:

- › violates the Code or does not adopt the Code advocated therein;
- › encourages any employees or other persons to whom this Code applies to violate the Code;
- › deliberately breaches the obligation to report a violation and fails to do so promptly, or withholds relevant information concerning a violation;
- › refuses to cooperate during an investigation related to a suspected or known violation; or
- › confronts an employee or other person to whom this Code applies who reports a potential violation.

There is nothing in the Code that would prevent Enviropacific from taking disciplinary action on matters involving employee misconduct, whether expressly covered by the Code or not.

2.BEHAVIOUR

An Applicable Person must:

- › comply with all laws, regulations, policies and procedures that apply to Enviropacific and its operations, including lawful and reasonable instructions by Enviropacific to enable compliance;
- › act honestly, in accordance with Enviropacific's Principles and in the best interests of Enviropacific;
- › refrain from acting or giving the appearance of acting contrary to the interests of Enviropacific;
- › keep confidential all Confidential Information and Personal Information;
- › maintain a professional standard of clothing and presentation at all times;
- › perform work in any Enviropacific business and location, as Enviropacific shall from time to time, reasonably require, following consultation with those employees affected;
- › carry out any other duties reasonably required by Enviropacific that are consistent with the employee's skills, competence, training, qualifications and statutory requirements;
- › work in a safe manner, including undertaking training in order to enable them to perform any duty within their range of skills;
- › adhere to start and finish times for all work periods; and
- › comply with all requests to undergo medical examination, which may include alcohol and drug testing, for specific work or as requested by certain contracts Enviropacific may enter. These will be undertaken by accredited personnel or a medical practitioner approved by Enviropacific or by its client(s).

Directors of Enviropacific must acquaint themselves with the general obligations imposed on them and Enviropacific by the Corporations Act 2001 (Cth). They must also familiarise themselves with other documents prepared by Enviropacific to meet corporate governance requirements. Certain of the more important Directors' legal obligations are summarised below:

- Directors must act honestly, and exercise reasonable care and diligence at all times in the performance of their functions;
- Directors or former Directors must not make improper use of information acquired by virtue of his or her position;
- Directors must not make improper use of his or her position to gain a direct or indirect advantage for themselves or any other person; and
- Directors have a fiduciary duty to Enviropacific and a duty to act with loyalty and in good faith.

2.1. PERSONAL PRESENTATION

As a representative of Enviropacific, an employee's appearance reflects on the image and reputation of Enviropacific to clients and the public. Clothing and footwear should be of a safe and sensible nature for the duties undertaken in the employee's role. Office employees are expected to dress in neat business-casual attire during working hours. Employees on-site must wear high visibility clothing and personal protective equipment will be provided.

2.2. BULLYING, HARASSMENT AND DISCRIMINATION

Employee safety is of vital importance to Enviropacific. Enviropacific is committed to providing a safe and healthy work environment in which all individuals are treated fairly, with dignity, respect and that natural justice will be afforded to everyone. Bullying, harassment and discrimination is unacceptable behaviour and will not be tolerated.

If an Applicable Person experiences, witnesses or otherwise becomes aware of a bullying, violent or potentially violent situation, or a similar situation, they must immediately report this to the HR Manager.

Enviropacific prohibits unlawful discrimination and harassment against any individual or group. Harassment is defined as any behaviour, often recurrent in nature, which negates an individual's dignity and the respect to which they are entitled because the behaviour is offensive, embarrassing or humiliating or creates a hostile or intimidating work environment.

Enviropacific provides its employees with equal employment opportunities without any discrimination or harassment based on race, colour, national or ethnic origin, religion, sex (including pregnancy or childbirth), sexual orientation, age (except as provided by law), marital status, family status, mental or physical disability, or any other prescribed status protected by law.

Detailed policies and procedures on bullying, harassment and discrimination, as well as the grievance procedure, can be found on MyEnviro.

3. HEALTH, SAFETY AND WELLBEING

Enviropacific strives to continuously improve the health, safety and wellbeing of employees and prevent injury and illness of employees, contractors, clients and the community. Enviropacific aims to send all workers (and visitors to sites) home healthy and unharmed each day.

Enviropacific expects each Applicable Person to observe applicable legislation, along with Enviropacific Health and Safety policies, procedures and guidelines, and the instruction of supervisors/managers. Work-related incidents and accidents, or any concerns about workplace health and safety, must be immediately reported their manager, HSE Advisor or the National HSEQ Manager.

For further information please refer to MyEnviro for all Health, Safety, Environment and Quality policies, procedures and guidelines.

3.1. ALCOHOL, DRUGS AND OTHER SUBSTANCES

Being fit for work and unaffected by alcohol, drugs or other substances is fundamental to the work activities undertaken by Enviropacific. Enviropacific maintains the position that:

- › No person will be permitted to work whilst affected by alcohol, drugs or other substances;
- › No unauthorised consumption of alcohol will be permitted on any Enviropacific controlled premises;
- › The use, possession, selling or offering of illegal drugs or other controlled substances will not be tolerated on Enviropacific controlled premises;
- › Workers taking over the counter or prescribed medication with known side effects are required to notify their supervisor, so that their fitness for work may be monitored;
- › Workers have a responsibility to immediately report any concerns about another person's fitness for work to their supervisor;
- › The services of a company-sponsored Employee Assistance Program will be made available to any person requiring assistance to deal with alcohol or other drug related issues.

Enviropacific will facilitate measures to ensure that all persons are fit for work and, in the event that person is not in a fit state for work, the appropriate action is taken to assist the person avoid harm to themselves and others.

4. ETHICAL BUSINESS PRACTICES

Enviropacific is committed to proper and ethical business practices and ensuring all Applicable Persons have a clear understanding of what represents ethical conduct. All Enviropacific employees play a critical role creating an ethical culture and a positive and open environment. Applicable Persons are always expected to act ethically and responsibly.

Enviropacific has a zero-tolerance approach to any forms of bribery or corruption. In particular, the practices of bribery, kickbacks and facilitation payments are expressly prohibited under the Code, as well as under anti-corruption legislation. Additional information on anti-bribery and corruption is set out in the Anti-Bribery and Corruption Policy available on MyEnviro.

4.1. WHISTLEBLOWER PROTECTIONS

Enviropacific is committed to creating and maintaining a positive and open environment where individuals feel they can come forward and report known or suspected business misconduct or improper state of affairs or circumstance (including unethical, illegal, corrupt or other inappropriate conduct) without being subject to victimisation, harassment, discriminatory or detrimental treatment. Enviropacific will not tolerate victimisation of a Whistleblower. Additional information on Whistleblower Protections is set out in the Whistleblower Policy available on MyEnviro.

4.2. FINANCIAL CONDUCT

An Applicable Person is strictly prohibited from carrying out fraudulent or dishonest activities. All statements and reports including expense claims, invoices, credit card statements, payslips and employee records, must be prepared carefully and honestly.

The following are examples of activities Enviropacific deem to be fraudulent and dishonest:

- › Falsification of supplier invoices or receipts;
- › Inaccurate or improper timesheets records;
- › Fictitious payroll transactions;
- › Deliberate false statements, made orally or in writing, about Enviropacific, other employees, one-self or work-related situations;
- › Approval or receipt of payment for goods not received or services not performed;
- › Misappropriation of funds, securities, supplies or any other assets;
- › Creating or altering hardcopy or electronic documents with the intent to defraud Enviropacific or its clients;
- › Falsification of financial or accounting data related to cash transactions;
- › Improper use or falsification of Enviropacific letterhead for non-business-related purposes.

4.3. INSIDER TRADING

Securities legislation imposes restrictions on the purchase, sale or other dealings of securities by anyone possessing “privileged” information that is not yet public knowledge and that could impact the share price of the securities of a given corporation. Enviropacific employees are therefore not authorised to sell or purchase securities of third-party companies with which Enviropacific has business dealings, when they have knowledge of material non-public information obtained in the course of employment, nor are they authorised to pass on such “tips” to anyone else. In addition, employees must take care not to inadvertently disclose confidential information to their spouse, family members or anyone else living in their household, or to business partners, friends or acquaintances, because this could be considered “insider trading”.

4.4. RESPONSIBILITY TO SHAREHOLDERS AND THE FINANCIAL COMMUNITY

Enviropacific is committed to providing value to its shareholders and recognising the legitimate interests of other stakeholders. Enviropacific has policies regarding the timely provision of information to its shareholders and other stakeholders including posting information to its website. It has processes to ensure that the accounts and financial information it provides represent a true and fair view of the financial performance and position of the Enviropacific. An Applicable Person must fully cooperate with, and not make any false or misleading statement to, or conceal any relevant information from, Enviropacific's auditors.

Directors are obliged to exercise sound judgement in their decision-making processes and will not attempt to influence their colleagues improperly in relation to issues or matters where independent judgement is expected of the other person.

5. COMPANY ASSETS AND INFORMATION

An Applicable Person is expected to use and protect Enviropacific's property appropriately and responsibly. This expectation applies to both physical property (including materials, tools, premises vehicles or revenue streams) and intangible property (including personal and confidential information, information technology systems, communication networks and intellectual property). Each Applicable Person must act in a reasonable manner and take appropriate safeguards to prevent losses attributable to the deliberate actions of others, whether these take place inside or outside of Enviropacific, and to prevent situations that could result in injuries, property damage, theft, loss, abuse or unauthorised access to physical assets or logical property, or to intellectual property (including data).

5.1. CONFIDENTIAL INFORMATION

Confidential information is defined as information, which is secret or not public, and can include trade secrets, techniques, product information and client lists. Applicable Persons are exposed to confidential information and trade secrets in the course of their engagement with Enviropacific.

All Applicable Persons will not, during the term of their engagement or thereafter, without the prior written authorisation of Enviropacific or as otherwise required by law, disclose directly or indirectly to any person, firm or company, Confidential Information or trade secrets of Enviropacific or its clients or potential clients. Nor will an employee use any part of the Confidential Information or trade secrets of Enviropacific or its clients or potential clients in any way other than as is required in the performance of their duties.

Employees must not prevent access by Enviropacific to Confidential Information by the use of passwords or any other means. All Confidential Information remains the property of Enviropacific and will not leave Enviropacific's premises without the written permission of the CEO or Company Secretary, except as required in the performance of the employee's duties.

PERSONAL INFORMATION

‘Personal Information’ is defined as information or an opinion about an individual whose identity is apparent, or can reasonably be ascertained, from the information or opinion. Enviropacific is committed to the protection of Personal Information in accordance with the standards set out in Privacy legislation and to collecting and processing Personal Information only for purposes relevant to Enviropacific's business. Use of Personal Information is limited to the purposes for which it was originally collected.

Employee records are held confidentially and securely within the HR department and can only be accessed physically by the HR/Payroll team. Copies of employee records or files can be requested by the employee or their Manager.

5.2. PROPERTY

Any right, title or interest pertaining to research and development, patents, copyrights or any other form of intellectual property derived from work performed while employed by Enviropacific, either alone or in collaboration, remains the property of Enviropacific. All files, notes and reports acquired or created in the course of employment remain the property of Enviropacific. Data that is generated on a corporate devices/network for the purpose of the business is the property of Enviropacific.

Information technology ("IT") equipment and tools are supplied to employees by Enviropacific primarily to facilitate and support Enviropacific's business operations and to help employees do their work. Such equipment and tools are at all times the property of Enviropacific. No individual may use, without prior written authorisation from their Manager or the IT department, IT equipment and tools for business purposes other than those of Enviropacific. IT equipment and tools must not be used for any illegal or improper purposes.

Enviropacific's name and logo are trademarks that cannot be used by employees except in the context of their functions according to the graphic design standards established by the Marketing department.

5.3. INTERNET AND EMAIL

The internet and email are important business tools. Internet access is provided to ensure Applicable Persons are provided with the tools and access to information required to undertake their roles. When using the internet and/or email, Applicable Persons are responsible for protecting Enviropacific's interests in accordance with the Code and the IT policies, procedures and guidelines.

REASONABLE PERSONAL USE

Personal use of the internet and email must be reasonable, appropriate and must not prevent an Applicable Person from performing their duties in whole or in part, reduce productivity or effectiveness at work, or negatively impact Enviropacific in any way.

While Applicable Persons are encouraged to engage in reasonable personal use of the internet access to fulfill certain training and professional development needs, they should not use the corporate network for purposes such as soliciting for commercial ventures, religious or personal causes, or to aide or benefit outside organisations.

IMPORTANT RESTRICTIONS

Certain types of information and communication available via the internet must under no circumstances be engaged with, created, downloaded, disseminated, printed or stored. Although this is not an exhaustive list, examples of prohibited material and communications include obscene, pornographic, sexually explicit, racist, offensive, criminal, slanderous, discriminatory, rude, violent, and harassing or hate messages. Violation of these restrictions could lead to disciplinary measures.

5.4. SOCIAL MEDIA

Applicable Persons are personally responsible for use of social media in a personal capacity, including for the content they publish. Identifiable personal use is use of social media where an Applicable Person can be identified as being associated with Enviropacific. The identification may be through means such as the Applicable Person's social media name, character, profile, photos or comments, including LinkedIn profiles. Accordingly, Applicable Persons who engage in identifiable personal use of social media must minimise the risk of damage to Enviropacific.

In any professional and identifiable personal use of social media, Applicable Persons must:

- › only disclose and discuss publicly available information;
- › ensure that all content published is accurate and not misleading;
- › ensure that all content published complies with all relevant policies of Enviropacific;
- › expressly state on all postings that the stated views are their own and are not those of Enviropacific;

- be professional in nature;
- adhere to the Terms of Use of the relevant social media platform/website; and
- comply with the laws of copyright, privacy, defamation, contempt of court, discrimination and harassment and all other applicable laws.

If an Applicable Person notices inappropriate or unlawful content relating to Enviropacific, or content that may otherwise have been published in breach of the Code or other Enviropacific policies, procedures or guidelines, it is required to report this content to the HR Manager or Company Secretary immediately.

5.5. VEHICLES

Applicable Persons may be required to use Enviropacific vehicles or other types of motorised equipment. Driving or operating vehicles is strictly prohibited while impaired or under the influence of any drug or substance. Employees are expected to drive with care, respect and courtesy. When driving a car or other vehicle, employees must comply with the laws and regulations in force in the location where they are driving. Employees will be held personally responsible for any violations or fine to which they may be subject.

5.6. MEDIA AND PUBLIC RELATIONS

Unless otherwise advised, the Marketing and Communications department, CEO and Company Secretary, manages all comments from Enviropacific to the media and all media enquiries should be referred to the Marketing and Communications department. Applicable Persons must not speak with the press or media about matters pertaining to Enviropacific, unless specifically requested by the CEO.

Media relations and public comment including public speaking engagements, comments on radio or television, opinions expressed to newspapers or in books, journals, internet sites or notices are prohibited without the express permission of the CEO. No Applicable Person is to represent or claim to represent Enviropacific on any matter without first having been given such permission.

6.CONFLICTS OF INTEREST

To maintain the trust of clients and the public, Applicable Persons are required to act loyally so as to protect the interests of Enviropacific. Each Applicable Person must not engage in behaviours that might be prejudicial to Enviropacific, its image and its reputation by avoiding conflicts of interest.

6.1. PERSONAL CONFLICTS OF INTEREST

A conflict of interest exists if an Applicable Person allows or appears to allow their personal/private interests or the interests of their family, relative or associates (a company they own, or in which they have an interest) to affect their ability to perform their work objectively, impartially and effectively. If there is a conflict of interest between an Applicable Person's personal/private interests and Enviropacific's interests, Enviropacific's interests must take priority. Applicable Persons must avoid putting themselves in a real, apparent or potential conflict of interest situation.

EXAMPLES OF CONFLICTS OF INTEREST

To determine the existence of a real, apparent or potential conflict of interest, an Applicable Person should consider whether:

1. their behaviour is in line with the Code, and Enviropacific policies and procedures;
2. they are performing their duties in an objective and impartial manner;
3. their actions or decisions result in (or give the appearance of resulting in) a financial or other benefit for themselves, someone with whom they have a personal relationship or a company or other entity in which they hold an ownership interest; and
4. they would be embarrassed to discuss the situation with their supervisor or colleagues.

The following are examples of real, apparent or potential conflict situations and the action to be taken:

- Doing or carrying out business with family/friends must be disclosed and the Applicable Person must not be involved in any selection process involving such persons.
- Information on business opportunities contemplated by Enviropacific should never be discussed with third parties in which an Applicable Person may have direct or indirect interest.

- › Direct supervision of anyone with whom an Applicable Person has a family relationship must be avoided as it could give rise to an appearance of favouritism.
- › Disposal of any Enviropacific assets in favour of an Applicable Person, their family, relative or associate for a consideration lower than fair market value must be authorised by the CEO or CFO.

REPORTING OR REGISTERING A CONFLICT OF INTEREST

If an Applicable Person believes there is a real, apparent or potential conflict of interest, the situation must be promptly raised, in writing to the employee's manager or the Company Secretary.

OTHER EMPLOYMENT

During an employee's employment with Enviropacific, if an employee wishes to seek concurrent employment at any other place of work or to engage in any other business, they are to seek the prior approval of the CEO. Enviropacific will not unreasonably withhold such permission, however it will consider such factors as whether the other employment or business is similar to or competitive with Enviropacific, whether the employee working at another place of work will harm Enviropacific operations or effect the employee's ability to carry out work for Enviropacific. In the event that a member of management is asked to become a board member of another company or organisation, they may not accept such an appointment without prior approval from the CEO.

6.2. BENEFITS OR FAVOURS RELATING TO BUSINESS ACTIVITIES

An Applicable Person must not seek to take advantage of benefits or favours that could arise or be discovered by them as a result of their employment or other engagement with Enviropacific. They must not use property or information of Enviropacific or its customers to their own benefit or to cause detriment to Enviropacific or its customers.

An Applicable Person must not seek to take advantage of their positions or any opportunity that could become available to them outside of the workplace or otherwise for personal gain, if the business opportunity is related to Enviropacific's existing or proposed business activities. Moreover, an Applicable Person must not use property or information belonging to Enviropacific or its customers for personal advantage.

Furthermore, subject to the business relationships that Enviropacific may already have negotiated or entered into with certain business partners, employees may not use the Enviropacific name to obtain discounts or any other preferential treatment, without written approval of the Company Secretary.

7. REPORTING BREACHES OF THE CODE

Suspected breaches of the Code involving a person dishonestly using their position in Enviropacific for gain or to the detriment of Enviropacific, such as fraud, corruption, dishonest conduct or illegal activity affecting Enviropacific must be reported in accordance with the Whistleblower Policy.

All other suspected breaches of the Code must be reported to an employee's manager or to the HR department or the Company Secretary.

8. REVIEW AND PUBLICATION OF THIS POLICY

The Board will review this Policy in two years or as otherwise required to check that it is operating effectively and whether any changes are required to this Policy. This Policy may be amended by resolution of the Board.

Approved by the Board on 20 April 2020