HUBiFY

UNIFYING PEOPLE AND TECHNOLOGY

Code of Conduct

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1.0 Trusted partner to our customers matters

The Board of Directors and the Hubify Leadership team take seriously our responsibilities as a Company upholding our reputation as a trusted partner to our customers matters. We commit to undertaking our business in a responsible and ethical manner with integrity and fairness.

What we do, and how we do it matters.

To ensure that we deliver upon this commitment we have developed the Hubify Code of Conduct, which sets out expectations for those who represent the Hubify brand. The purpose is to enable an understanding of what it means to act in a responsible and ethical manner with integrity and fairness.

The Hubify Code of Conduct provides a set of guiding principles for everyone who works in, and for Hubify (including Broadlands Solutions, ICNE, SMILE and United Lifestyle Group) as an employee, or contractor or partner.

We all have a shared responsibility to live this Code of Conduct and bring it to life for others.

Central to creating the Hubify Code of Conduct has been Our Purpose and Our Values:

Our Purpose

"Helping business and people perform and live better through technology"

Our Values

1 Accountability & owning customer outcomes

2 Driven to achieve growth

3 Desire to serve

4 Fun & enjoying what we do

Please take the time to read and understand the Hubify Code of Conduct. If there is anything you are not sure about, please speak up and raise it with your manager.

The Hubify Code of Conduct sets out our expectations and will help you to make good decisions, lead the way, and to **speak up** if you see something that you think isn't right.

Victor Tsaccounis
CEO – Hubify Ltd.

2.0   Why do we have a Code of Conduct?

### 2.1   Our Moral Compass

The Hubify Code of Conduct helps each of us navigate the daily realities of our working lives & helps us make sound decisions that protect our team & the Hubify reputation.

Because what we do, and how we do it matters.

The Hubify Code of Conduct covers all our relationships: with our team, our customers, our suppliers, our community, our environment and, inevitably, our shareholders.

Living by our Code of Conduct builds trust and respect internally and externally.

Poor behaviour impacts our reputation – it may discourage people from being:
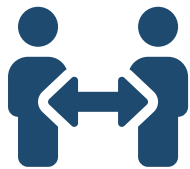
Customers   **Employees**   **Shareholders**

In a competitive and constantly changing environment, adhering to our Code of Conduct has never been more important. Honesty, integrity, and fairness are integral to the way in which we work and guide all our decisions.

2.2   Key Policies

This Code of Conduct should be read in conjunction with other important policies that are relevant to upholding the Code, including those referenced in this document.

If you have questions about the Code of Conduct, please contact any member of the Hubify Leadership team.

2.3   Who does the Code of Conduct Apply to?

This Code of Conduct applies to anyone who works for, or represents Hubify, including team members, directors and contractors, regardless of location.

It applies to you whenever you are identified as a representative of Hubify, which includes outside working hours or your workplace. Contractors, consultants and other partners should be advised that they are expected to observe the Code' of Conducts principles when we engage them to work with us.

2.4   Speak Up - it's everyone's responsiblity

You are encouraged and required to at once report any breaches of this Code of Conduct, and you should also report conduct if you think a breach may have occurred, but you are not sure.

The **Speak Up** section in this Code of Conduct will guide you on how to do this and provide information on how you will be protected against any retaliation for reporting genuine concerns about suspected misconduct.

2.5   The Hubify Code of Conduct

The Hubify Code of Conduct sets out the standards of conduct and behaviour we expect and require of all our team, based on our Values and the law.

It also reflects the expectations of our customers, suppliers, the community, regulators, and our shareholders. Legal and regulatory requirements which apply to our activities are often complex, yet ignorance does not relieve you of the responsibility to comply.

It is important you understand where to go for further information and support.

2.6   Breaches of the Code of Conduct

Breaches of the Code of Conduct are taken very seriously. Any suspected breaches will be investigated & if it is found you have breached the Code, you may face disciplinary action including termination of your employment. If the situation involves a breach of law or other regulation, it may also be referred to the proper regulatory body.

2.7   What we expect of you - our Team

As a member of the Hubify team, you are expected to act with honesty, integrity, and fairness & be accountable for your conduct.

You should:
- Perform your duties with care and diligence, and look to achieve excellence no matter what your role
- Act ethically and responsibly, and following the law
- Be accountable for your decisions and actions
- Deal fairly with all our customers, suppliers, business partners, competitors, and other team members

You are expected to know, understand, & manage your responsibilities, including:
- The risks and obligations which go with them
- Be aware of your own limitations and let your manager or other leaders know if you are not confident that you are able to manage the responsibilities given to you and the risks you are responsible for managing
- Be proactive in identifying and managing risk
- Don't assume something is okay because it's been done that way in the past, or it's what others do, or it's someone else's problem
- Speak up if you have concerns or, if you see or hear of something that may be a breach of this Code
- Don't ignore problems and hope that they will go away.

2.8   What we do, and the way matters

To bring our Purpose to life how we show up as an employer, how our team show up to each other and to our customers and partners is everything. As we each undertake our work in pursuit of our commitments to our customers and to the delivery of our work, we need to do so in a manner that reflects the Hubify Code of Conduct.

3.0　General Standards of Conduct

Our Code of Conduct sets the standards for the way we work and makes clear our Values to anyone dealing with us.

Outlined below are our **General Standards of Conduct** – our behaviour and actions aligned to Our Purpose and Our Values.

At is core the Hubify Code of Conduct requires all employees to:
- abide by all laws and regulations which apply to Hubify and its operations
- adhere to all Hubify policies and ways of working as amended from time to time
- observe the following General Standards of Conduct

General Standards of Conduct

Act with honesty, integrity, & fairness	**Act lawfully, ethically, and responsibly**	**Respect confidentiality**
Manage conflicts of interest	**Not engage in market misconduct**	**Participate only in other employment or business activities approved by Hubify, including directorships**
Communicate respectfully	**Observe media / public comment standards**	**Engage in fair competition**
Provide a fair and safe work environment	**Protect company property**	**Questions?** Contact any member of the Executive Team.

We expect our business partners and suppliers to conduct themselves in the same manner.

1. Honesty, Integrity, & Fairness

Hubify's Values define the way we interact with each other, our customers, and our stakeholders. We act with honesty, integrity, and fairness in all our dealings, internal and external.

We challenge actions that are inconsistent with our values.

Our Values

1. **Accountability & owning customer outcomes**
2. **Driven to achieve growth**
3. **Desire to serve**
4. **Fun & enjoying what we do**

2. Lawful, Ethical, & Responsible

Employees must follow all applicable laws and regulations.

You must ensure you understand & follow all Hubify policies, including this Code of Conduct.

Beyond legislated and written requirements, employees should always conduct themselves in a manner which is Open, Trustworthy and Be the Example.

3. Confidentiality

As a company, we routinely receive and handle confidential information. We preserve the trust placed in us by third parties by accessing information of this kind ONLY where it is necessary to perform our roles.

Employees must not use nor disclose confidential information unless authorised to do so and the use or disclosure is allowed by law.

Employees must not use confidential information for an improper purpose or to obtain a personal benefit for themselves or others.

Confidentiality

During your work you will come across confidential information about Hubify and its businesses. This could include technical, strategic or financial information, commercial arrangements or employee information, intellectual property such as patents, copyrights and trademarks.

You must use confidential information only for the purpose of doing your job.

You should protect it and ensure it is not disclosed except on a 'need to-know' basis to other Hubify team members or authorised recipients, or if required by law.

You should also keep confidential the information you come across in dealings with customers, suppliers, and other third parties.

Confidential information you may have from a previous employer must remain confidential and you should not share it in your current role. Your obligations of confidentiality to Hubify continue even if you leave Hubify.

Privacy

Hubify is committed to following laws governing privacy of personal information obtained by its businesses and protecting and safeguarding the privacy of people who deal with Hubify.

All personal information that we collect must be used, stored, handled and updated in line with the Hubify privacy policy.

If you have any queries in relation to your obligations, contact our Privacy Officer (COO).

Records management

We must ensure that we accurately and rigorously maintain all records relating to Hubify's business and its operations.

This requires the safe and efficient storage and handling of documents to ensure compliance with legal obligations and to preserve important documents.

Privacy Policy

4. Conflicts of Interest

Employees must either disclose or avoid situations in which there is a real or perceived conflict between personal interests and duties to Hubify.

Employees must declare all conflicts of interest upon joining Hubify and as new ones arise.

Employees should use the employee notification form do this.

All business activities or directorships must also be disclosed upon joining Hubify even if there is no real or perceived conflict of interest.

Conflicts of Interest cont.

Conflicts of Interest

Conflicts of interest may arise in various situations and the line between personal and professional interests can easily blur.

For example, you may have an interest in a business that has commercial arrangements with Hubify or one of its competitors, either directly or indirectly through a family member, friend or associate.

You could be in a personal relationship with someone else who works at Hubify which could create a conflict or perceived conflict with your and their employment duties.
You could be in a personal relationship with a customer or supplier that may prejudice or influence your business relationship or compromise Hubify securing the most commercially favourable terms for the purchase or supply of goods or services.

You may have previously worked with a supplier or customer of Hubify.

To manage conflicts of interest, you must disclose any real, potential or perceived conflict to the right people, including your manager and CFO/Company Secretary.

You must also get approval to accept any outside business interests including non-Hubify work, business ventures, directorships, partnerships, paid speaking engagements or other interests which have the potential to create a conflict of interest. If any conflict cannot be effectively managed or resolved, you will need to take action which satisfies the company to remove the conflict.

5. Market Misconduct

Insider Trading

You should never deal in the securities (including shares) of Hubify or other listed entities if you have inside information in relation to those securities. This is information, which is not generally or publicly available and, if it was, a reasonable person would expect it to materially affect the price or value of those securities. Additional restrictions on securities trading apply to the directors and Leadership Team of Hubify, and may be applied to teams working on specific projects.

If you are in doubt about whether you are free to trade Hubify securities, or those of other listed entities, seek the advice of the CFO/Company Secretary.

Market Disclosure Policy

Share Trading Policy

6. Involvement in other employment or business, including diectorships

Employees must not engage in other employment, business activities or directorships, whether paid or unpaid, which may create a conflict of interest between personal interests and duties to Hubify.

The real or perceived conflict may not only be between personal objectives and Hubify objectives but may also be a conflict between the time and energy that an employee can devote to Hubify because of his/her outside business activities or directorships.

Regardless of whether there is a real or perceived conflict of interest connected with other employment, business activities or directorships, employees must disclose all outside activities upon joining Hubify and seek permission to undertake new outside activities from the Chief People Officer and CFO/Company Secretary before accepting the employment, business activity or directorship.

7. Communications

Employees are expected to always communicate in a respectful and professional manner whether verbally (in person or on the phone) or in writing (in formal correspondence, emails, instant messaging, or SMS).

Employees should be aware that their use of all Hubify systems (including email and internet) is subject to internal surveillance and possible disclosure to regulators.

So, employees should have no expectation of privacy about access to and use of Hubify systems.

8. Media / Public Comment

Employees are not allowed to make public comments on behalf of Hubify. Only authorised persons may comment on behalf of Hubify.

Employees must not publicly discuss workplace activities, projects and practices nor disclose anything of a confidential nature.

Employees must refrain from speaking to media unless authorised to do so and refer all enquiries to the CEO or the CFO/Company Secretary.

You must get approval to accept any paid speaking engagements or other interests which have the potential to create a conflict of interest.

9. Fair Competition

As a company we are committed to achieving our competitive advantage through innovative, superior performance.

We follow all competition law requirements and do not engage in unethical business practices that limit or prevent competition.

Competition and consumer law

Compliance with trade practices, competition and consumer law is essential to maintaining our integrity and good reputation and ensuring we are not exposed to potentially significant penalties for breaking.

We support the law's intention to promote and maintain fair and open competition, to protect customers by providing them with correct information, and to be fair where there is unequal bargaining power.

We respect customers by supplying correct information, acting in a fair manner in our business dealings and acting independently of our competitors. You should actively follow these laws. If you are in a management or marketing role you must undertake regular training in this area. If you are unsure about any matter in relation to competition and consumer laws, raise it with your manager.

Anti-bribery and corruption

Corruption is against the law and undermines the integrity of governments and economies. You must never offer or accept bribes, kickbacks or similar payments, including any irregular payment to win business or influence a business decision in Hubify's favour. This also applies to consultants, contractors, or business partners dealing with or on behalf of Hubify.

Gifts and entertainment

We recognise that you may give or accept gifts, entertainment and hospitality in the course of your work for Hubify. However, you must ensure these are proper.

They should be of only moderate value and not give rise to any perceived or actual conflict of interest, or undue influence. 'Moderate' can vary depending on the circumstances but, as a guide, team members at Hubify must advise your manager and the CFO of all gifts and entertainment valued at or above $250.

Politicians and government officials

It is acceptable for authorised Hubify representatives to express our views to federal, state and local governments on subjects that affect our interests and operations. This must be done with the highest standards of ethics and following the law. Do not try to improperly influence an official.

Any dealings you have with politicians and government officers which relate to Hubify must be at arms-length and avoid any perception of attempts to gain advantage. Any political donations must be authorised by the Hubify Board and will be disclosed as required by law and recorded in our accounts. If you are to represent Hubify at any event or activity organised by a political party, politician, elected official or candidate you should first seek advice from the CFO/Company Secretary.

Responsible Business Dealings Policy

10. Fair and Safe Work Environment

As a company, we value each individual and the contribution each person brings. We embrace diversity and inclusion and treat each other with respect and kindness.

Respect, human rights, inclusion and safety
We are committed to treating everyone with respect, valuing diversity and supplying a safe working environment. Each one of us is responsible for fostering a safe and inclusive environment in our businesses and in the businesses which work with us.

Safety
The safety of team members, customers, suppliers and visitors across all our locations is our highest priority. We are committed to providing a safe working environment and complying fully with all local and national laws and regulations about safety in the workplace. We all need to take responsibility for our own health, safety and wellbeing and for those we work with. You can take responsibility by reporting any health and safety issues at once abiding by health and safety guidelines and always following safety instructions, following the alcohol policy that applies in your workplace; where alcohol is allowed at a Hubify site or function, it must be served and consumed responsibly if you are a smoker, not smoking during work hours outside of permitted breaks. We have zero tolerance towards illegal drug possession and use, and the misuse of prescription drugs at work, including at Hubify-sponsored functions or activities.

Harassment and bullying
We do not tolerate unlawful discrimination, bullying, harassment or other unacceptable conduct and we make employment decisions based on merit and performance.

You can help to create the right environment by supporting each other and working collaboratively and ensuring that no one in your workplace is being unlawfully discriminated against, bullied or harassed. You are expected to report any unlawful discrimination, bullying, harassment or other unacceptable conduct you observe. Harassment includes unwelcome behaviour of a sexual nature. If you are concerned about sexual harassment in your workplace, seek advice from the Chief People Officer.

Human rights
Hubify expects you and all those we work with to respect human rights and to maintain a work environment where this is understood and valued. We are committed to ensuring that our operations do not engage in modern slavery practices.

We are also committed to acting as quickly as practical to remedy any human rights violations that are reported to or found by us, including unfair labour practices. There are a few internationally recognised human rights and principles, including as set out in the: United Nations Universal Declaration of Human Rights UN Guiding Principles on Business and Human Rights; and UN Global Compact

We strive to ensure that our practices align with these rights and principles.

Inclusion
We are committed to having an inclusive workplace. Diversity is difference in all its forms, visible and invisible. An inclusive workplace is one where people feel they can be themselves and are welcome, regardless of their gender, gender identity, age, ethnicity or cultural background, sexual orientation, religion, health and physical ability, or educational background.

11. Use of Company Assets and Property

Hubify assets and property must be protected and used only for legitimate Hubify business purposes.

Hubify property (including computers/laptops, mobile phones, other devices and network systems) must not be used to communicate or distribute inappropriate or offensive language or material.

You are provided with access to Hubify's equipment, systems, buildings and services to enable you to do your job properly.

Personal use of some assets is allowed
Within reason but may require approval from your manager and must be proper, lawful and not interfere with your work. The unauthorised removal of equipment and other resources is theft, and any transactions involving Hubify's property or resources must be approved by senior management and accurately recorded.
Information systems

You must use Hubify's information systems, including email, the internet and telephones, appropriately to maintain and not put at risk their integrity.

You must also follow the policies in place to manage risks associated with information systems. Be aware that any information you create, share or download onto Hubify's systems belongs to Hubify.

Expenses
You can only claim from Hubify for approved work-related expenses. Claiming or trying to hide personal expenses among work-related expenses, even if the individual amounts are small, is a serious issue and a breach of trust that could affect your future employment. If it involves a breach of law, it may also be referred to the proper regulatory body.

Hubify property, funds, facilities and services are to be used only for authorised purposes and not for personal benefit, for example, all your expense claims need to be for legitimate and approved work purposes.

Your own device
It is important you get proper authorisation before you link your own personal devices to Hubify's information systems and abide by the relevant policy in using those devices.

Social Media
You must ensure that any use of social media and networking sites is following our Code of Conduct and relevant IT and social media policies.

Responsible use of IT & Social Media Policy

4.0   Additional responsibilities for leaders and managers

If you are a leader or manager, you have some added responsibilities.

Responsibility

You are accountable for all aspects of the area you supervise.

You can delegate tasks but your overall accountability for the actions of those you supervise cannot be delegated.

You must take steps to find & manage the risks in your area, including conduct of your team.

You must support your team to abide by this Code and hold them responsible for doing so.

Consequences

As a leader, you are responsible for taking proper action to address business conduct issues in a fair, consistent and prompt way, and to ensure the consequences of misconduct are recorded.

Set the tone, lead by example, and manage fairly and consistently.

Listen

You are responsible for fostering a culture that encourages people to feel comfortable and safe about speaking up and raising concerns.

Take time to listen and act appropriately when others come to you to raise a concern.

Once you become aware of an issue or incident you must escalate it following this Code.

If a team member who has raised a concern with you wants their identity to remain confidential, you must be aware of your obligations around protecting their identity. You must also be aware that detrimental action against that team member is prohibited.

Contact Hubify's Chief People Officer if you are unsure how to deal with an issue.

5.0   A guide to making good decisions

Every day we face choices and make decisions. That includes when we walk past behaviour that is not right but do nothing or assume someone else will take action. Sometimes the right thing to do in a situation is not clear.

Asking yourself a few quick questions can help to decide whether you may be in a situation which could result in a breach of our Code.
1.   Is what I am doing or being asked to do in line with our values?
2.   Is it in line with my personal values?
3.   Would I be comfortable explaining this to my family, friends or team members?
4.   Would I ask a member of my family or a close friend to do it?
5.   Is this behaviour legal and in line with our health, safety, environmental and human rights standards?

More generally, here's a framework which may be helpful for making good decisions. Stop and think before you act. Ask yourself.

Who will this affect?	Is this the right thing to do?	Is this the right thing for the long term?
Think about the impact of your decision on all stakeholders.	Are you in compliance with applicable legal requirements and our policies?	Balance any short-term gain against whether this decision will be positive for our reputation and our success over the long term.
Who might be affected your team, customers, shareholders, suppliers, your family, friends?	Even if you can do it, should you do it, & is it honest & fair?	
What information do you have and what assumptions are shaping your decision?	How would you feel if you or a family member were in the other person's shoes?	Does this benefit Hubify as a whole, not just a certain individual or group?

Do you have sufficient information to decide, and have you found and properly considered all material risks? Will you be able to look back on this decision and not regret it? Would you feel comfortable to be held publicly accountable for your actions, decisions or approach?

If you can answer 'yes' to all these questions, the action is probably okay.

But a 'no' or 'maybe' is a signal to stop and get advice or ask questions. If you are in any doubt, talk to your manager, Chief People Officer. We accept mistakes will be made and not everything goes to plan. The decision-making process must be rigorous, and support calculated risk-taking which is consistent with our values.

6.0   Speak up

We value your help in avoiding and uncovering possible misconduct. When you report your concerns, you help us to prevent problems from occurring or remedy misconduct that has already happened. In the process, you are making a valuable contribution to aid Hubify's keep the trust and respect of all its stakeholders.

Whistle Blower Protection Policy

Grievances Policy

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