



Code of Conduct Policy

This is a high-level summary for all staff. Full details are set out in the Code of Conduct Policy.

Our Commitment

LSH Group Australia is committed to conducting business ethically, responsibly and in compliance with all applicable Australian laws, including employment, privacy, competition, and anti-corruption legislation. This Code applies to all Employees and Directors and sets the standards expected in all business activities.

Conflicts of Interest

A conflict of interest occurs when personal, financial or other interests interfere, or could be seen to interfere, with the interests of the Company.

Conflicts may be:

- Actual
- Potential
- Perceived

Your Responsibilities

You must:

- Avoid situations that create or appear to create a conflict
- Act in the best interests of the Company at all times
- Disclose any conflicts as soon as they arise

Key Risk Areas

You must not, without approval:

- Have financial interests in suppliers, customers or competitors
- Engage in outside employment or business activities that conflict with your role
- Compete with the Company
- Be involved in decisions where personal relationships exist
- Take personal advantage of business opportunities obtained through your role

External Work & Business Activities

- Prior written approval is required before undertaking external employment or business activities
- These must not impact your role or create a conflict

ABN & Business Interests Disclosure

You must disclose:

- Any Australian Business Number (ABN) you hold or are associated with
- Any business interests, directorships or shareholdings

The Company may conduct reasonable checks to assess conflicts.

Failure to disclose or cooperate may result in disciplinary action.

Personal Relationships

You must declare relationships that could influence business decisions and remove yourself from related decision-making.

Political Activities

- Do not make political contributions on behalf of the Company
- Personal activities must not create conflicts or imply Company endorsement

Disclosure Requirements

All conflicts must be disclosed:

- Immediately upon becoming aware
- Via HR, Compliance, or approved reporting channels

How Conflicts Are Managed

The Company may:

- Remove you from decision-making
- Implement controls or monitoring
- Require you to cease the activity

Confidentiality

All disclosures will be handled confidentially and in line with privacy requirements.



Breaches

Failure to comply with this Code may result in:

- Disciplinary action (including termination)
- Potential legal consequences

8. Reporting Misconduct

- Speak up about suspected illegal, unethical, or unsafe behaviour.
- Reports can be made to:
 - Manager or Supervisor
 - Site Dealer Principal
 - Group Compliance Officer (shanan.asri@lsh.com)
 - Compliance Hotline (compliance.report@lsh.com)
 - HR Department
- The Company protects employees who raise concerns in good faith.

Acknowledgement

I acknowledge that:

- I have read and understood the Code of Conduct Policy – One Page Summary;
- I understand this summary does not replace the full **Code of Conduct Policy**;
- I understand that I am required to comply with its principles and guidelines;
- I understand that breaches may result in disciplinary action, up to and including termination.

I further acknowledge that this summary should be read in conjunction with the full **Code of Conduct Policy** which is available on the intranet.