

## CODE OF CONDUCT POLICY

### 1. Purpose

At Ryan Wilks we believe that socialising between co-workers, management, clients and customers can help to build staff morale and positive and productive working relationships.

The Company may organise staff social functions from time to time. These functions may be held either on work premises or at another venue. Whilst these functions are for the enjoyment of staff, clients and business colleagues may attend these functions on occasion.

Your behavior and conduct directly contribute to Ryan Wilks's overall business success and reflect the Ryan Wilks brand and reputation. At Ryan Wilks, we believe that everyone has a part to play in achieving our organisation's vision. A key component of this success relies upon the way in which team members conduct themselves.

Ryan Wilks's Code of Conduct requires each of us to ask ourselves 'What is the right thing to do?' during our employment and engagement and ensuring that we do it. We are all responsible for our actions.

This Code provides a practical guide about the standards of personal behavior and/or conduct that Ryan Wilks expects of all team members in all business activities and dealing with each other, customers, suppliers and other external stakeholders. It also sets out the responsibilities and proper practices for team members during their course of employment or work with Ryan Wilks.

This policy explains:

- what is considered appropriate behavior and conduct in the workplace whilst you are employed or engaged by Ryan Wilks;
- guidance on how to demonstrate Ryan Wilks's organisational values when performing your role or acting on behalf of Ryan Wilks; and
- the potential consequences and repercussions if a team member fails to comply with this Code.

### 2. Who does this policy apply to?

This Code applies to all team members during their course of employment or work with Ryan Wilks, including:

- in the workplace, during and after normal working hours;
- in connection with work, even if it occurs outside normal working hours (e.g. during layovers or at company provided accommodation);
- during work activities and work-related events;
- at other functions in your capacity as a representative of Ryan Wilks (for example, at social events organised by Ryan Wilks);
- during all staff and duty travel while an employee of Ryan Wilks (including during the flight and time spent at the airport prior to and following any such flight); and
- on social media, or through text messaging or email, where team members interact with other team members or guests.

### 3. Definitions

Term	Description
Laws	means all laws, regulations and codes of practice of every state in which Ryan Wilks does business.
Team member	means any director, officer or employee of Ryan Wilks, or contractor or consultant engaged by Ryan Wilks.

### 4. What are my responsibilities?

Employees are reminded that they must conduct themselves in a professional and responsible manner during staff functions and all employees are expected to meet the following behavioural standards:

- If alcohol is served during a staff function, employees must take an appropriate and responsible approach to alcohol consumption.
- Any use of illegal drugs during staff functions is strictly prohibited.
- Equal opportunity and anti-discrimination are a high priority within the Company and employees are required to be mindful of their behaviour consistent with the Company's Discrimination and Harassment & Code of Conduct Policies.
- Abusive language and swearing are not permitted in work situations including during staff functions.

Employees are required to treat all company property or other facilities (such as where a staff function is held at a different venue) with respect and care.

A breach of this policy may result in disciplinary action up to and including termination of employment. It is your responsibility to demonstrate the behaviors and conduct required by Ryan Wilks. All team members are required to abide by the following principles in all of their activities and dealings while working for Ryan Wilks:

- act honestly;
- be aware of and comply with Ryan Wilks's policies, procedures, operating manuals and employment contract applicable to your role with Ryan Wilks.
- perform the duties of your role to the standards required by Ryan Wilks and to the best of your ability;
- work in a safe, responsible and effective manner that ensures not only your own safety but the safety of others;
- comply with any lawful and reasonable direction given to you by the Ryan Wilks;
- present for work fit for duty;
- subject to taking authorised leave, maintain regular and punctual attendance at work;

- obey all Laws relevant to your employment (for example, complying with work health and safety laws, environmental laws and anti-discrimination laws);
- treat customers, guests, suppliers, fellow team members and the public with dignity, courtesy and respect;
- uphold the principles of equal employment opportunity and maintain a work environment free from discrimination, harassment, workplace bullying and victimization (in accordance with the Equal Employment Opportunity Policy);
- respect and safeguard the property of customers, suppliers and fellow team members;
- not take advantage of Ryan Wilks or customer property or information for personal gain or to cause detriment to Ryan Wilks or our customers;
- seek further guidance as required about your responsibilities through your Supervisor or a member of the People Team;
- ensure you notify your Supervisor if other team members are not behaving in accordance with this code;
- be proactive in protecting and furthering Ryan Wilks's best interests, and always act in the best interests of Ryan Wilks;
- act in a manner that reflects and upholds Ryan Wilks's brand, reputation and values;
- ensure personal business, financial and other outside interests do not conflict with your duty to Ryan Wilks.

## **5. Compliance with the law**

Ryan Wilks expects you to know, understand and comply with the Laws that apply to you:

- as a member of society (such as the prohibition of theft, assault and possession of illegal substances);
- as a team member of Ryan Wilks (including privacy, equal employment opportunity and health and safety laws); and
- Ignorance of the law does not excuse you from your obligations to comply with the law or this Code. If there is any question about legal issues or legal compliance, advice should be obtained before any decision is taken.

## **6. Business integrity**

### **1.0 Honesty, Integrity and Fairness**

- Team members must perform their duties and conduct Ryan Wilks's operations in a manner which is honest and of the highest integrity. We must maintain our business relationships in a manner which is consistent with the principles of respect for others and fairness.
- While compliance with applicable legal obligations is expected, our conduct must be of a standard which meets community expectations for an airline, including standards relating to safety and social responsibility.

## **2.0 Reporting**

- Team members must not knowingly participate in any illegal or unethical activity. Ryan Wilks is committed to fostering an environment where concerns about illegal or unethical behavior which affect Ryan Wilks or its business can be reported in good faith without fear of punishment. If a team member becomes aware of unlawful or unethical behavior a report can be made via the reporting avenues outlined in Ryan Wilks's Whistleblower Policy.
- The identity of the person making the report will remain confidential unless disclosure of the identity of the person making the complaint is required as part of the investigation process, by law or during legal proceedings. Any person who reports improper conduct in good faith and with reasonable grounds (provided they have not been involved in the conduct), will not be personally disadvantaged for having made the report.
- All reports of illegal or unethical conduct will be treated very seriously, will be reviewed and, where possible, investigated.

## **7. Working for Ryan Wilks**

### **1.0 Drugs, alcohol and smoking**

- You are required to comply with Ryan Wilks's Drug and Alcohol Policy. This means that you are responsible for attending for work free from the influence of illegal drugs or alcohol, and in a condition to perform your duties. In addition, you must not use, possess or sell illegal drugs on Ryan Wilks's premises, in Ryan Wilks vehicles, using Ryan Wilks's telecommunications equipment, or in conjunction with Ryan Wilks business or at Ryan Wilks functions.
- In addition, if you are required to take any prescription or other medicines, temporarily or otherwise, which may impact on the safe or efficient performance of your work, you must inform your Supervisor immediately.
- Smoking is prohibited on Ryan Wilks premises or in Ryan Wilks vehicles.

### **2.0 Equal Employment Opportunity**

- Ryan Wilks is committed to providing a workplace free of all forms of unlawful discrimination, sexual harassment, workplace bullying or victimisation. Ryan Wilks will not tolerate verbal or physical harassment or other behavior where the purpose or effect, even if unintended, is to create an offensive, hostile or intimidating work environment or which disrupts another person's ability to work. This obligation extends to the use of social media or networking sites.
- Ryan Wilks's Equal Employment Opportunity Policy provides further information about the obligations of team members in this regard.

### **3.0 Punctuality and diligence**

Reliable, consistent attendance at work is a requirement of all positions. Team members are expected to be punctual in attending work (that is, being ready to start work at the scheduled commencement time) and, subject to the taking of authorised leave, diligent and dependable in their attendance at work. Any absences must be notified in accordance with Ryan Wilks's policies and procedures.

## 8. What is serious misconduct?

Serious misconduct is inappropriate, improper and/or unacceptable behavior, or behavior that is otherwise inconsistent with a team members' obligations to Ryan Wilks which may justify summary dismissal (i.e. termination of employment or engagement, effective immediately, without notice) Serious misconduct includes, (but is not limited to):

- conduct that does or has the potential to damage the reputation, viability or profitability of the Ryan Wilks business;
- conduct that does or has the potential to damage Ryan Wilks property or the property of the Ryan Wilks customers or suppliers, or cause loss to Ryan Wilks;
- conduct that breaches Ryan Wilks's policies, procedures or operating manuals (e.g. Equal Employment Opportunity Policy), or conduct that breaches applicable law (e.g. anti-discrimination laws and workplace health and safety laws);
- conduct that is inconsistent with the duties required of a team member of Ryan Wilks (e.g. duty to carry out all lawful and reasonable directions, act honestly and in Ryan Wilks's best interests);
- willful or deliberate behavior by a team member that is inconsistent with the continuation of the contract of employment;
- conduct that causes imminent and/or serious risk to health or safety, including any deliberate, reckless or wilful act;
- acts of dishonesty; theft; fraud; assault; or abuse;
- discrimination, sexual harassment, workplace bullying or victimisation;
- being under the influence of drugs and or alcohol while at work;
- persistent or repeated acts of misconduct;
- viewing, sending or receiving pornographic images in the workplace (refer to the Email & Internet Usage Policy);

Conviction of an offence that constitutes a serious impediment to the carrying out of a team member's duties If you are alleged to have engaged in serious misconduct, you may be stood down effective immediately.

## **9. Ryan Wilks Property and Information**

### **1.0 Using Ryan Wilks Resources**

Ryan Wilks's assets should be used for the benefit of Ryan Wilks in the conduct of its business. All team members who have control of or access to Ryan Wilks's funds, assets, equipment, property, or goods are personally accountable for them. This means that we all have a responsibility to safeguard and use Ryan Wilks's resources properly, and to use such assets responsibly and only in the best interests of Ryan Wilks. Using Ryan Wilks funds, assets or opportunities for ourselves or other than for Ryan Wilks's business purposes or interests is unacceptable. Assets include our equipment, computer and information systems, data, vehicles, telephones and computers.

At all times, team members must use Ryan Wilks funds sensibly and effectively. Expenditures must be reported accurately and in a timely way.

Ryan Wilks recognises that many team members have family and domestic responsibilities and that it may be necessary to make or receive calls or emails from family and/or friends during the course of the working day. This benefit shouldn't be abused however, and personal calls and emails should be kept to a minimum number and duration so as to not interfere with your job performance.

### **2.0 Intellectual property**

Intellectual Property (IP) is a collection of intangible legal rights that allows the IP owner to do certain things to the exclusion of others. IP rights include confidential information, business and domain names.

Ryan Wilks owns the IP rights to anything you create or develop during the course of your employment or engagement with Ryan Wilks (for example, a report, web pages, software, a product, service, process or concept, etc.). Ryan Wilks is entitled to the exclusive benefit of the works created by you, and may request that you waive your moral rights to those works.

This obligation continues after your employment with Ryan Wilks ends.

### **3.0 Confidential information**

If you have access to confidential information you are responsible for ensuring that information is only used for authorised purposes and is protected from theft, unauthorised disclosure or inappropriate use.

Confidential information must not be disclosed to anyone outside Ryan Wilks without first obtaining approval from the General Manager of your Division. Your obligations to maintain confidentiality of Ryan Wilks's confidential information continue after your employment with Ryan Wilks ends.

### **4.0 Privacy**

Team members may have access to sensitive and personal information about fellow team members and Ryan Wilks's customers and suppliers and are responsible for protecting the privacy of that information.

Team members must only collect sensitive and personal information ethically, lawfully, in a fair manner and in a way that is not unreasonably intrusive. In doing so, team members must also inform the purpose involved of the purpose for which the information is being collected.

If team members do not have a business reason to access particular sensitive or personal information they should not seek to do so. If team members do have a legitimate business need to access sensitive or personal information, they must take precautions to ensure it is appropriately stored and that is not subject to inappropriate or unauthorised use or disclosure.

## 10. Conflict of Interest

We all have interests and activities outside of our work for Ryan Wilks. However, there is a possibility of a conflict of interest arising because of these outside interests. A conflict of interest exists where your loyalties are divided – where your personal interests or activities influence, or could appear to influence, your ability to act in the best interests of Ryan Wilks. Conflicts of interest must be avoided. Employees and officers owe their first duty of loyalty to Ryan Wilks. It is your responsibility to avoid placing yourself in situations or arrangements that may result in an actual, potential or perceived conflict of interest between yourself and Ryan Wilks.

Where a conflict of interest does arise, full disclosure must be made immediately and all relevant persons must not participate in any related decision-making process. Team members must not place themselves in situations which result in divided loyalties. Divided loyalties may arise:

- when a team member's private interests conflict directly or indirectly with the team member's obligations to Ryan Wilks; or
- when a team member owns, operates or is involved in any business or organisation that is in competition with any business of Ryan Wilks;
- when a team member receives benefits from a person doing, or seeking to do, business with Ryan Wilks which could be seen as creating an obligation to someone other than Ryan Wilks.

Further, team members must not act in ways which may cause others to question their loyalty to Ryan Wilks. Team members shall not accept payments, gifts or entertainment beyond that which is considered normal business practice. If any such benefit is offered that could be construed by others as improper, the offer must be reported to your General Manager.

Ryan Wilks expects you to devote all of your working time, attention and energy to the growth and success of Ryan Wilks. However, if you decide you want to take up a role in another business whilst you are working for Ryan Wilks, you must:

- notify your Supervisor before you decide to take up a role in another business not take up that role unless you first obtain your Supervisor's written approval. If Ryan Wilks provides its written approval, you must ensure:
- any work that you perform for that other business does not affect your Ryan Wilks work (e.g. conflicting hours, reduced flexibility around hours you can work, being tired etc. so that you cannot properly carry out your Ryan Wilks);
- you do not use Ryan Wilks' equipment or resources for that other work; and
- you notify your Supervisor if other team members are not behaving the same way in accordance with this policy.

## **11. Acceptance of Gifts or inducements**

The following items may not be accepted in any circumstances no matter what their value unless approved by the General Manager:

- cash;
- shares;
- gifts received during contract negotiations or a tender process if you are in a position to influence the outcome of the contract negotiations or tender award;
- gifts received from direct competitors;
- anything that may be reasonably construed or carry the suggestion of a bribe or inducement;
- anything that may reasonably appear to others to compromise the judgement of the person who is receiving the item; and
- anything that could embarrass Ryan Wilks if the gift was made public

## **12. Dress Code**

Ryan Wilks has a general expectation that its team members will dress to a standard that is neat and presentable and which maintains a professional image. Grooming, personal hygiene and clothing standards are seen as important factors in upholding the Ryan Wilks image.

If you are not required to wear a uniform, or dress to a certain standard due to the nature of your role, it is important that you dress in standard which is neat and presentable and appropriate to your role. You should speak with your manager for guidance about the appropriate dress standard.

At times, Ryan Wilks may choose to relax its dress standards for special occasions, e.g. 'jeans for genes' day. Ryan Wilks's dress code standards apply outside the workplace in any circumstances or situations where there is a connection to your employment with Ryan Wilks.

## **13. Compliance with this Code**

- Ryan Wilks takes its commitment to this code very seriously. All team members must comply with this Code (as may be amended from time to time).
- Any breach of this policy will be treated as a serious matter and may have serious consequences, including disciplinary action up to and including the termination of employment or engagement. In addition, if you breach the law you may be personally liable for your actions.
- If you become aware of any actual or possible breach of the code of conduct, you are encouraged to discuss your concerns with your Supervisor or a member of the People Team. You may also raise your concerns with a member of management.



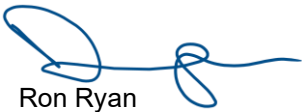
## 14. Variations

- Ryan Wilks may change or withdraw this policy at any time, including to take into account changes in legislation, industrial instruments and operational requirements.

## 15. Policy Links

- a. Equal Employment Opportunity Policy
- b. Drug & Alcohol Policy
- c. Email & Internet Usage Policy
- d. Ethics & Integrity Policy
- e. Discrimination & Harassment Policy

This policy will be formally reviewed in May 2027



Ron Ryan

General Manager

May 2025 Issue 5

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