



Click Studios Code of Conduct

Effective Date: July 1, 2020

The Click Studios Code of Conduct is intended to provide guidance for all directors, officers, employees, consultants, contractors and others working on behalf of the Company.

Click Studios understands that this Code will not contain the answer to every situation you may encounter, or every concern you may have, about conducting business ethically and legally. However, a good rule to follow is to consider whether you would feel comfortable if your potential actions or dealings were made public. If the answer is no, you should reconsider following through on them and consult with your Line Manager.

The Code has been endorsed by the Chief Executive Office and Senior Management Team and applies to all directors, officers, employees, consultants, contractors and others performing work for Click Studios (SA) Pty Ltd (ABN 68 552 128 552). If you are in doubt as to whether anything you are contemplating might breach the Code you should test yourself by asking the following questions:

Can this activity be justified in terms of the Click Studios Code of Conduct?

How would your family, friends or Employer react if your activity was published in the Media?

If there is an activity that you are proposing to undertake that involves no legal impropriety but which fails these tests, then you should not undertake that activity, even if it is not expressly prohibited by this Code.

The “**Effective Date**” of this Code of Conduct is the date specified above. This Code of Conduct supersedes all previous versions of the Code and your adherence to it is governed by your Contract of Employment with Click Studios.

Specific Standards of Conduct

1. Regarding Other Obligations

This Code is not intended to reduce or limit the other legal or contractual obligations that you may have with the Company. Instead, the standards in this Code should be viewed as the minimum standards that the Company expects from you in the conduct of its business.

2. Be Aware of Conflicts

There may be times when Personal Interests conflict with those of Click Studios or our customers. If the conflict is between your Personal Interests and Click Studios, you should take action to remove or manage the conflict so as to avoid any detriment to Click Studios Products, Services and reputation.

Senior Management, Supervisors, Employees and Contractors should be familiar with Click Studios internal Conflicts Management Policy. If you have a conflict, you must disclose that conflict to your Line Manager. Together, you and your Line Manager are then responsible for putting into place measures to remove or manage the conflict. The conflict must also be recorded in the **Code of Conduct: Conflicts Register**.

3. Don't Participate in Insider Trading

If you have non-publicly known, price-sensitive information such as information:

- a) Acquired through working with Customers;
- b) About a proposal;
- c) About any other entity in which Click Studios may have an interest; or
- d) That has come to your knowledge through your employment with Click Studios.

Then you must not:

- a) Pass that information on to any other person, other than when requested for work purposes and as approved by your Line Manager, or,
- b) Encourage any other person (for example, a family member or friend) to use that information for benefit.

4. Don't Make Unauthorized Gains or Payments

As a general rule, you should not accept (or offer to give) gifts, services, additional discounts, gratuities or other gains from (or to) people who conduct business with Click Studios.

Senior Management, Supervisors Employees and Contractors receiving gifts or soft dollar benefits from third parties, by virtue of their employment or association with Click Studios, must declare these to their Line Manager. Gifts may be accepted or declined with reference to the procedures outlined in the internal Click Studios Conflicts Management Policy. Accepted gifts must be recorded in the **Code of Conduct: Gifts Register**.

Click Studios may conduct promotional activities that involve the granting of nominal rewards to current and / or new customers. Any such promotional activities will be monitored to ensure that they are not being manipulated to achieve outcomes that are inconsistent with this Code.

5. Bribery is Illegal

The offering, giving, receiving, or soliciting of any item of value to influence the actions of an official, or other person, in charge of a public or legal duty is bribery.

The offering of bribes to anyone is prohibited. **Breaking this principle will compromise all concerned, is illegal and will impact your current and future Contract of Employment with Click Studios.**

6. Assets are Critical to our Competitiveness and Success

Assets including computer systems, the data on those systems, our intellectual property, branding and corporate processes and policies are the foundation of Click Studios competitiveness and success.

Click Studios assets are provided to you for conducting the business of the company. You must use the assets in line with the terms outlined in your **Contract of Employment** and not use the assets for personal gain or to compete against Click Studios.

Corporate processes, policies and IT configuration information relating to Click Studios operations are not

to be divulged to any customer or the wider public. The release of this information could, under certain circumstances, place both our global customer base and Click Studios ongoing operations at increased risk of cyber threats.

7. An Obligation of Care and Diligence

You need to exercise care and diligence in the performance of your duties. We all have a responsibility to Click Studios and our customers to ensure that our work is accurate, that we attend to detail and that we make decisions based on up to date information.

8. Protect Confidential and Personal Information

In the course of performance of your duties, you may have access to confidential information about Click Studios and its customers.

It is important not to use or distribute confidential information unless you have been given permission to do so. This includes;

- a) not giving confidential information to other employees or teams in Click Studios, unless required as part of their work and as authorized by your Line Manager, or,
- b) using confidential information for a different purpose without first obtaining authorisation from all relevant parties.

9. Everyone has Equal Opportunity

Click Studios has a long-standing commitment to Equal Opportunity for all employees.

All employees should have the right to work and advance on the bases of merit and ability, regardless of their **race, sex (including gender identity, gender stereotyping, sexual orientation, and pregnancy), colour, religion, disability, national origin, or age**. All employees and contractors working on behalf of Click Studios will be valued, respected, and free to develop and perform to their fullest potential.

In line with this **discrimination, bullying or harassment of any kind is absolutely inconsistent with our philosophy and strictly prohibited**. This includes ensuring you are polite, respectful and positive with all people you interact with regardless of the medium used.

10. Compete Fairly

Click Studios is committed to fair competition. When competing for business we do so vigorously but fairly. This means not intentionally misleading customers, Business Partners, Resellers or our global user community.

We will only use Click Studios reputation in legitimate ways and you should always refuse to engage in doubtful market practices.

11. Take into account Environment, Health and Safety before Making Decisions

Senior Management, Supervisors Employees and Contractors should strive to ensure that business decisions do not compromise our commitment to avoiding any injury to people. We will all comply at all times with local regulations, where we are unable to exceed them.

12. Don't make Unauthorized Public Statements

Only employees specifically authorised to do so may make public statements on behalf of Click Studios. You must take great care in public speaking engagements, media releases, when using social media and at official appearances. In particular, you must be careful in the following areas:

- a) **Sensitive information:** Ensure all non-public, price sensitive information concerning Click Studios is approved by the Chief Executive Officer before it is released publicly.
- b) **The public face of Click Studios:** Senior Management, Supervisors Employees and Contractors must not make comments that may be construed to be representing the official view of Click Studios. Any information we use (for example, in publications, memos, presentations or releases) must utilize information approved by the General Manager Customer Engagement and Technology.
- c) **Social media:** Do not post material that is offensive, obscene, defamatory, threatening, harassing, bullying, discriminatory, hateful, racist, sexist, infringes copyright, or is otherwise unlawful on Click Studios social media sites or on your own personal sites. Do not imply that you are authorized to speak as a representative of Click Studios, nor give the impression that the views you express are those of Click Studios, unless you are authorized to do so.

13. Be familiar with Policies and Procedures

You must make yourself aware of and understand Click Studios policies and procedures, particularly those that affect you in your role.

You must be clear on your limits of authority and never exceed those limits without written approval from your Line Manager.

14. Responsibilities to Click Studios and the Community

We all have a responsibility to Click Studios to deliver value through:

- a) The sustainable and efficient operation of Click Studios;
- b) Adoption and implementation of sound risk management processes; and
- c) Compliance with all with applicable laws, rules and regulations.

We have a shared responsibility to the community within which we work. We need to consider the impacts on our local and broader community when making business decisions.

15. Report Breaches of the Code

We all have a responsibility to report breaches of this Code. Click Studios maintains a Whistleblowing Policy that includes procedures for reporting breaches of this Code or concerns about unethical practices.

16. Obligation to Comply with the Code

You should adhere to the Code both in accordance with its terms and spirit. **Breaches of the Code may be subject to disciplinary action, including termination of employment.**