



The Intellihub Way: **Our Code**

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Our Purpose

Our vision is to simplify your energy transition.

Values

Look after each other.

Actively support each other's wellbeing both physically and mentally.

Be bold, be brave.

Challenge yourself and others by acting with courage.

Do the right thing.

Act with integrity for our people, customers, environment, and the community.

Together we own it.

Collaborate and be accountable to each other to achieve both individual and team goals.

About our code

Welcome!

Whether you're a part of the Intellihub team or an Intellihub supplier, customer or working with us in some other way, you're associated with a team that places values and doing the right thing, ethically and legally, above all else. In this code we set out what that means for you and Intellihub.

Our code applies to all

Our code applies to everyone who works with or for Intellihub – whether you are an employee, contractor, agent, officer, director or supplier or business partner.

Specific situations

The code is intended to be high level, to give a general guidance about the right kind of behaviour. It will not cover every situation, but together with its guidance, consider the following principles if anything comes up that you are not sure about: Is it legal? Does it feel right? Will it stand scrutiny?

Speaking up

It is important for our reputation, both as company and individually, that we say something if we have a concern. All concerns will be taken seriously and treated confidentially.

More information on this can be found in our Whistle Blower Policy.

Let's work together to keep Intellihub a great place to work!

Together with you in a positive working environment



Wes Ballantine
Intellihub Group CEO



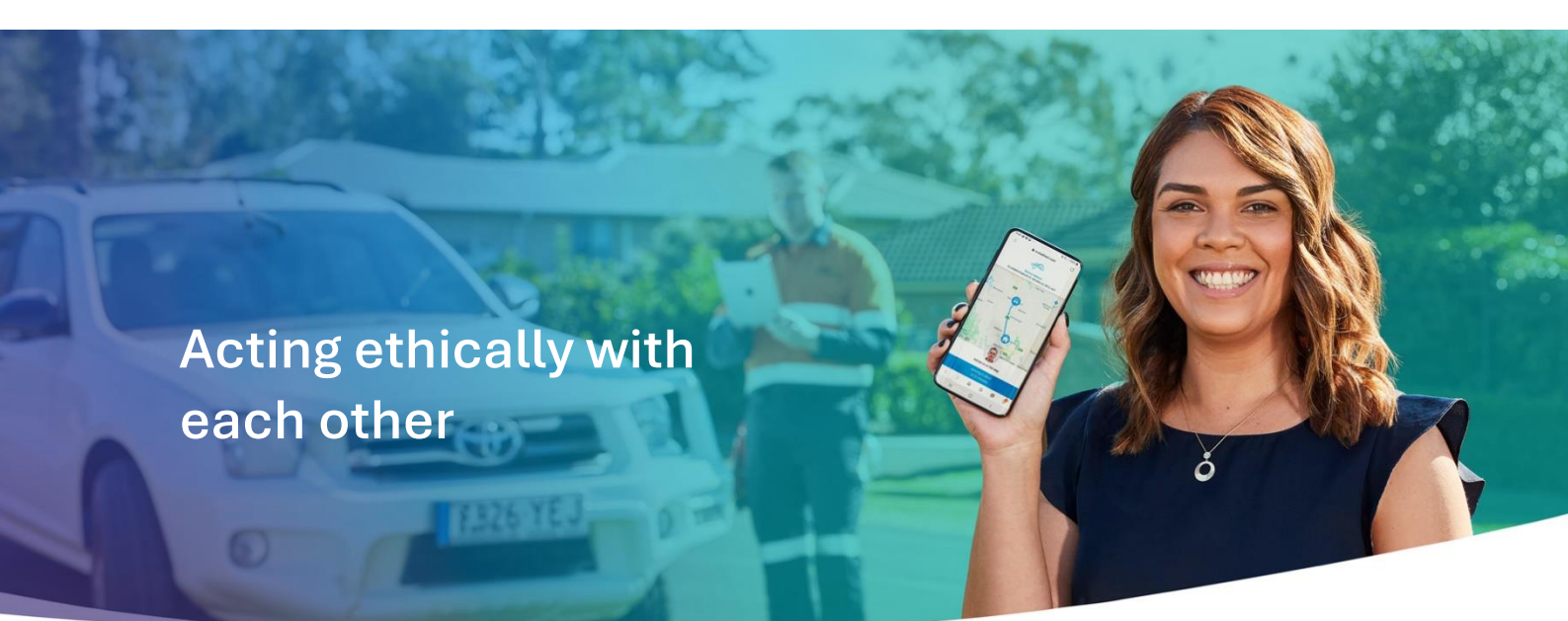


Health, Safety and Environment

Intellihub is committed to providing a safe and environmentally sustainable workplace, where our people feel empowered to actively participate, look out for the safety and wellbeing of each other, and contribute to continuously improving the management of our health, safety and environmental (HSE) risks.

We must:

- ◆ Establish, implement, and monitor processes for the elimination, reduction, and control of hazards and HSE risks, as far as is reasonably practicable,
- ◆ Set measurable objectives and targets for HSE to ensure continuous improvement aimed at elimination of work-related illness and injury or safety and environmental risks,
- ◆ Integrate HSE considerations into everything we do, including business planning and procurement decisions, through proactive communication, consultation, and coordination,
- ◆ Continuously improve and influence our ways of working through analysis of our HSE risks, incidents, hazards, and sharing our learnings across our business and contractors, and
- ◆ Engage in ongoing monitoring and auditing of activities and operations, and continually improving our HSE performance, management system and compliance with legislation and legal requirements.



Acting ethically with each other

A. Preventing harassment and bullying.

Intellihub will endeavour to provide a work environment that ensures fairness for all workers, respects diversity and inclusion, encourages trust and openness and is free from discrimination, harassment, sexual harassment, vilification, bullying and victimisation.

What is harassment?

Harassment is any form of behaviour (physical, spoken, or written) towards another person which:

- ♦ is uninvited or unwanted by the person;
- ♦ offends, humiliates, or intimidates that person and a reasonable person should have expected that to be the case; or
- ♦ targets the person on an illegal discriminatory ground, such as race, age, sex, or disability.

What is bullying?

Bullying is any unreasonable behaviour that is repeated and directed towards employees (individually or as a group), a client, contractor or other external party which creates a risk to health and safety.

B. Equal Employment Opportunity

We believe that employment and workplace related decisions should be made based on merit. Accordingly, the following considerations will not form the basis of employment/engagement decisions:

- ♦ Sex or gender
- ♦ Marital status
- ♦ Pregnancy
- ♦ Parental/family responsibilities
- ♦ Race
- ♦ Age
- ♦ Disability
- ♦ Sexual orientation
- ♦ Transgender status
- ♦ Political, religious beliefs or ethnical beliefs
- ♦ Trade union activity/inactivity
- ♦ Physical appearance
- ♦ Gender identity
- ♦ Intersex status
- ♦ Breastfeeding



We must:

Conduct ourselves in accordance with the spirit expressed in this policy by modelling appropriate behaviour as follows:

- ◆ Not doing anything which would appear to condone breaches of this policy; and
- ◆ Offering support to anyone who is subjected to behaviour which breaches this policy.
- ◆ Report the conduct they suspect may breach this policy to a people leader or to People and Culture.

C. Privacy and confidentiality

Intellihub respects the privacy of all individuals. All personal information that is collected from individual suppliers, customers, retailers' customers (consumers) and staff is subject to the federal Privacy Act 1988 in Australia and the Privacy Act 2020 in New Zealand. The obligations under these laws apply not just to the company but to individual staff too. There are serious consequences for failing to follow these laws as well as the Intellihub reputation suffering considerable damage.

What is personal information?

Australia: The Privacy Act defines “personal information” as “information or an opinion about an identified individual, or an individual who is reasonably identifiable: whether the information or opinion is true or not; and whether the information or opinion is recorded in a material form or not”

New Zealand: Personal information is defined as information that can identify a specific individual.

Among other things, this includes data such as:

- ◆ Names
- ◆ Phone numbers.
- ◆ Email addresses.
- ◆ Other observations where an individual is identified.

When can I disclose personal information?

Privacy law regarding disclosure is complex, but in general we should only disclose personal information for the purpose for which it was collected, a purpose it was consented to be used for or where otherwise allowed by law.

If unsure of any obligations or whether a disclosure might breach privacy laws, please reach out to the Legal Team. If in doubt, the safest option is not to disclose.



What is confidential information and can I disclose it?

Intellihub confidential information includes all non-public information about or relating to Intellihub and its operations, including information that might be useful to competitors or others, or that could be harmful to Intellihub if disclosed. This could include our marketing strategies, price policy, costs, inventories, innovations, production plans and capabilities, product specifications, roadmaps, and business activities.

It is not just Intellihub information that would be considered confidential. We should treat all our contracts and customer information as confidential. Also, information about/from your former employer is likely to be confidential and should not be disclosed to Intellihub or anyone else.

Confidential information can only be disclosed when you have the permission of the owner of the information and there is a compelling business reason to do so. Failure to keep the information confidential could be a breach of your employment contract or a supplier/customer agreement, depending on the circumstances. Your obligations of confidentiality continue after you finish working for Intellihub.

Further information relating to employees' privacy obligations can be found in the Data Privacy Policy.

We must:

- ◆ Keep confidential all information obtained while working at Intellihub unless we are required by law to disclose it.
- ◆ Ensure that any personal information is collected, handled, and disclosed only in compliance with the Privacy Act in the relevant country.
- ◆ Respect the privacy of customers, competitors and suppliers and never accept information obtained through unethical or inappropriate means.
- ◆ Carefully guard against disclosures of information to people outside Intellihub. This requires discretion when speaking with family members, business, or social acquaintances and when speaking in locations where the information can be overheard, such as public transport and lifts.



Acting ethically with external parties

A. How we interact with our customers and suppliers.

Employees are expected to deal fairly with Intellihub customers and suppliers.

Employees must never pursue unlawful or unethical means to gain unfair advantage of others through manipulation, concealment, abuse of privileged information, misrepresentation, or any other unfair dealing practice.

We must always be honest and ethical with our customers, suppliers, and competitors. We will do what we say we will do so that we can build long term relationships that are based on trust and respect.

We must:

- ◆ Be honest and open with our customers.
- ◆ Be honest and open when we've made a mistake.
- ◆ Look for solutions that benefit both our customers and Intellihub, since we succeed when our customers succeed.

B. Community and environment

The Intellihub reputation depends on its respect for the community and our environment. When out in the community, employees should act in a way that reflects positively on Intellihub. We should consider the effects of business decisions on the wider community and the environment and make sure they align with Intellihub's standing as a responsible member of society.



C. Competition laws

Intellihub is subject to competition laws wherever we do business. In Australia, the federal Competition and Consumer Act 2010 and in New Zealand, the Commerce Act 1986 are designed to stop practices that stifle fair competition.

The primary areas of anti-competitive conduct to look out for are:

- ◆ Collusion – including collusion to fix pricing, share markets or rig bids.
- ◆ Exclusive dealing – this means imposing restrictions on the right of a party
- ◆ we're dealing with to choose with whom, in what, or where they deal. This will be against the law only when it substantially lessens competition.
- ◆ Imposing minimum resale prices – we can recommend that a reseller charges a certain price but cannot stop the reseller from selling at below that price.
- ◆ Other anti-competitive conduct – this covers contracts, understandings or practices that have the purpose, effect, or likely effect of substantially lessening competition in a market.
- ◆ If you are unsure whether an action might breach the relevant competition law, please reach out to the Legal Team.

We must:

Act in a way that reflects positively on Intellihub. We should consider the effects of business decisions on the wider community and the environment and make sure they align with the Intellihub standing as a responsible member of society.

- ◆ Always comply with the competition laws in the country in which you are doing business.
- ◆ Avoid collusion with competitors.
- ◆ Speak to Legal if we are unsure about a particular action.

D. Gifts and entertainment

Gifts and hospitality can be a normal part of business and are not prohibited outright. What is important is that we do not let gifts or hospitality influence us or appear to influence us. When making business decisions for Intellihub, employees must use uncompromised, objective judgement.

We must:

- ◆ Not accept gifts or hospitality where there is a possibility that it could influence an outcome (or be perceived to be)
- ◆ Speak up if we think we feel that something is not right



E. Modern Slavery

What is modern slavery and how does it affect Intellihub?

According to the World Economic Forum, modern slavery is “a catch-all term to describe human trafficking, forced labour, debt bondage, sex trafficking, forced marriage and other slave-like exploitation”.

While Intellihub will never engage in any practices that could be considered to fall within the ambit of modern slavery, we need to be careful to make sure there are no such practices in our supply chain.

In Australia, the Modern Slavery Act 2018 requires us report on the risks of modern slavery in our operations and supply chains and actions we take to address those risks. Similar legislation is expected soon in New Zealand. At any rate, we expect employees in both countries - and wherever we do business - to be on the lookout for modern slavery by our suppliers.

At Intellihub, we do not tolerate any form of slavery and are fully committed to preventing slavery and human trafficking in our operations and supply chain.

We must:

- ◆ Be on the lookout for, and report, suspected cases of modern slavery by anyone associated with our company, including in our supply chains.
- ◆ Recognise things that may suggest that our vendors are engaged in modern slavery practices. These include (among other things):
 - Restricted movement of vendor staff (including being picked up in groups)
 - Vendor staff appear uneasy, unkempt, or malnourished.
 - Vendor staff show signs of physical or mental injuries.
 - A workplace also being used as accommodation.



Dealing with Intellihub property

A. Conflicts of interest

Employees should dedicate their best efforts to advancing Intellihub interests, independent of outside influences. This means avoiding conflicts of interest.

What is a conflict of interest?

When we have a personal interest that may influence, or be perceived to influence, our ability to act in the best interests of Intellihub, we may have a conflict of interest. Conflicts of interest arises more often than you might think, so we need to be on the lookout for them and handle them appropriately.

While it's not possible to describe every situation in which a conflict of interest may arise, here are some examples of situations that be conflicts of interest:

- ◆ An employee or family member receives an improper personal benefit.
- ◆ An employee directs Intellihub business to a supplier owned or managed by, or which employs, a relative or friend.

Corporate Opportunities

If an employee learns of a business or investment opportunity using Intellihub property or information or his or her position in the company, (including through a competitor or actual potential customer or supplier) he or she may not participate in the business opportunity or make the investment without the prior written approval of the Group CEO or CFO. Such an opportunity should be considered the company's first. No employee may use corporate property, information, or position for improper personal gain, or to compete with Intellihub.

We must:

- ◆ Disclose any relationships or financial interests that may represent a conflict of interest.
- ◆ Excuse ourselves from any work function or decisions where might have (or be perceived to have) a conflict of interest.
- ◆ Avoid holding roles with, or investing in, companies that have dealings with Intellihub (without company consent) if we're able to influence decisions.
- ◆ Speak up if we think there might be a conflict of interest.



B. Looking after Intellihub property and equipment.

Employees must safeguard Intellihub property and equipment and act to prevent negligent or careless use, waste, loss or theft, so that the company can conduct business efficiently, compete successfully and be profitable. Intellihub property and equipment may only be used for company business.

Incidental and occasional personal use of email and company-issued phones is permitted, but such use should be minimised. Note that use of Intellihub systems and assets is subject to monitoring.

We must:

- ◆ Not allow unauthorised access to computing equipment including servers, databases, systems.
- ◆ Not load, install or use unlicensed / unauthorised software, devices or services on Intellihub assets.
- ◆ Keep access credentials and passwords secure. System level passwords and user level passwords should be changed as per Intellihub Information Security Policies.
- ◆ Use Intellihub email for business purposes and not share email addresses on public forums or social media. Avoid sending unsolicited emails to multiple recipients (spamming)
- ◆ Not open attachments from unknown senders and avoid suspicious links (phishing). If in doubt, don't click on a link.
- ◆ "Clear Screen" Policy - Lock our screens when not at our computers and not leave sensitive information visible.
- ◆ "Clear Desk" Policy – Not leaving confidential information, credentials and business documents unattended or clearly visible, keep these in a secure and authorised storage space

For more information on managing security in day-to-day activity, business initiatives and operational processes, please refer to Information Security Policies and connect with the Security Manager.

For more information on the acceptable use of Intellihub information assets, please see the Acceptable Use Policy.



C. Fraud and corruption

Fraud and corruption are exceptionally serious activities that are never tolerated by Intellihub. These activities are illegal and carry the risk of criminal prosecution and serious penalties. In all business activities and in dealing with customers, suppliers, contractors, competitors or government officials or other employees, we conduct business with the utmost integrity.

We must:

- ◆ Not offer, give, or receive any type of bribe, kickback, or payoff (whether in cash, in kind, or in any other form) to anyone to influence a decision affecting the Intellihub business for the personal gain of an individual.
- ◆ Complete all documents accurately, truthfully, completely and in a timely manner as well as comply with the Company's review and approval procedures.
- ◆ Comply with Intellihub accounting and internal control procedures No undisclosed or unrecorded bank account, fund or asset may be established or maintained.
- ◆ Never sign another's name or sign on behalf of anyone other than themselves, unless authorised to do so.
- ◆ Speak up if we see or are approached to engage in corrupt or fraudulent behaviour.



Upholding our reputation and the law.

Intellihub depends on its reputation for quality, service, and integrity. Employees are expected to dedicate their best efforts to upholding the Intellihub reputation, including by always acting ethically and within the confines of the law.

A. Complying with the law generally

Employees should obey all applicable laws and regulations, regardless of whether they are specified in this Code. Breaking the law can have serious criminal and other penalties for employees and Intellihub.

B. No insider trading

It is illegal to trade in the shares of any company, or encourage someone else to trade, if we are aware of inside or non-public information that may have an influence on that company's share price. Insider trading is a serious criminal offence and should be steadfastly avoided by Intellihub employees.

C. Speaking externally

Intellihub designates specific employees to handle enquiries and questions regarding the company and our business from the media, members of the financial community, government officials or the general public. If you are not one of those people, you must not speak, or post on social media, as a representative of Intellihub. All enquiries concerning the Company from the media, financial analysts or the public should be referred to the Company CEO.

Enquiries from regulators or governmental agencies should be referred to the legal department. While we respect the right of our people to enter public debate on issues, employees should be careful to avoid giving the perception that their views are those of Intellihub.

We must:

- ◆ Only speak on behalf of Intellihub if we are authorised to do so
- ◆ Avoid making statements that could be interpreted as originating from or being endorsed by Intellihub unless authorised to do so
- ◆ Never make any comments about Intellihub or our staff that are vulgar, discriminatory, defamatory, harassing, or hateful.



D. Using social media and the internet

As noted above in 'Looking after Intellihub property and equipment', Intellihub equipment may only be used for company business. Incidental and occasional personal use of email and company-issued phones is permitted, but such use should be minimised.

So too, limited, and occasional use of Intellihub systems to engage in social media or online forums is acceptable, provided that it is done in a professional and responsible manner, is not detrimental to Intellihub business interests and reputation and does not interfere with a user's regular work duties.

Staff should be aware that web content filtering is applied and should not try to circumvent it. Social media use on company equipment is subject to monitoring.

We must:

- ◆ Not use social media to make discriminatory, disparaging, defamatory or harassing comments.
- ◆ Not make any posts that may harm the image or reputation of Intellihub or its employees.
- ◆ Not attribute personal statements, opinions, or beliefs to Intellihub or its businesses when engaged in blogging or using social media.
- ◆ Not use Intellihub trademarks, logos or any other Intellihub intellectual property in connection with any social media activity
- ◆ Always prioritise our Intellihub work ahead of personal use of social media
- ◆ Avoid using Intellihub equipment or systems to access inappropriate content.

More information is included in Intellihub Acceptable Use Policy and Social Media Policy.

Are there consequences if we do not follow the Code?

Intellihub is committed to a safe and harmonious workplace for all and where there is a breach of the Code, Intellihub will conduct a formal investigation. The investigation could lead to formal disciplinary action, including termination of employment.

