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## Code of Conduct

Adopted by the Kangaroo Island Plantation Timbers Ltd (KPT or “the Company”) Board on 24 September 2013 and reviewed annually, last reviewed in September 2020.

KPT aims to deliver superior long-term total shareholder return, whilst taking proper account of fellow employees, customers and others with whom we do business, as well as the communities and environments in which the Company operates. In striving to achieve these goals, we should not compromise our ethics or principles. Our culture of transparency places great importance on honesty, integrity, quality and trust.

This Code of Conduct sets ethical standards for the Directors of KPT. The Company has an Employee Code of Conduct and a Conduct and Ethics Policy Framework (made up of company policies and procedures) which further support these standards. The KPT team will pursue the highest standards of ethical conduct in carrying out their duties and responsibilities.

### **When does the code apply?**

The Code applies to the KPT team comprised of Directors, senior executives and employees.

### **How should breaches of the code be reported?**

Any breaches of this Code should be reported to the Chairman of the Board, the Chairman of the Audit & Risk Committee or the Company Secretary.

### **How will compliance with the code be monitored?**

The annual performance evaluation of each KPT team member will include a consideration of compliance with this Code.

### **Further information**

If an individual needs more information or is unsure of Kangaroo Island Plantation Timbers Ltd’s expectations or their obligations under this Code, please contact the Company Secretary.

### **The KPT team should act in the Company’s best interests and value the Group’s reputation by:**

- Undertaking their duties with appropriate care and diligence in accordance with their legal obligations;
- Dealing honestly and fairly with Company shareholders, customers, suppliers, competitors and any other third parties or business partners;
- Exercising any authorities responsibly and within their limits. The KPT team member is responsible for understanding their authorities, including any relevant limits, and are accountable for how they are used;
- Behaving in a way that takes into account our impact on the broader community and the environment in both the short and long term;
- Using all of KPT’s systems and equipment appropriately and for proper purposes. This includes email, messaging, internet access, and technology and banking systems;
- Not improperly disclosing any information about Kangaroo Island Plantation Timbers Ltd that is not already in the public domain, including after the relationship with the Company ceases; and
- If required by any regulatory body to provide information, answer charges or face proceedings in relation to any matter arising from engagement with the Company, notifying the Board which may appoint legal counsel to advise the KPT team or the Company.



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### **The KPT team should act with honesty and integrity:**

- Act honestly, fairly and with integrity in all of their dealings on behalf of the Company in a way that their honesty is beyond question;
- Not make promises or commitments they know the Company does not intend, or would be unable, to honour;
- Adhere to the truth, and not knowingly mislead directly or indirectly or make false statements, or mislead by omission;
- Not use the name of Kangaroo Island Plantation Timbers Ltd to further any personal or other business transaction; and
- Use goods, services and facilities provided to them by the Company strictly in accordance with the terms on which they are provided.

### **The KPT team should treat others with respect and value difference:**

- Treat all people with whom they deal through their work at Kangaroo Island Plantation Timbers Ltd with dignity and respect;
- Make appointment decisions based on merit, and not on attributes that are irrelevant to appointment or performance; and
- Never unlawfully discriminate, harass or bully anyone. This includes being sensitive to behaviour that may be acceptable to them but not to others.

### **The KPT team should respect and maintain privacy and confidentiality:**

- Ensure that confidential information relating to customers, KPT staff and KPT operations is not given by them either inadvertently or deliberately to third parties without the consent of Kangaroo Island Plantation Timbers Ltd; and
- Respect and maintain the privacy of personal information held or entrusted to the Company by its shareholders, customers, suppliers, competitors, employees and others and comply with the Privacy Act (Cth) 1998.

### **The KPT team should identify conflicts of interest and manage them responsibly:**

- Not improperly use information obtained by them as a representative of Kangaroo Island Plantation Timbers Ltd for personal financial gain, nor to obtain financial benefit for any other person or business;
- Fully disclose active private or other business interests promptly and any other matters which may lead to potential or actual conflicts of interest in accordance with such policies that the Directors may adopt from time to time;
- Fully disclose all relationships they have with Kangaroo Island Plantation Timbers Ltd in accordance with policies on independence that the KPT team may adopt from time to time. Any and all dealings with Company stakeholders should always be at arm's length to avoid the possibility of actual or perceived conflicts of interest; and
- Comply with the Company policies concerning disclosure of interests and the handling of conflicts of interest.

### **The KPT team should not make or receive improper payment, benefits or gains:**

- Never accept or offer any improper payment or benefit in connection with their role as a representative of Kangaroo Island Plantation Timbers Ltd;
- Never accept any gift, reward or entertainment, including discounted products, free travel or accommodation, if it could create any obligation or expectation that could conflict with their role as a representative of Kangaroo Island Plantation Timbers Ltd. If in any doubt, KPT team members should discuss the matter with the Chair of the Board or the Company Secretary;
- Never try to improperly influence the outcome of an official decision, for example by offering a payment or benefit that is not legitimately due. Such payments or benefits are unacceptable;
- Not use their status to seek personal gain from those doing business or seeking to do business with Kangaroo Island Plantation Timbers Ltd.
- Refer to KPT's separate Anti-bribery and corruption Policy.



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**The KPT team should abide by and comply with this code, the law and applicable Company policies and procedures**

- The KPT team are subject to diverse legal responsibilities and should be familiar and comply with all relevant laws and regulations applicable to them. Accordingly, individuals must not take any action, or fail to take any action, that may breach the law or applicable Kangaroo Island Plantation Timbers Ltd policies, procedures or practices;
- The Company is committed to ensuring the health, safety and well-being of the KPT team, contractors, consultants, and any visitors to its premises. All signs and notices displayed by the Company and any policies which the Company has in place regarding work health and safety must be obeyed;
- The KPT team are encouraged to report instances of actual or suspected fraudulent or unethical behaviour. The Company is committed to ensuring that concerns can be raised regarding unlawful, unethical or otherwise unacceptable conduct without fear of victimisation, harassment or discriminatory treatment.
- Refer to KPT's separate Whistleblowing policy.
- Refer to KPT's internal COVID response policy
- The KPT team must complete all induction and education programs required of them by the Board to build and maintain their awareness and understanding of relevant laws, policies, procedures and practices.