

Title: Code of Conduct

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Approved By:	CEO	Cross Ref No:	PP-Ignite-Legal-001 Privacy Policy PP-Ignite-HR-0007 Dress Code PP-Ignite-HR-0011 Disciplinary Policy and Procedure PP-Ignite-HR-0005 Conflict of Interest Policy PP-Ignite-HR-0010 Performance and Behaviour Management PP-Ignite-COR-0005 Continuous Disclosure Policy

1. Policy

- 1.1. Ignite Limited (“Ignite”) always upholds a high standard of ethical business behaviour and expects its Directors, Senior Executives and all employees to treat others in a fair, respectful, courteous and highly ethical manner.
- 1.2. Fairness, respect, courtesy and honesty in all dealings with any person connected to Ignite is the essence of this Code of Conduct Policy and it is the obligation of every Ignite employee to commit to conducting themselves in this manner.
- 1.3. The purpose of this Code of Conduct Policy is to set the expectation that all Ignite’s Directors, Senior Executives and employees will:
 - uphold high standards of honesty, respect, courtesy and personal integrity;
 - act in accordance with Ignite’s core values, which are connection, courage, understanding and ingenuity, and in the best interests of the business;
 - act in an ethical, legal and socially responsible manner;
 - treat fellow staff members with respect and not engage in bullying, harassment or discrimination;
 - deal with customers and suppliers fairly;
 - disclose and deal appropriately with any conflicts between their personal interests and their duties as a Director, Senior Executive or employee;
 - not take advantage of the property or information of Ignite or its customers for personal gain or to cause detriment to Ignite or its customers; and
 - not take advantage of their position or the opportunities arising therefrom for personal gain.
- 1.4. This Code of Conduct policy is designed to:
 - encourage adhering to standards that protect and promote the interests of shareholders and other stakeholders in Ignite;
 - guide Directors, Senior Executives and employees as to the practices considered necessary to maintain confidence in Ignite’s integrity;
 - set out the responsibilities and accountabilities of Directors and Senior Executives; and
 - detail the reporting and investigation procedure for unethical or unlawful practices.
- 1.5. The contents of this Policy are subject to change or withdrawal at Ignite’s absolute discretion.

- 1.6. Where this Policy refers to any obligation on Ignite, these references are a guide only and do not, and are not intended to, create contractual obligations on Ignite or give rise to additional rights or entitlements. To the extent of any inconsistency between this Policy and relevant laws, the laws will apply to the extent of the inconsistency.
- 1.7 In this Code of Conduct a reference to Ignite includes a reference to any subsidiaries and controlled entities.

2. Scope

2.1. This code of Conduct applies to:

- The Board of Directors of Ignite;
- Senior Executives of Ignite including:
 - The Chief Executive Officer
 - The Chief Financial Officer
 - Any other officer or employee who could materially influence the integrity, strategy and operation of the business and financial performance of Ignite; and
- All other employees of Ignite.

3. Compliance with Laws, Regulations, Policies and Procedures

3.1. Ignite requires and expects its Directors, Senior Executives and other employees to:

- comply with all laws, rules and standards that apply to Ignite in the conduct of its business and affairs;
- abide by all applicable laws, regulations, rules and standards of bodies empowered to regulate the industry in which Ignite operates;
- comply with all contractual obligations and other undertakings without attempting to evade or delay compliance;
- abide by all protocols, practices, policies and procedures of Ignite, including those directly applicable to Directors, Senior Executives and employees of all related entities and business units;
- act in a socially responsible manner; and
- support, adhere to and assist in furthering of the objectives of Ignite.

3.2. Employees are encouraged to seek guidance from Ignite's Senior Executives concerning the appropriate response to perceived unethical behaviour encountered within the Company or by competitors or customers.

3.3. Ignite, its Directors, Senior Executives and employees will cooperate with regulatory bodies in any properly constituted investigation.

4. Honesty and Integrity

4.1. Ignite expects that its Directors, Senior Executives and other employees will:

- deal fairly, respectfully, honestly and courteously with all parties;
- be ethical in all dealings with others, treating them with respect, courtesy and without discrimination, harassment, bullying or victimisation;
- not engage in fraudulent, corrupt or unlawful behaviour;
- refuse all payments and incentives from third parties that may compromise decisions, adversely affect judgments, or result in conflicts of interest; and
- represent Ignite honestly, and not provide false or misleading information.

5. Proper Use of Position and Resources

5.1. Ignite requires Directors, Senior Executives and other employees to comply with their legal, statutory and equitable duties. Each will apply and use their corporate position and corporate resources in a responsible manner.

5.2. Broadly this includes duties to:

- act in good faith and in the best interests of Ignite;
- act with due care and diligence during employment with Ignite;
- act for proper purposes and for bona fide reasons;
- comply with any lawful and reasonable directions given by someone in Ignite who has authority to give the direction;
- avoid conflicts of interest;
- refrain from:
 - making improper use of information gained through the employee's office or employment;
 - taking improper advantage of the employee's position;
 - making improper use of the employee's duties, status or power of authority to gain, or seek to gain, a benefit or advantage for the employee or for any other person; or
 - soliciting gifts or benefits from other parties; and
- at all times behave in a way that upholds the values, integrity and good reputation of Ignite including when attending work related functions or working internationally.

5.3. Ignite will not be bound by an agreement that is made by an employee where that agreement was made without appropriate authority and consent.

6. Confidentiality

6.1. All Directors, Senior Executives and other employees must:

- maintain confidentiality and ensure the security of all proprietary, commercial, or other information that is confidential to Ignite, its customers, candidates, suppliers, or employees that is acquired in the course of performing their duties for Ignite; and
- not make improper use of, or improperly disclose, confidential information to third parties, except as otherwise approved in writing by Directors or Senior Executives of Ignite, as required by law or the Listing Rules of the Australian Stock Exchange. Improper use would include taking advantage of property or information for personal gain or to cause detriment to Ignite or its customers.

6.2. Directors, Senior Executives and other employees must keep confidential the existence and details of Board and management information, discussions, deliberations and decisions to the extent that they:

- Are not publicly known; and
- Have not been approved by Directors or Senior Executives for public release.

6.3. All other information that is not publicly available concerning the activities, results or plans of Ignite must be used for authorised purposes only. Such confidential information should be treated and communicated with care and must not be disclosed outside Ignite without prior written permission from management.

6.4. Directors, Senior Executives, and other employees must treat all information given to Ignite by customers as confidential.

6.5. These obligations of confidentiality continue after the Directors, Senior Executives, and other employees' ceases employment with Ignite.

6.6. At the end of an employee's employment with Ignite and at any time on the request of Ignite, the employee must immediately deliver to or destroy all confidential information in the possession, custody, or control of the employee.

7. Privacy

7.1. All employees must comply with the Privacy Act 1988 (Cth), Australian Privacy Principles and the Ignite Privacy Policy as amended from time to time.

7.2. Employees must take all reasonable steps to maintain the privacy and confidentiality of candidates, customers, suppliers, and employees' information.

8. Conflicts of Interest

8.1. Directors, Senior Executives and other employees, including volunteers must comply with the **Conflict of Interest Policy**.

8.2. The Ignite **Conflict of Interest Policy** provides guidance on identifying and handling potential and actual conflicts of interest which relate to Directors, Senior Executives, employees, and volunteers. It is intended to raise awareness of conflict of interest issues and provide guidance to all those who perform a role within Ignite.

8.3. Ignite employees, Senior Executives and Directors are obliged to avoid and disclose ethical, legal, financial, or other potential or actual conflicts of interest involving Ignite and remove themselves from a position of decision-making authority with respect to any conflict situation involving Ignite.

8.4. In addition, during employment, employees should refuse any personal payment, inducement, or incentive from a third party offered to them whilst performing their duties as an employee of Ignite.

8.5. The primary obligation is to disclose the potential conflict of interest in advance. Failing to disclose a potential or actual conflict of interest appropriately could be regarded as serious misconduct.

9. Fair Dealings

9.1. Ignite will always respect the rights and dignity of employees by endeavouring to provide:

- fair, open, honest, dignified, equal opportunity and non-discriminatory treatment;
- a safe and healthy working environment;
- learning and development opportunities to maximise individual potential and contribution to Ignite;
- fair, competitive, and equitable remuneration; and
- the opportunity to receive feedback on their work and individual performance.

9.2. Ignite will engage only in fair and vigorous competition.

9.3. Ignite will treat employees, contractors, customers, candidates, and suppliers in a fair, open and honest manner.

9.4. Ignite expects its Directors, Senior Executives and other employees will:

- not take unfair advantage of any party dealing with Ignite through illegal conduct, manipulation, duress, undue influence, concealment, abuse of privileged or confidential information, misrepresentation of material facts, or any other unfair dealing; and
- recognise the importance of open, helpful, and timely communication in furthering Ignite's interests.

10. Gifts and Entertainment

10.1. Directors, Senior Executives, and other employees must not solicit gifts or benefits from any person. All employees must exercise due care and discretion when giving or receiving business related gifts or benefits.

- 10.2. Directors, Senior Executives and other employees must not give or accept gifts or entertainment from any person doing business with Ignite if the gift or entertainment could reasonably be regarded as influencing the recipient or creating business obligations on the part of the recipient that is, in the view of Ignite, to its detriment and disadvantage and creates a conflict of interest situation.
- 10.3. All Directors, Senior Executives and other employees must comply with the Conflict of Interest Policy with respect to avoiding and disclosing potential or actual conflicts of interests which include personally accepting anything of value whether cash or otherwise that conflicts with the individual's duties to the Ignite.
- 10.4. Gifts, rewards, or benefits of moderate value may be provided or accepted where it is legal and in accordance with ordinary business practice. Employees should consult their manager if they are in any doubt as to whether they should make or accept any offer of a gift or entertainment over \$50.00 in value.

11. Protection and Proper Use of Assets

- 11.1. Directors, Senior Executives and other employees must:
 - use best endeavours to protect the assets of Ignite;
 - report any suspected incidents (on reasonable grounds) of fraud or theft to a manager immediately for investigation;
 - use the assets of Ignite (such as funds, products, vehicles, and computers etc) for legitimate business purposes only in the best interests of Ignite (Directors or Senior Executives must approve asset use for any other purposes); and
 - protect the assets of Ignite (including proprietary information such as intellectual property, business and marketing plans, client information, employee information and any information concerning Ignite that is not generally known to the public, subject to Ignite's **Continuous Disclosure Policy** and where this obligation to protect Ignite's assets continues after Directors, Senior Executives and other employees retire from or cease employment with Ignite).

12. Political Donations and Activities

- 12.1. Ignite will not make any political donations to any political party, no matter what the persuasion, at any level of government, be it Federal, State or Local.
- 12.2. It is recognised, however, that it may be necessary from time to time, for legitimate business reasons, for employees to attend politically related functions.
- 12.3. Directors, Senior Executives, and other employees may personally make contributions to, and participate in, political activities provided they do not use Ignite's funds, time, equipment, supplies, facilities or other resources without the Board's approval in relation to those contributions or activities.
- 12.4. When attending political activities, Directors, Senior Executives, and other employees must ensure that they:
 - do not represent, or claim to represent the views of Ignite; and
 - do not claim to have the endorsement, consent or support of Ignite in expressing their private views.

13. Change

- 13.1. Ignite expects employees to remain open-minded about change in the workplace and to collaboratively support and embrace new ideas and programs.

14. Obligation to Disclose Relevant Information

14.1. Directors, Senior Executives, and employees are obliged to inform the Company of any change in their circumstances that may affect their ability to perform their normal duties.

15. Dress Code

15.1. Employees are expected to adhere to dress and presentation standards in accordance with the Ignite Dress Code.

16. Workplace Behaviour

16.1. The Code of Conduct articulates the high standards of honesty, integrity, ethical, and legal behaviour expected of Ignite's Directors, Senior Executives, and employees so that all contribute to a productive and harmonious working environment.

16.2. Ignite aims to prevent and minimise behaviour which may adversely affect the harmony of the workplace. Behaviour or conduct which is not consistent with the Ignite Code of Conduct is unacceptable and will not be tolerated.

16.3. Behaviour which would be considered unacceptable to Ignite includes (but is not limited to) the following:

- repeated failure to follow lawful and reasonable requests or directions of managers;
- abuse, rudeness or other behaviour which is in the opinion of Ignite unacceptable to clients or other employees and which in the opinion of Ignite is likely to injure the reputation, business or standing of Ignite;
- serious breaches of health and safety rules;
- accepting or offering bribes;
- serious breaches of the IT and Social Media Policy, such as downloading pornography;
- acts of dishonesty in relation to Ignite and its employees;
- breaches of confidentiality of information pertaining to Ignite or a Client of Ignite which in the opinion of Ignite is likely to injure or tend to injure the reputation, business or standing of Ignite;
- being consistently under the influence of illicit drugs and alcohol despite action under the Alcohol and Other Drug Policy;
- distributing illicit drugs in the workplace;
- fighting or physical abuse or other indecent behaviour in the workplace;
- sexual harassment, harassment, bullying, discrimination, victimisation on prohibited grounds (as protected and defined under the relevant State and Commonwealth legislations) against any employee, worker, client or supplier of Ignite;
- aggressive or abusive behaviour, whether physical or verbal;
- unsafe work practices or behaviour which may harm or cause injury to others; and
- breaches of a work rights verification procedure.

17. Workplace Relationships

17.1. Ignite recognises that employees may form or already have a personal relationship/partnership with another staff member.

17.2. To minimise risk to the parties involved, and to Ignite as a whole, these relationships are to be disclosed to HR so that any identified risks can be mitigated.

17.3. At all times the parties involved are to follow this Code of Conduct and other relevant Ignite policies and procedures, particularly if the relationship breaks down. HR will provide confidential support and guidance to any or all parties as required.

18. Work-Related Functions

18.1. Ignite and their customers or suppliers organise work-related functions from time to time, which may be attended by various employees and on-hire contract and temporary personnel. It is important for employees to remember that they are representing Ignite at any work-related function and therefore appropriate workplace behaviour is expected.

18.2. The following guidelines of appropriate workplace behaviour are expected to be met by all Ignite employees when attending any work-related functions, whether within or outside standard company working hours and including off-site social functions.

18.3. Employees of Ignite will:

- At all times ensure alcohol consumption is not excessive, and that you are within the required legal limit for operating a motor vehicle;
- not take, or encourage anyone else, to take any illicit drugs;
- abide by our policy in relation to smoking in the workplace when attending work-related functions;
- behave in a way that is respectful and courteous and is consistent with the Ignite Equal Opportunity & Anti-discrimination, and Bullying and Harassment policies at all times;
- maintain awareness of clients and ensure that client and business relationships are not affected, which could occur if employees fail to demonstrate appropriate behaviours;
- ensure that language of a sexual and explicit nature is not used, similar to how you would behave in the workplace;
- wear appropriate Corporate attire as per the Ignite Dress Code at any client or workplace social event, unless another dress code is explicitly specified on the invitation for an event;
- show respect for managers giving reasonable directions; and
- take reasonable care of the facilities and equipment used and provided.

19. Compliance with the Code of Conduct

19.1. Ignite is committed to promoting and maintaining a culture of honest, ethical, and law-abiding behaviour. To fulfil this commitment, Ignite needs to be able to ensure that:

- violations of these standards, requirements and expectations are detected and reported; and
- appropriate action is taken in response to any such violations.

19.2. Accordingly, Ignite encourages Directors, Senior Executives and other employees to report promptly in good faith any serious violations or suspected violations of this Code of Conduct, in particular:

- Directors should report any such violations initially to the Chairman of the Board, or failing that person, the CEO;
- Senior Executives should report any such violations to the CEO, or failing that person, to the Chairman of the Board; and
- Other employees should report any such violations to their immediate supervisor, or failing them, to their business unit manager or the CEO of Ignite.

19.3. Ignite affirms that where a Director, Senior Executive, or other employee reports in good faith, an actual or suspected violation of this Code of Conduct, the position of this individual will be protected, including through the following measures:

- the individual's identity will not be revealed without their consent (except where such disclosure is required by law); and
 - no disciplinary, discriminatory, or other adverse action will be taken (or tolerated) against this individual because of reporting, in good faith, that violation or suspected violation.
- 19.4. Ignite requires all Directors, Senior Executives, and other employees who receive a report of an actual or suspected violation of this Code of Conduct to take all reasonable steps within their control to ensure that:
- the behaviour alleged in the report is thoroughly investigated, the rules of natural justice are observed in that investigation and that appropriate disciplinary action is taken if the allegation is substantiated; and
 - the requirements set out in paragraph 18.3 are strictly complied with.
- 19.5. Directors, Senior Executives, and other employees who are proven to have breached this Code of Conduct will face disciplinary action which, depending on the seriousness and severity of the breach, could include dismissal or legal action, or both.