

CODE OF CONDUCT

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1 PURPOSE AND SCOPE

The InvoCare Pty Limited (InvoCare) Code of Conduct (Code) is designed to ensure consistency in how our people conduct themselves within InvoCare. Our C.A.R.E. values, Collaboration, Accountability, Responsiveness and Excellence are the foundation of the InvoCare Way and our success. Our values are included in this document as an integral part of InvoCare’s compliance and corporate governance framework.

The Code of Conduct is not meant to provide specific guidance on every situation where we might need to answer the question, “What is the right thing to do?”. Instead, it is principle-based guidance that helps us think about difficult situations, promotes consultation, and encourages us to speak up if we have concerns, the Code outlines minimum standards of behaviours and performance of workplace contributors to fellow employees, the community and to consumer, regulatory and professional bodies. You are required to uphold these standards both within InvoCare and when working outside the workplace to ensure the ‘good standing’ of InvoCare.

Together with other InvoCare standards (e.g. Policies, Standard Operating Procedures, Processes etc.) The Code of Conduct provides the framework for supporting legal and organisational accountable and responsible practice in all areas of work. You have a responsibility to ensure your knowledge and understanding of appropriate organisational conduct is up to date, while providing excellent service to our clients and operating within the law and InvoCare Policies and Procedures.

2 WHO MUST FOLLOW THE CODE OF CONDUCT?

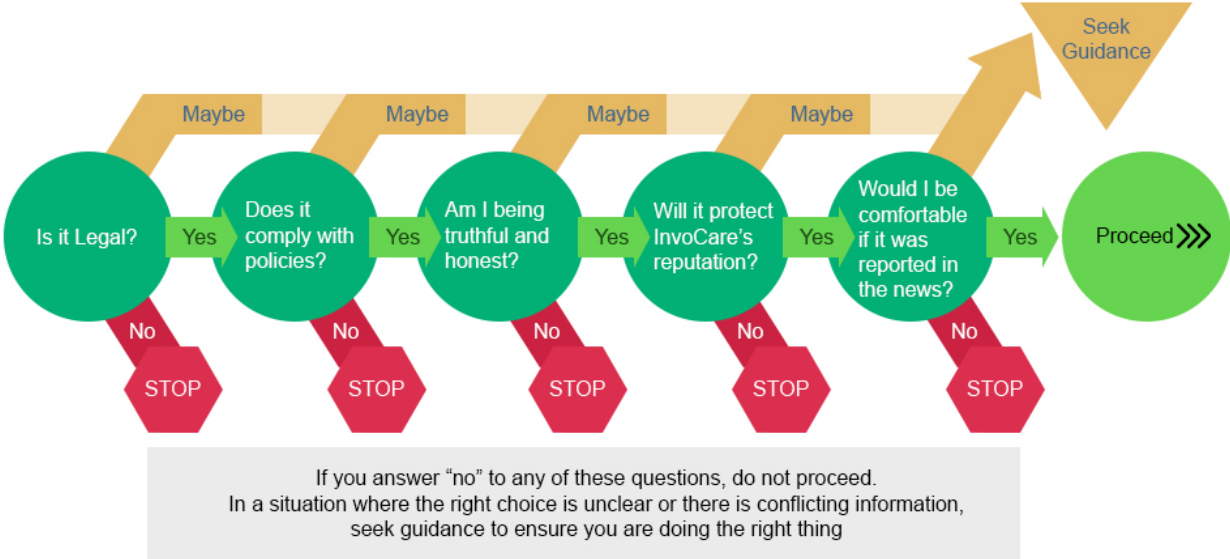
The Code applies to InvoCare directors, officers, employees and workplace contributors of InvoCare and its subsidiaries. This includes entities which InvoCare has the right to control.

- a) InvoCare independent contractors, sales agents, consultants and distributors must comply with relevant aspects of the Code and other relevant policies and procedures.
- b) Be provided with education and information of InvoCare policy requirements.
- c) Should you become aware of any issues, speak up and report any suspected Code violations, if a third party failed to comply with InvoCare compliance policies.

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3 RECOGNISING THE RIGHT THING TO DO

At the core of InvoCare is the commitment to doing the right thing. If you are ever unsure about a business action or decision, you should ask yourself the following questions:



If the answer to any of these questions is "no" or you are not sure, do not proceed. Always ask before acting. It is never OK to ignore our purpose and C.A.R.E. Values.

If you encounter situations in which the right choice is unclear or there is conflicting information, you are expected to seek guidance on how to ensure we do the right thing in that situation.

4 WHAT OUR PEOPLE MUST DO

- 4.1 Gain an understanding of the Code of Conduct and associated policies that are relevant to your individual job responsibilities by completing any training provided by InvoCare including e-learning modules.
- 4.2 Learn about your business and any procedures, policies or guidelines relevant to your role and how to apply them to your job.
- 4.3 Stay attuned to developments in your area that might impact InvoCare’s compliance with laws, regulations or reputation in the marketplace.
- 4.4 Report any suspected issues of non-compliance including breaches of the law, violations of the Code or any other applicable policies.

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5 WHAT PEOPLE LEADERS MUST DO

- 5.1 InvoCare holds its leaders accountable for maintaining our values and creating a culture of compliance...
5.2 Personally, set the example for integrity not just through words, but also through actions...
5.3 Create an open environment in which every employee feels comfortable raising concerns.
5.4 Ensure your people understand that business results are never more important than ethical conduct...
5.5 Ensure the utilisation of InvoCare control measures such as dashboards and scoreboards...
5.6 Conduct periodic compliance reviews.
5.7 Document and escalate any employee's expressed concern through appropriate channels.
5.8 Integrate employees' integrity contributions into evaluations and recognition and reward programs.
5.9 Take prompt corrective action to address identified compliance weaknesses.
5.10 Take appropriate disciplinary action.

6 POLICIES & GUIDELINES

The Code of Conduct does not address all workplace conduct. InvoCare maintains additional guidelines and policies to provide further guidance. Here is a list of many of the policies available on the InvoCare intranet Inform. If you are unclear of any relevant policies or procedures, you are required to speak to your supervisor or manager. If this assistance is not provided to you, you must contact your Regional or General Manager or Human Resources.

- The Competition and Consumer Act Compliance Policy
The Share Trading Policy
The Whistleblower Policy
The Anti-Bribery and Corruption Policy
The Gifts and Benefits Policy
The Delegation of Authority
The Privacy Policy
The Social Media Policy
The Travel & Entertainment Policy
The Bullying, Harassment & Discrimination Policy
The Health, Safety and Environment Policy
The Drug and Alcohol Usage Policy
The EEO Policy
Gifts and Benefits Procedure

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7 DIVERSITY AND INCLUSION

InvoCare bases employment decisions on fair employment practices, job qualifications and merit which include education, experience, skills, ability and performance. Employment decisions should also be made without considering a person's race colour, religion, national or ethnic origin, sex, sexual orientation, pregnancy, gender identity or expression, age, differently abled status, veteran status or other characteristic prohibited by law.

- 7.1 We respect human rights everywhere we work and do business with others.
- 7.2 InvoCare will comply with all laws pertaining to freedom of association, privacy, collective bargaining, immigration, working time, wages and hours and employment discrimination.
- 7.3 You may not refuse to work or cooperate with others because of characteristics covered by this policy, such as, race, religion, sex, age or other characteristic protected by law.
- 7.4 Never disclose employment data to a person who does not have a business need, the authority or where required, the subjects' consent.
- 7.5 Consult with your manager or Human Resources if you encounter a conflict between this policy and local laws, customs or practices.
- 7.6 InvoCare forbids the use of child or forced labour in any of our operations or facilities, and will not tolerate exploitation of involuntary servitude, exploitation of children, physical punishment or abuse. InvoCare fully respects all applicable laws in order to support the effective abolition of child labour. You must not do anything to violate these principles.

8 HEALTH SAFETY AND ENVIRONMENT

At InvoCare our people are our greatest asset. We are committed to high standards of safety to protect ourselves, our fellow employee's and, workplace participants and external parties who work at or visit our sites.

- 8.1 You must follow all InvoCare safety, security and standard operating procedures, as well as applicable laws and regulations. Nothing justifies working around or ignoring safety rules or procedures, whether a Company rule, regulation or law. If you are ever aware of, or suspect any unsafe work practices, unsafe conditions or other safety issue you must contact your supervisor or manager immediately. If you have any concerns about your health at work or the health of a co-worker, you must promptly contact your supervisor or manager.
- 8.2 InvoCare strictly complies with all health, safety and environment (hereinafter referred to as HSE) laws that apply to our operations in each country that we operate. We develop and follow safe work procedures to ensure workplace safety and prevent injuries. Our HSE principles apply to everything we do – from buying businesses to driving vehicles and disposing of waste.
- 8.3 Understand and comply with all HSE policies that apply to you, including:
 - 8.3.1 Corporate policies, business policies, and any specific policies of safe operating procedures that apply to your site, position or operation.
 - 8.3.2 Question unsafe or improper operations, and insist a “stop work” if necessary, to address them.
 - 8.3.3 Follow all InvoCare policies for managing, transporting and disposing of hazardous material or chemicals.

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9 DRUG AND ALCOHOL USE

We conduct business for InvoCare in a safe manner, free from the influence of any substance that could impair our job performance.

- 9.1 You must never use alcohol, illegal drugs, controlled substances or medication in a way that might harm your ability to conduct InvoCare business safely and successfully.
- 9.2 InvoCare may randomly drug and/or alcohol test people by utilising the processes outlined in the InvoCare Alcohol and Drug Use Policy.
- 9.3 You must not let the use of any substance adversely affect your ability to perform your job, even if you are using medication legally.
- 9.4 You must never possess drugs that you do not have a legal right to possess while on InvoCare property or while conducting InvoCare business.

10 THE CODE OF CONDUCT AND THE LAW

As a business, InvoCare operations, InvoCare employees and workplace participants are subject to laws of their respective country and the different jurisdictions in which we operate. Employees are expected to comply with the Code of Conduct and all applicable government laws, rules and regulations. The laws that govern your work activities are often complex, but ignorance does not relieve you of an obligation to comply.

- 10.1 You must never engage in illegal activities while on InvoCare property or conducting business for InvoCare.
- 10.2 You are personally responsible for complying with the law in your area of responsibility, including for example, competition and consumer laws. InvoCare will not indemnify you for any legal costs or penalties arising out of court proceedings where you have been found to have knowingly or recklessly breached the Competition and Consumer Law 2010 (Cth).

11 INTELLECTUAL PROPERTY

Intellectual Property is a valuable business asset. InvoCare protects its intellectual property (IP) and will enforce its rights against others who take or use InvoCare IP without proper authorisation. InvoCare owns the IP created by its employees in the course of their employment. IP includes processes, brands, business plans, marketing documents, graphics, software, proprietary information and many other things.

Proprietary information is information that is undisclosed, for example, not publicly known or generally available, and that is held in confidence.

- 11.1 Only use or distribute InvoCare's proprietary information for the benefit of InvoCare and not for personal gain.
- 11.2 Do not take, access, provide access to, or use any of InvoCare's proprietary information or IP without prior written authorisation when leaving InvoCare.
- 11.3 Consult with your manager if you have any questions or concerns regarding how to identify, handle and protect InvoCare's IP.
- 11.4 Do not provide InvoCare IP and proprietary information to a third party without proper internal approval and the necessary confidentiality agreement with the third party.
- 11.5 Understand that InvoCare may review, audit, monitor, intercept, access and disclose information processed or stored on InvoCare equipment and technology, or on personally owned devices permitted InvoCare network access.

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12 SUPPLIER RELATIONSHIPS

InvoCare’s relationships with suppliers must be based on lawful and fair practices. InvoCare only does business with suppliers that comply with all applicable legal requirements and InvoCare guidelines relating to labour, anti-slavery supply chains, employment, environment and health and safety, and that treat workers and others fairly and with respect. InvoCare safeguards information, including confidential and proprietary information and personal data, of both InvoCare and suppliers.

- 12.1 Always follow InvoCare processes, guidelines and procedures.
- 12.2 Protect InvoCare’s confidential and proprietary information including, where appropriate, with a confidentiality agreement.
- 12.3 Avoid potential conflicts of interest when you select a supplier and never accept improper gifts or other items of value.
- 12.4 Always report issues and concerns regarding supplier relationships, talk to your manager if you see unsafe conditions in supplier facilities including an apparent disregard of environmental or safety standards.

13 CONFLICT OF INTEREST

You have a duty to disclose any potential or actual conflict of interest. You also have a duty to ensure that nothing interferes with your ability to make all business decisions in the interests of InvoCare. This means that nothing you do should interfere, or appear to interfere, with your responsibility for objective and unbiased decision-making on behalf of the Company.

No activity at work or home should harm InvoCare’s reputation or good name. If your personal or financial activities interfere or have the potential of interfering with your allegiance toward the Company, you must raise this immediately with your manager. Misusing InvoCare resources or influence is prohibited. Even when nothing wrong is intended, the perception of a conflict of interest may have negative effects.

- 13.1 Obtain prior approval from your manager, executive level leader and Group Executive, Human Resources before hiring, promoting or directly supervising a family member or close friend.
- 13.2 Obtain prior approval before accepting officer or director positions with an outside business or not-for-profit organisation.
- 13.3 Disclose any financial interest you may have in a company where you could personally affect InvoCare’s business with that company.
- 13.4 Do not accept gifts other than those of nominal value from customers, suppliers or competitors as detailed in the Gifts and Benefits Procedure.
- 13.5 Do not accept personal discounts or other benefits from suppliers or customers if they are not available to the general public or your InvoCare peers.
- 13.6 While incidental use may be acceptable, do not use InvoCare resources, intellectual property, time or facilities for personal gain. Avoid any activity which creates the perception of a conflict between your personal interests and the interests of InvoCare.

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14 BRIBERY AND IMPROPER PAYMENTS

InvoCare Anti-Bribery and Corruption Policy and the Code prohibits bribery in all business dealings, in every country in which we operate. We maintain controls aimed at preventing and detecting bribery. We maintain accurate books records and accounts that correctly reflect the true nature of all transactions.

15 AVOIDING INSIDER TRADING

You must abide by the InvoCare Share Trading Policy and not buy or sell shares based on material non-public information (known as “insider trading”). Insider Trading is a criminal offence.

- 15.1 If you reveal material non-public information to anyone, including family and friends and that person buys or sells shares, you may be legally liable for “tipping.” This is true, even if you do not personally trade on the information.
15.2 Material non-public information (inside information) is information about a company that is not known to the general public and is information that is important when deciding whether to buy, sell or hold a company’s stocks, bonds or options (“securities”).

16 BUSINESS AND FINANCIAL RECORDS

Accurate record keeping and reporting reflects on the Company’s reputation and credibility, and ensures that the company meets its legal and regulatory obligations. Ensuring accurate and complete business and financial records is everyone’s responsibility, not just a role for accounting and finance personnel. This includes financial accounts, quality reports, time records, expense reports and submissions such as benefits, claim forms and resumes.

- 16.1 Never falsify a document.
16.2 Do not distort the true nature of any transaction.
16.3 Always record and classify transactions in the proper accounting period and in the appropriate account and department. Do not delay or accelerate the recording of revenue or expenses to meet budgetary goals.

17 KEEPING YOUR IDENTITY CONFIDENTIAL

When you make a report to the Whistleblower Officer you may choose to keep your identity confidential when you make your report through the process provided in the InvoCare Whistleblower Policy.

You are encouraged to identify yourself to facilitate communication, if you make your identity known, the Whistleblower Officer and investigators will keep your identity confidential in accordance with the whistleblower legislation.

To assist with confidentiality, avoid discussing these issues, or any investigation, with other employees. Because we strive to maintain strict confidentiality in all investigations, we may not be able to inform you of the outcome of an investigation.

- 17.1 If you work with someone who has raised a concern or provided information in an investigation, you should continue to treat the person with courtesy and respect.
17.2 If you become involved in a Code investigation, cooperate fully and answer all questions completely and honestly.

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17.3 Never retaliate against an employee who has raised a concern honestly, or participated in an investigation, this cannot be the basis for any adverse employment action including separation, demotion, suspension, loss of benefits, threats, harassment or discrimination.

18 VIOLATIONS OF THE CODE

If you become aware of any activity that you believe to be in breach of the Code of Conduct, you must report the matter to your Supervisor or Manager and/or Human Resources.

18.1 All reports will be investigated promptly and confidentially, without recrimination against the person making the report. When an employee is found to have breached the Code of Conduct, the final decision for violations of a serious nature may include suspension of employment; loss or reduction of incentives, awards or benefits; or termination of employment.

18.2 If there is a failure to comply with the behaviours outlined in the Code of Conduct and/or policies and procedures (or directing others to do the same), it is a serious matter that will be addressed by management. At times this action might lead to disciplinary action and even termination of employment.

18.3 Supervisors and Managers will also be held accountable for their own conduct, but also for that of any employees reporting to them.

18.4 If any person is found to be making malicious, vexatious or deliberately false reports, they will be subject to disciplinary measures up to and including termination of their employment.

18.5 InvoCare strives to ensure the disciplinary action fits the nature and circumstances of each Code violation. We protect against retaliation. If you report a concern, it will be handled with appropriate confidentiality and discussed with others only as needed or advisable under the circumstances.

18.6 The InvoCare Whistleblower Officer reports on Code investigations and Code decisions, and where relevant disciplinary action taken to the Group Executive Team and the Board of Directors.

19 ACKNOWLEDGEMENT

All new employees must acknowledge that they have read the InvoCare Code of Conduct and agree to abide by the Code. All employees will be required to acknowledge this agreement on a periodic basis. Failure to read the Code or confirm acknowledgement does not excuse an employee from compliance with the Code.

20 WAIVERS

Waivers of any provisions of the Code of Conduct must be approved by the Board of Directors or its designated committee and will be disclosed promptly to the extent required by law.

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21 RESOURCES

We all have a responsibility to uphold the ethical standards of InvoCare. If you observe behaviour that concerns you, or that may represent a violation of the Code of Conduct, raise the issue promptly.

You have several options for raising issues and concerns. You can contact any of the following:

- Your manager or
- Another manager
- Human Resources Business Partner
- The InvoCare Whistleblower Officer

If you become aware of any activity that you believe to be in breach of the Code of Conduct, other applicable policies or that may breach the law, you must report the matter to your Supervisor or Manager and/or Human Resources.

InvoCare Whistleblower Officer contact details

Email: compliance@invoCare.com.au

Call +612 8918 5050 and InvoCare employees dial 90392 from your Mitel phone.

Whistleblower Policy

InvoCare is committed to conducting all business practices in a professional, lawful and ethical manner. The Whistleblower Policy is an integral part of InvoCare’s compliance program and corporate governance framework. InvoCare encourages directors, workplace participants, suppliers, customers, agents and other third parties to report any possible instances of possible breaches. InvoCare’s directors, officers, employees and contractors have a duty and responsibility to conduct themselves in a fair and legal manner in all aspects of business. For further information please refer to the full InvoCare Whistleblower Policy.

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22 REFERENCES AND DEFINITIONS

22.1 Definitions

Term / Acronym	Definition
Asset	Anything a person, company or group owns, including money, property and investments.
Breach	Any behaviour by a person that leads to disciplinary action resulting in a record of the outcome in his or her personnel file. Business conduct breaches include but are not limited to concerns over fraud, theft, dishonest business activities, misappropriation of Company resources, incorrect health and safety practices, conflicts of interest, corruption, harassment or bullying or any other unethical behaviour in the workplace. See also Serious Breach.
Bribery	Bribery is the act of giving or receiving something of value in exchange for influence or action in return, that the recipient would otherwise not offer.
Business Partner	Third parties that interact with others on behalf of InvoCare or InvoCare owned or controlled entities, such as agents, brokers, intermediaries, advisers, consultants, representatives, joint venture partners and co-investors.
Close Relative	A spouse, dependent child or any other person living in the same home with the employee, officer or director including immediate family which may include a parent, sibling, child, mother- or father-in-law, son- or daughter-in-law or brother- or sister-in-law.
Discrimination	Unjust, intolerant treatment of different categories of people or things, including but not limited to race, age or sex.
Drug	A medicine or illicit substance which has a physiological effect when ingested or otherwise introduced into the body. See also Illegal Drugs.
Harassment	Behaviour an individual or group finds unwelcome, humiliating, intimidating or hostile.
Health Safety and Environment (HSE)	HSE management is responsible for planning, implementing, monitoring and optimising operational processes in the areas of environmental management, health protection and occupational safety.
Illegal Drugs	Drugs determined by law to be illegal or prescription drugs held without a valid prescription. Includes marijuana, LSD, cocaine, heroin, MDMA, other narcotics, hallucinogens, barbiturates, amphetamines or tranquilizers not under a Doctor's orders for your consumption.

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Code of Conduct

Term / Acronym	Definition
Illicit Activity	Activity by a person or organisation forbidden by law, rules or custom.
Inappropriate Material	Includes pornographic or sexually explicit or exploitative images or text; materials promoting violence, hatred, terrorism or the intolerance of others; and any material that is obscene or abusive.
Information Systems	Systems that use information technology to capture, transmit, store, retrieve, manipulate or display information.
Inside Information	Information that is not generally available and which could, if available, have a significant effect on the price of a company's securities. Inside Information may include matters of supposition, matters that are insufficiently definite to warrant being made known to the public and matters relating to a person's likely intentions.
Intellectual Property (IP)	Intellectual property (IP) refers to creations of the mind, such as inventions; literary and artistic works; designs; and symbols, names and images used in commerce.
Leader	Any InvoCare employee, workplace contributor or contractor who has other persons reporting to him or her or who has the authority to allocate resources.
Manager	Any InvoCare employee, workplace contributor or contractor who has other persons reporting to him or her or who has the authority to allocate resources.
Outside Activity	Includes positions in government advisory bodies, political parties, professional institutions, trade organisations, charitable public, social or sporting organisations and similar groups.
Personal Information	Information of data relating to an individual who can be identified by that information or data alone, or in combination with other information or data which is in InvoCare's possession.
Pornography	Verbal, visual or auditory material that embodies or depicts women, men, children and/or animals in sexual acts.
Privacy	The ability of an individual or group to keep their lives and personal affairs out of public view, or control the flow of information about themselves.
Retaliation	Action by way of unfair, unlawful or otherwise inappropriate reprisal taken in return of an actual or perceived injury or offence.

Code of Conduct

Term / Acronym	Definition
Serious Breach	Behaviour that has led to a final warning or termination of an employee or third party, including contractors, workplace contributors, suppliers and agents representing InvoCare or has a major reputational impact on InvoCare.
Sexual Harassment	Any unwelcome verbal or physical sexual advance or request for sexual favours.
WHS	Work, Health and Safety
Whistleblower	A person who, in good faith discloses activities of a person or organisation who may be engaged in inappropriate or illegal behaviours or dealings including breaches of the Competition and Consumer Act 2010 (CCA).
Workplace Contributor	An employee or contractor of InvoCare.

23 DOCUMENT REVIEW

23.1 Review Cycle

This procedure will be reviewed as a minimum every 5 years or earlier when material changes in legislative, regulatory or organizational requirements occur.

24 HISTORY

Date	Version#	Description of Updates	Author
15/06/2015	1	New document	Unknown
16/07/2019	2	Full review and rewrite for legislative and ASX regulatory and compliance	Saxon Hansen
05/03/2020	3	Formatting changes	Melissa Saxby
1/12/2020	4	Added clauses 4.4 and 10.2; update 18.6; change People & Culture to Human Resources, minor editing	Melissa Saxby

25 APPENDICES

Appendix 1 – InvoCare Conduct Statements

Appendix 2 – Code of Conduct Q & A Whistleblower Policy

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APPENDIX 1 - INVOCARE CONDUCT STATEMENTS

Consider these statements as guidelines for following the Code of Conduct. As a workplace contributor, you will:

- 1. Always aim to provide excellence in service, both internally and externally, while you work and conduct yourself in accordance with the law and all InvoCare policies and procedures.
- 2. Work in a way that maintains and builds on the trust and confidence that our clients, communities and the general public have in InvoCare. You will meet or exceed their expectations of service.
- 3. Work in a safe, honest and competent manner.
- 4. Actively contribute to the creation and maintenance of a workplace free from discrimination, harassment and bullying.
- 5. Respect the emotional state, culture, ethnicity, values and beliefs of clients, colleagues and members of the public
- 6. Ensure that all information gathered and used to fulfil your role is complete, accurate and used in accordance with legal and organisational requirements (both during and after your employment).
- 7. Ensure that you provide accurate, complete and impartial responses to requests for information, products or services from clients, colleagues or members of the communities in which we work.
- 8. Disclose, and take reasonable steps to avoid any real, potential or perceived conflict of interest.

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APPENDIX 2 – QUESTIONS, ANSWERS AND EXAMPLES

General Questions

Q I have a concern that isn't specifically covered in the Code of Conduct. Does that mean that there is no problem?

A No. It is not possible to list every possible situation in the Code of Conduct. If a situation arises and you are unsure, you should also use your understanding of the Policies and Procedures of the business as well as your sense of right and wrong as a guideline. Talk to your Supervisor or Manager, or call Human Resources if you have a question or concern that is not specifically addressed in the Code of Conduct. It is important to seek clarity if you have a concern rather than assume there is no problem at all.

Q When I am arranging a funeral or memorial for a family, sometimes I am asked by them to process the paperwork quickly. This means that I sometimes have filled in the client's signature on some documentation to get things moving. I am working under the family's instruction, so that's OK isn't it?

A If it's against the law and/or InvoCare Policies and Procedures, then no, it's not OK.

Our operational procedures are in place to ensure that you comply with laws and regulations. It is tempting to take short cuts to meet our clients' expectations; however, it is not acceptable to do so.

Work Health & Safety

Q We have strict procedures for the use and storage of chemicals in my work location, including wearing PPE and frequently cleaning down surfaces and equipment. This takes a lot of time. We've all been doing our jobs for years, know how to take short cuts and have never had an accident or spill. This is OK if we take care, isn't it?

A Taking care is important, and it is not OK to take shortcuts. Operational procedures are not only designed to comply with laws and regulations, they are designed to protect you and your colleagues from harm. It is unacceptable to breach any procedure, and anyone found to have done so will be subject to the disciplinary process.

Harassment

Q My Manager occasionally tells 'Asian' jokes in the office. No-one in our location is Asian and some of the jokes are kind of funny. No-one seems to be offended. Is there anything wrong with this?

A Yes, there is; your Manager's behaviour is unacceptable. You must tell your manager that their behaviour is inappropriate and ask them to stop telling these jokes at work. If you aren't comfortable speaking to your manager about this, you must contact their manager or Human Resources.

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Q I have worked in the funeral industry for several years and I think that people in this industry need to be very caring and open about their feelings and willing to express them. I sometimes tell my less experienced colleagues that they should always attempt to personally connect with and comfort their clients and colleagues when they seem upset. Surely there isn't anything wrong with this?

A You must always act in a professional way towards our clients, your colleagues and members of the public. This requires that you exercise judgement in how you interact with others, particularly in situations where they are exhibiting strong emotions.

Sexual Harassment

Q Michele's supervisor tells Michele sexually offensive jokes and comments on her appearance in a way that makes her uncomfortable. She asks him to stop, but he laughs and tells her he's "just kidding around." Michele wants to report this but fears her supervisor will know she did so and block her doing any extra shifts or overtime. What should she do?

A Michele should report the situation to another manager or People & Culture or any of the resources listed. InvoCare will take all reasonable steps to protect her from any retaliatory acts, including extra shifts or overtime or any other form of mistreatment due to her report and will take the necessary actions to ensure that she can work in a harassment-free environment. We all have the right to work in a safe and positive workplace, and InvoCare will work to ensure this goal is achieved.

Social Media

Q One of my colleagues has a slightly 'odd' sense of humour and sometimes posts comments on Facebook about working in the Funeral Industry. It's not a work page and he doesn't mention people by name. Is there anything wrong with this?

A Use of Social Media (business-related or personal) such as Facebook, Twitter etc. by employees should be able to withstand public scrutiny and/or disclosure, with no negative reflection on InvoCare or on any of InvoCare's brands. All use of Social Media should also be in conjunction with the relevant InvoCare policy.

Conflict of Interest

Q My Regional Manager (RM) has just told us that the cleaning of all the locations in her region will now be provided by the company that her sister and brother-in-law own. As far as I am aware my RM didn't make the final decision to engage them. Has she done the right thing?

A If you know that your Regional Manager disclosed the relationship to the person who made the decision, there is no need for any further action. If you know that the relationship wasn't disclosed or if you are uncertain, then you should first raise the matter with your RM. If you are not comfortable doing this, then you should discuss it with the decision maker.

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Q It is my job to select a supplier for the Company. One of the suppliers being considered is a company owned by my close friend. Do I need to take precautions?

A In this situation, your interest could appear as a conflict, as it is your job to select the best supplier for InvoCare. You should consult your manager and the Compliance Officer. The best course of action is either for you to not be involved in the selection process, or for your friend's business to be eliminated from consideration.

Fair Employment Practices

Q Lisa is a manager and needs to make a promotion decision. She thinks that, since Herbert is 55 and nearing retirement age and Iris is only 35, that she may stay with InvoCare for more years. Lisa thinks it would be wise to promote Iris even though Herbert has all the experience required for the promotion. Lisa would require some training and coaching for the role, but she's younger and will be with us longer than Herbert. Is this a good employment decision?

A No. Lisa is making this decision solely based on age, and this is never acceptable.

Bribery

Q A public health official has arrived at our mortuary. May I offer something of value to the inspector as a sign of good will?

A No. You should never give anything of value to any official. Giving anything of value to the health inspector would be perceived as a bribe intended to influence the inspector's review of the facility.

Insider Trading

Q I have learned that the Company is considering the acquisition of a small, publicly listed funeral company. May I acquire the stock of this company in anticipation of the acquisition?

A No. Trading on material non-public information is illegal and a violation of the Code, whether you are trading in the stock of InvoCare or the stock of the other Company.

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