



Code of Conduct

1. Purpose and Objective
 - a. The Board and Executive Team at LogiCamms are committed to promoting a high standard of corporate responsibility and sustainable business practices.
 - b. This Code of Conduct (Code) specifies the standards of behaviour for employees, consultants and subcontractors (“Employees”) and is reflective of how we conduct ourselves in the performance of our roles.

2. Our Charter

[Company Charter](#)

MANAGING BUSINESS

3. Confidentiality and Security
 - a. Peers and Colleagues: We recognise our relationships with our peers and colleagues will lead to the sharing of business and personal information. All information gained or shared in this way must be respected and treated with confidentiality during and after an Employee’s employment period and with consideration for the rights and expectations of others.
 - b. Clients: We will ensure any contractual or proprietary information held by us in any form pertaining to our clients (past, present or potential) will always remain confidential and will not be disclosed to other parties without the permission of both LogiCamms and the relevant client.
4. Financial Reporting and Risk
 - a. If employees are involved in the financial reporting process during their employment, they must exercise diligence and good faith in the preparation of information, ensuring it is accurate, timely and that it represents a true and fair view of the performance and state of affairs of LogiCamms.
 - b. LogiCamms must maintain accurate and reliable records and reports in relation to financial, accounting and internal controls in place.
 - c. All Employees accept that understanding and managing risk including fraud is fundamental to the business of LogiCamms.
 - d. Employees will ensure that business risks are identified, assessed and managed so as to minimise the impact on LogiCamms Employees, Contractors and LogiCamms’ clients.

5. Use of Company Information and Communication Systems

- a. LogiCamms allows reasonable personal use of phones and computer systems, but it is important to consider what information is shared using LogiCamms systems and how often it is used for personal reasons.
- b. At no time can LogiCamms' information and communication systems be used to view or send illegal or inappropriate material. This includes pornographic or sexually explicit material, illegal activity such as the purchase of illicit drugs or services, or material that promotes violence, hatred, terrorism or discrimination.
- c. This requirement applies regardless of the location or the time the systems are used.

6. Conflicts of Interest and Intellectual Property

- a. Employees may not hold a material interest or act as a director, officer or employee for any competitor, customer or supplier to LogiCamms without prior written approval from a member of the Executive team.
- b. Employees must remove themselves from any decision making process for a supplier if they or a family member have an interest in the outcome.
- c. Employees may not use LogiCamms' funds, equipment or intellectual property to benefit personal or business interests outside of LogiCamms without the prior written approval of a member of the executive team.
- d. Employees must be respectful of the other parties' intellectual property while working with LogiCamms. Use of intellectual property from others such as a client's logo in proposals or marketing materials, should only be made with prior consent of the third party.

7. Insider Trading

- a. Employees understand that during the course of their employment with LogiCamms, they become privy to "insider information" as defined under the ASX Listing Rules. Under the Listing Rules, a person must not trade in any listed company securities if they have information, which has not been disclosed to the market and which may impact the price of that security.
- b. Insider trading is illegal and there are severe regulatory penalties if convicted.

8. Anti-Competitive Practices

- a. Employees understand that price fixing or agreeing with a competitor to fix a price is illegal, including under the Competition and Consumer Act, and there are severe regulatory penalties if convicted.
- b. Employees must ensure they do not engage any activity to set prices, share formulas, agree not to compete in markets or engage in any conversations with our competitors that may be viewed as anti-competitive behaviour.

9. Bribery and Corruption

- a. LogiCamms and its Employees will abide by all applicable local, national and international laws in all the countries we operate in.
- b. Bribery of any kind to any person is prohibited.
- c. LogiCamms recognises that in some situations Employees may have a bribe demanded from them. LogiCamms supports any Employee walking away from a business transaction where they feel they are being extorted.

10. Gifts, Entertainment and Hospitality

- a. Employees will not offer or accept gifts, entertainment or other benefits that could affect their ability to make decisions on behalf of LogiCamms objectively, fairly and without bias.
- b. Employees are required to declare any gifts, entertainment or hospitality in excess of \$200 of value to their manager and receive consent from a member of the executive team before accepting.
- c. Employees should not offer any gifts, entertainment or hospitality of any kind to clients or suppliers while we are in negotiations/tender process with them.

11. Safety

- a. Each employee has the responsibility and accountability to work safely.
- b. Each Employee must work within their areas of competence and authorisation.
- c. Each Employee must identify, assess, manage and communicate hazards in the workplace.
- d. Each Employee must report incidents, hazards and near misses.
- e. Each Employee must not be impaired by the consumption of alcohol or other drugs when performing work for the Company.
- f. Each Employee must present themselves for work appropriately attired, and shall maintain an acceptable level of cleanliness and fitness for work.
- g. Each Employee must comply with the applicable Permit to Work & Isolation procedures where required.
- h. Each Employee must always wear and use mandatory Personal Protective Equipment (PPE).

MANAGING EMPLOYEES

12. Professionalism

- a. Employees must show care and respect for their peers, managers, clients, contractors and other people.
- b. Employees must adopt positive methods of communication at all times while maintaining an awareness and consideration for professionalism, personal accountability, right to privacy, punctuality, seniority, expertise and diversity.
- c. LogiCamms supports and encourages a workplace that is free from discrimination, harassment and violence.

13. Employees

In managing our employees, LogiCamms will endeavour, so far as is reasonably practicable, to do the following:

- a. Provide a safe and healthy working environment.
- b. Promote opportunities for Employee job satisfaction and career development.
- c. Provide for remuneration that is fair and reviewed at appropriate times so that performance is rewarded appropriately.
- d. Promote equal opportunity for all Employees.
- e. Provide Employees with the training, resources and support necessary to competently perform their roles.

COMMUNICATIONS

14. Media

- a. As a publicly listed company, LogiCamms is responsible to its shareholders, the community, employees, regulators and other stakeholders and to uphold these responsibilities our public statements should only be made by an approved company spokesperson, in accordance with the Company's Communications Policy.
- b. If Employees are approached by the media for comment, they should refer the query to Director Corporate Development.
- c. Information that could impact the share price of LogiCamms should be communicated through the Director Corporate Development. This includes all announcements about the company's performance and prospects.

15. Share Market

- a. Only the Company Secretary is authorised to disclose information to the Australian Stock Exchange regarding LogiCamms.
- b. Employees should be aware that any information that could impact the share price of LogiCamms should not be communicated internally until clearance has been given by the Company Secretary.

16. Social Media

- a. All Employees are personally responsible for content they publish in any form of social media. Employees should not speak on behalf of LogiCamms unless they have been authorised to do so in accordance with the Company's Communications Policy.
- b. Employees should ensure their interactions on social media are polite, respectful, accurate and do not include confidential information.

CONSEQUENCES

17. Breaches of this Code

- a. Employees must abide by this Code and understand that breaches may result in disciplinary action including termination.
- b. If the situation involves a breach of legislation, the matter may also be referred to the appropriate agency for enforcement of the legislation.
- c. If an Employee suspects the occurrence of a breach of the Code they must immediately report the matter to their HR Team Member.
- d. Any matter raised will be investigated by the HR or Executive Team as appropriate.

18. Whistle-blower Protection

- a. LogiCamms will properly investigate any complaint by a whistle-blower about a breach of this Code or any other legislative obligation using the current whistle-blower procedure.
- b. LogiCamms will comply with the whistle-blower provisions of the Corporations Act 2001 or the Australian Securities and Investment Commission Act 2001, related regulations any other related legislation. LogiCamms will also abide by any whistle-blower provisions in overseas jurisdictions we operate in.



Flora Furness
Chief Executive Officer
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