

# Superloop Code of Conduct

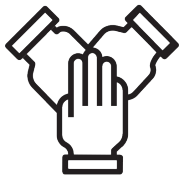
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July 2020



# Our Values

Our values are important to us. They are the fundamental beliefs which guide our behaviour and actions. Superloopers are expected to act in accordance with these values, and the best interests of Superloop, at all times.



## Be Collaborative

We embrace diversity and the contribution every one of us can make to get the job done. We create environments that are founded on effective communication, collaboration and empathy. We recognise that we collectively make up the culture we work in every day and that we are only as strong as our weakest contributor.



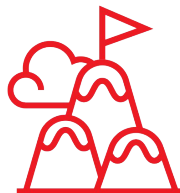
## Be Excellent

We act on well thought out direction and purpose. We adapt as situations require and use teamwork and initiative to do so. We measure our outcomes and we never settle for good when we can be excellent.



## Be Accountable

We care about what we do. We empower each person to do their jobs, but we hold ourselves accountable - particularly when we get it wrong. We understand that there's no one in the passenger seat - every decision has a consequence, and it's our collective and individual responsibility to get stuff done, properly and with commitment.



## Always Improve

We champion change as we want to better ourselves and the business. We are all about continuous learning, breaking down walls, and being better at what we do - both individually and as a team. We have small business agility and we thrive on being the challenger. We give and take on feedback because we aspire to be awesome.

# Our Values in Action

## We act in the best interests of Superloop and our shareholders

We acknowledge that we must always act in the best interests of Superloop and our shareholders. While this might seem a narrow focus point, we do so because we recognise that these interests are tightly aligned with other stakeholders - our employees, our customers, our suppliers and the communities we operate within. The interests of each of these groups are aligned and satisfaction of one will contribute to satisfaction in another.

### How do we do this?

- We make well informed decisions. We rely on data and ensure we understand the implications of our actions before we make a decision.
- We are open to being challenged by our peers and we are mutually respectful when it happens.
- We create long term shareholder value by ensuring their interests are considered in all of our decisions.
- We provide our investors with accurate and timely access to price sensitive information and we make sure we comply with our obligations in relation to continuous disclosure.
- We actively manage, review and discuss our risk profile on an ongoing basis. We ensure relevant stakeholders have complete transparency and feel comfortable challenging our position in regards to risk.

*We act in the  
best interests of  
Superloop  
and our  
shareholders*

# Our Values in Action

## We act with honesty and integrity

We will always tell the truth in everything we do. Acting with honesty and integrity is paramount to meeting expectations as a Superlooper. Anything else is not OK. We don't believe in gifts to influence the outcome of a business decision, sale or process - we won't give them out and we won't accept them. Superloopers will not be involved in fraud or bribery of any form at any time. No exceptions.

### How do we do this?

- Where a gift is accepted - for any reason - it will be disclosed in accordance with our policies and procedures. If the gift is intended to influence a business outcome, we will politely refuse it.
- We will ensure that we comply with anti-bribery laws as they apply in the jurisdictions we operate. To do so, we will ensure that our understanding of these laws is always accurate and current.

*We act with  
honesty  
and  
integrity*



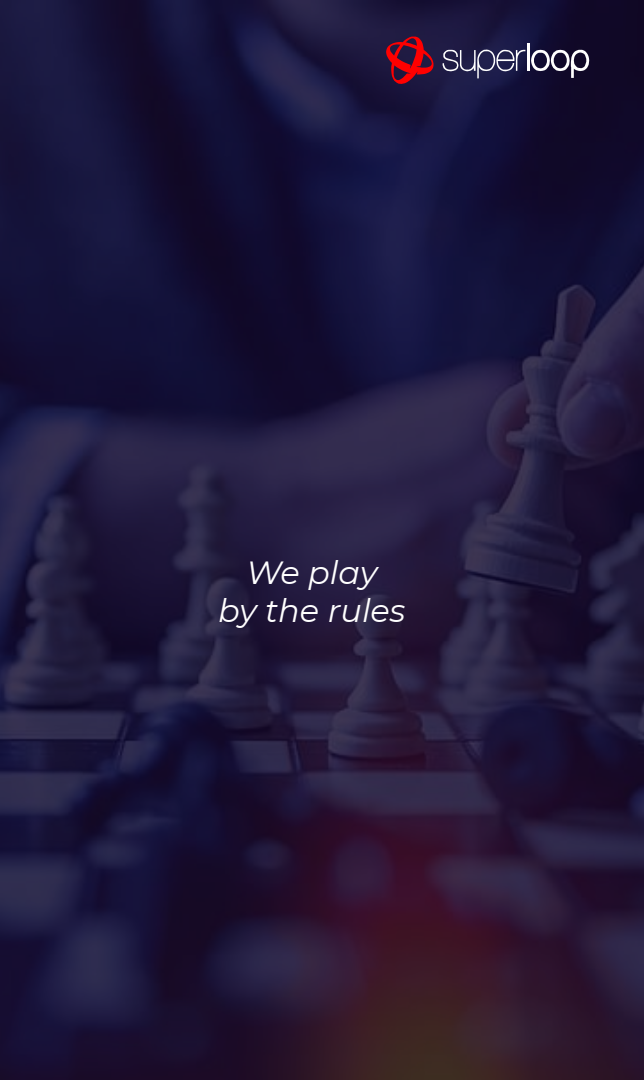
# Our Values in Action

## We play by the rules

As Superloopers we play by the rules at all times. Our operations are multi-jurisdictional and therefore our compliance landscape is complex. We make sure we are familiar with the laws and regulations in the geographies we operate in and then we work within them. As a publicly listed company, we recognise that there are additional responsibilities imposed on us as a company, and on individual Superloopers. Specifically, we acknowledge that insider trading is unacceptable and is considered to be a criminal act.

### How do we do this?

- We spend time understanding the legal and regulatory frameworks within which we operate.
- We comply with all laws and regulations that are imposed on Superloop as a Company, or on individuals.
- We make sure we know when it is and isn't OK to trade in Superloop shares. When trading is OK, we put in place measures to make sure it is conducted appropriately.
- If in doubt, we ask for help from our internal and/or external legal resources.

A dark, artistic photograph of a chessboard with several white chess pieces. A hand is visible on the right side, holding a white king piece. The lighting is dramatic, with strong highlights and deep shadows.

*We play  
by the rules*

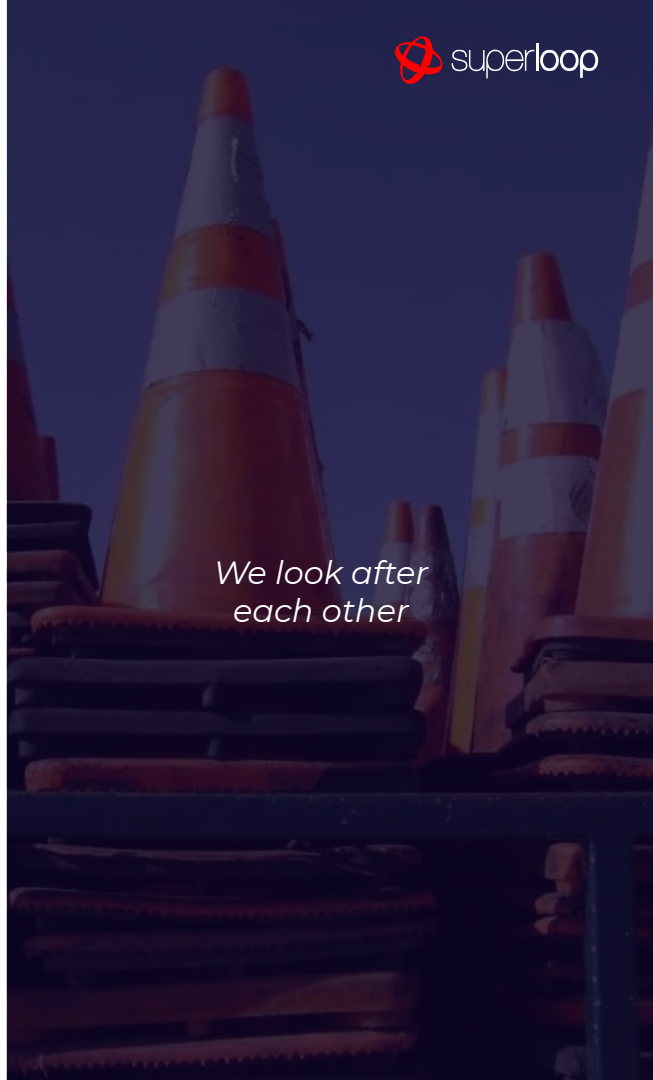
# Our Values in Action

## We look after each other

Superloopers should feel safe in their work environment. Not just physically, but emotionally and mentally as well. Everyone has a role to play in making our environments safe and we expect this responsibility to be taken seriously. Many of our operational teams are field based and are exposed to a higher level of physical risk as a result. We must ensure Superloopers are provided with the appropriate support and resources to do their job safely.

### How do we do this?

- We set clear expectations in relation to acceptable behaviour. We expect everyone to lead by example, not just our leaders.
- When people don't act in accordance with our expectations and policies, we appropriately hold them accountable or raise it to our manager or the P&C team.
- We have channels that enable people to report wrongdoing in the workplace without fear of victimisation.
- We maintain frameworks and tools to encourage safe systems of work and hold people accountable for contributing to these tools.

A photograph of several orange and white traffic cones stacked on a metal surface, with the text "We look after each other" overlaid in white.

*We look after  
each other*

# Our Values in Action

## We play fair

As Superloopers we play fairly at all times. We value competing in a fair environment and we treat others - suppliers, competitors, customers, our employees and other stakeholders - fairly and with respect at all times.

### How do we do this?

- Whilst we see ourselves as a challenger, we are also larger than other companies. We will not use this unfairly to our advantage in our dealings with suppliers and customers.
- We recognise that we can work alongside our counterparts and competitors to improve the industry we operate within.
- We value the contributions made by Superloopers and will never take advantage of a perceived or real position of power we have as their employer.

A close-up, high-contrast photograph of numerous dice, primarily in shades of red and purple, creating a textured, patterned background. The dice are scattered and overlapping, with some showing different faces.

*We  
play fair*

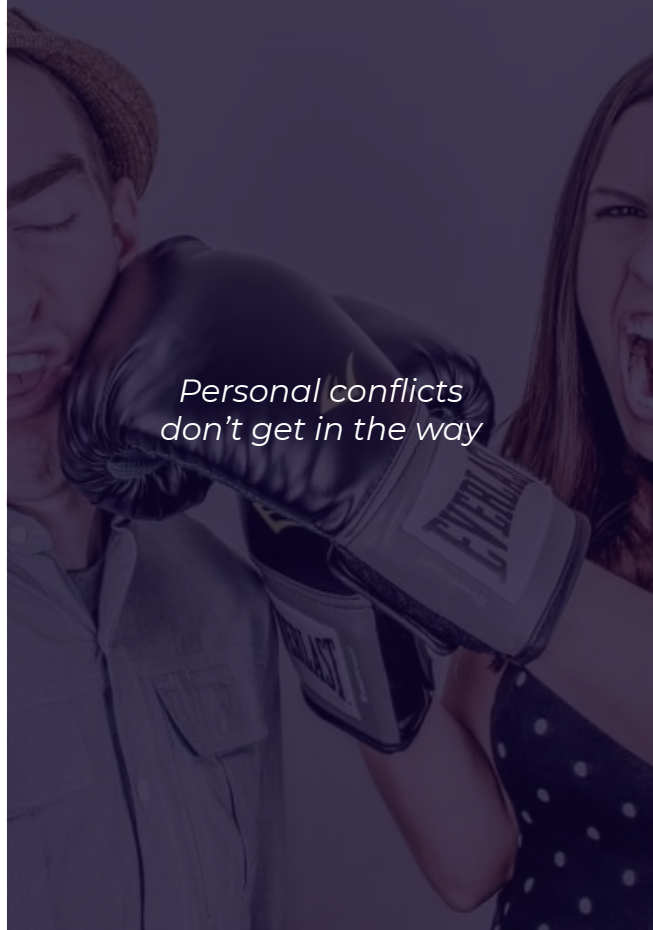
# Our Values in Action

## Personal conflicts don't get in the way

We recognise that there are times when a Superlooper may find their, or another person's, personal interests conflicting with business interests. When this occurs, we must ensure the conflict is managed in accordance with our Conflicts of Interest Policy.

### How do we do this?

- Where a potential or real conflict is identified, it will be disclosed as soon as practically possible and before any decisions are made that could be impacted by the conflict.
- When there is a conflict that can't be avoided, we must ensure it is managed in accordance with our Conflicts of Interest Policy.

A background image on the right side of the slide showing a man and a woman wearing boxing gloves, appearing to be in a boxing stance or fight. The image is dark and semi-transparent, serving as a background for the text.

*Personal conflicts  
don't get in the way*



# Our Values in Action

## We use our resources appropriately

We expect all Superloopers to use our resources appropriately and for work purposes only. Additionally, we also expect Superloopers to, where appropriate, take actions to protect our resources.

### How do we do this?

- We use technology in a responsible manner and do not attempt to access, store or share inappropriate, offensive or illegal material.
- Whilst some personal usage is acceptable, it cannot impact on our ability to do our job and must always be in accordance with our policies and procedures.
- If we notice use of resources for personal gain or that is not in the best interests of Superloop, we will report it.

A close-up, slightly blurred photograph of several colorful markers (red, blue, green, orange) lying on a surface, serving as a background for the right side of the slide.

*We use our  
resources  
appropriately*

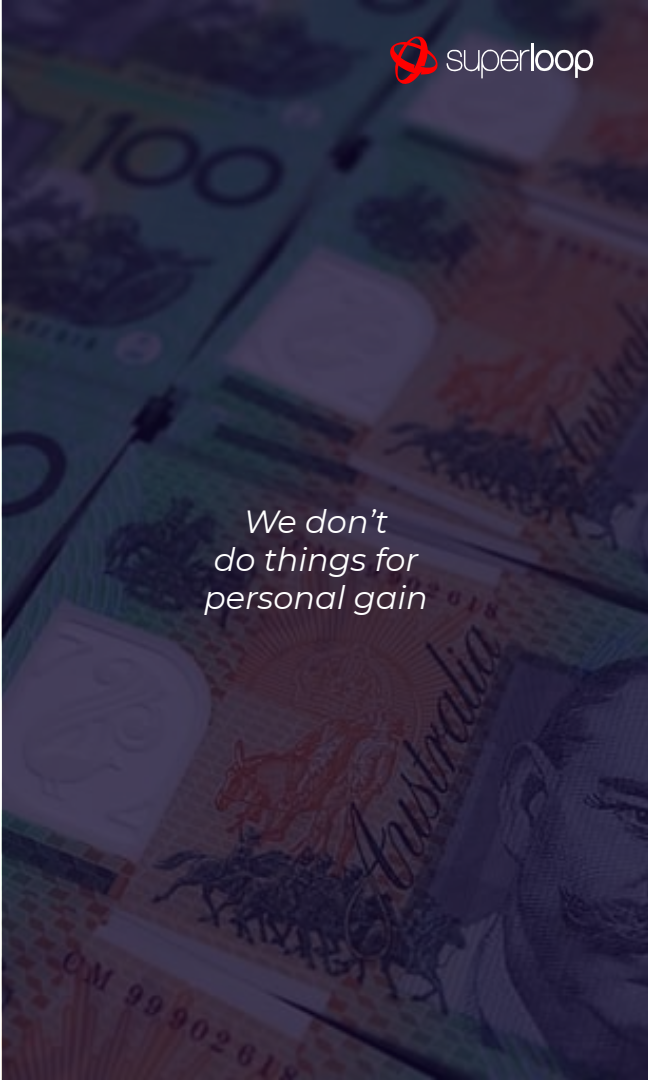
# Our Values in Action

## We don't do things for personal gain

Superloopers are remunerated for their contributions to the Company. However Superloopers should not seek any personal gain in addition to this, especially by virtue of the position they hold. Superloopers will never accept personal gifts or favours to influence the outcome of a business decision, sale or process. At all times, our actions must be for the betterment of Superloop, and not for individual gain.

### How do we do this?

- We politely decline any gifts offered to us which are intended to influence the outcome of a business decision, sale or process.
- When making decisions, we make them in the best interests of Superloop, not personal interests.
- If we notice someone prioritising personal gain over the best interests of Superloop, we will report it.

A dark, semi-transparent background image showing a close-up of Australian currency, including a 100 dollar note and a 50 dollar note, with the word "Australia" visible.

*We don't  
do things for  
personal gain*

## Code Breaches

All of our employees and contractors are expected to comply with the provisions of this code, and any Superloop policies and procedures. Failure to do so may result in disciplinary action, including termination of employment.

Breaches of the code can be reported to your manager, a member of the P&C team or the Company Secretary. In the case of a Director, breaches should be reported to the Chairman of the Board, and any breach of the code by the Chairman should be reported to the Chair of the Audit Committee. The Board will be informed of any materials breaches of Code.

## Review

This Code will be periodically reviewed to ensure it is operating effectively and identify any changes that need to be made. The review will be conducted by the General Counsel & Company Secretary in consultation with the Group Head of People & Culture. Any changes to the Code will require approval by the Superloop Board.

Thank You

