



Code of Conduct.

Updated February 2025

A message from the Managing Director / Chief Executive Officer.

Superloop exists to unleash the unlimited possibilities of the internet. Our golden rule is to always, always start with the customer experience in mind. No matter what our role is at Superloop, we take accountability for our own decisions and actions, and with that principle to guide us, we're always going to deliver the best outcome.

At Superloop, we focus on the positive. Everyone working in Superloop should expect to be treated, and must treat others, with respect, dignity and fairness. We should not need to say this but to be really clear in particular, we do not tolerate bullying and/or harassment. This Code of Conduct seeks to create an environment which enables every Superlooper to fulfill their potential by providing the basis of a positive workplace culture – a culture which reflects our core values of Unleash Possibilities, Start with the Customer, and Win Together.

We strive to continually drive a culture of compliance and accountability to enable us to deliver the best quality services to our customers through our commitment to the principles which we value and lead with every day.

While this Code of Conduct does not and cannot address every issue of conduct or ethics that may arise, its principles should point to an answer.

I ask every Superlooper to make themselves aware of the Code of Conduct, and to implement and support the Code's provisions and Superloop's core values on which it is based.

Paul Tyler

Managing Director & Chief Executive Officer



Introduction.

At Superloop (Superloop Limited ACN 169 263 094 and, as the context requires, its controlled entities and affiliates) we require all our Directors, Employees and Contractors (collectively referred to as "Employees") to uphold the highest standards of ethics, integrity, and behaviour when interacting with each other, our customers and other stakeholders.

The purpose of the Code of Conduct (**Code**) is to provide a framework to define and promote ethical day-to-day conduct and decision making. It outlines the values we uphold, and the standards of behaviour expected of our Employees.

Through this framework, we are committed to deliver quality service to our customers. No matter what our role is at Superloop, we base our decisions and our actions on what matters most for our customers, and we will always take accountability and own our decisions and actions.

Cultural Values and Behaviours.

WHY ARE VALUES IMPORTANT?

Superloop's Purpose, Ambition and Cultural Framework help Employees understand "**what**" we are trying to achieve at Superloop. Our Values, help us understand "**how**" we will go about achieving this. They highlight what is important and underpin all that we do. When our values are brought to life through the behaviour of our Employees, we have the ability to create a positive, strong culture at Superloop.

Employees need to live by these values in everything they do.

The three core principles of Superloop's Cultural Framework are: Unleash Possibilities, Start with the Customer, and Win Together. These principles and the values that support them, set the standard and drive all decision making, habits and behaviours at Superloop.

OUR CULTURE FRAMEWORK

Unleash Possibilities

Think differently
Speak up
Move forward with speed

Start with the Customer

Do what matters
Make the complex simple
Own it

Win Together

Lead by example
Encourage every voice
Unify the team

Employees are expected to act in accordance with these values, and the best interests of Superloop at all times.

WHAT IS EXPECTED OF EMPLOYEES?

Every Employee is expected to behave in accordance with the principles and values. These principles serve as a guide for behaviour and decision making. Through behaviours, decisions and choices, Employees can all impact Superloop's culture. It's not only the individual behaviour that matters; it's also the behaviours Employees accept from others which sets the tone for the culture at Superloop.

How do Employees keep the values alive?

- Live and breathe the Cultural Framework.
- Hold themselves, their peers and their teams, accountable for behaviours, decisions and choices.
- Recognise people who are living the values in big and small ways.
- Utilise the values to influence decision making.
- Get involved by sharing their feedback and suggesting ideas to bring the values to life.

Ethical Conduct.

In addition to the Superloop Cultural Framework, there are fundamental standards of conduct expected of everyone at Superloop. Employees acknowledge that they must always act in the best interests of Superloop and its shareholders, as we recognise that these interests are closely aligned with other stakeholders – Superloop's customers, suppliers, regulators and the communities in which we operate. The interests of each of these groups are aligned and the satisfaction of one contributes to the satisfaction of another.

At Superloop, Employees must always:

- Behave honestly and with integrity;
- Act with care and diligence;
- Treat others with respect and courtesy, and without coercion, bullying or harassment.
- Treat customers experiencing vulnerability, including victims survivors of domestic and family violence, with empathy and support;
- Comply with all applicable laws;
- Comply with lawful and reasonable directions given;
- Disclose and take reasonable steps to avoid any conflict of interest (real, potential or perceived) in connection with their employment;
- Use Superloop resources in a proper manner;
- Act objectively, impartially and free of conflicts of interest in the conduct of their duties; and
- Behave in a way that upholds Superloop's values and the good reputation and integrity of Superloop.

Employees will not:

- Solicit or accept anything of value from a customer or client that might influence how we conduct our duties and responsibilities; and
- Make improper use of inside information, or our duties, status, power or authority in order to gain, or seek to gain, a benefit or any other form of advantage for ourselves or any other person.

For more relevant information, please refer to the [Anti-Bribery and Corruption Policy](#).

Ethical Decision-Making.

If in doubt, Employees should ask the following questions to determine whether an action or decision is ethical:

Why is the action being taken or the decision being made?

- Is there authority for the action or decision?
- Is the action or decision consistent with the job role and accountabilities?
- Is the action or decision consistent with Superloop's compliance obligations?
- Is the action or decision based on facts, assumptions or generalisations?
- Is the action or decision consistent with Superloop policies, Superloop's objectives and this Code
- Will the action or decision result in confidential information being made public?
- What will be the outcome for all parties involved?
- Is there a conflict of interest against Superloop?
- Will there be a personal benefit, including for family and friends?
- Has the action or decision been made expeditiously where the impacts and outcomes are not well known?
- Are there other alternative options that would create better outcomes for all parties involved?
- Will the supporting evidence confirm the merits of the action or decision?

How do Employees do this?

- Make well informed decisions by relying on the feedback from other Employees, data, experience and knowledge to ensure they understand the implications of their actions before making a decision.
- Take end-to-end ownership and remain open to being challenged by their peers
- Create long-term shareholder value by ensuring their interests are considered in all decisions.
- Actively manage, review and discuss the Company's risk profile on an ongoing basis, ensuring relevant stakeholders have complete transparency and feel comfortable challenging their position regarding risk.

More information can be found in the [Conflicts of Interest Policy](#).

Respect for the Law.

Employees demonstrate respect for the law by complying with all applicable Australian and foreign laws as directed. For the avoidance of doubt, if this Code inadvertently conflicts with a law, the law will take precedence.

How do Employees do this?

- Spend time understanding the legal and regulatory frameworks within which Superloop operates, including those most relevant to their role and activities.
- Comply with all laws and regulations that apply to Superloop as a Company, or to individuals.
- Ensure they know when it is and isn't acceptable to trade in Superloop shares. When trading is permissible, they implement measures to ensure it is conducted appropriately.
- If in doubt, Employees should seek help from internal legal resources.

Sexual Harassment.

Employees should feel safe in their work environment, allowing them to attend work and to perform their duties without being subjected to any form of harassment, including sexual harassment. Superloop has zero tolerance for sexual harassment under any circumstances. It is the obligation of every Employee, at any level, to ensure that Superloop remains free from all forms of harassment, including sexual harassment.

How does Superloop do this?

- We set clear expectations in relation to acceptable behaviour. We expect everyone to lead by example, not just our leaders.
- When people do not act in accordance with our expectations and policies, we appropriately hold them accountable.
- 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.

Disciplinary action will be taken against any Employee or contractor who breaches Superloop's [Workplace Behaviour Policy](#).

For more relevant information, please refer to the [Whistleblower Policy](#) and the [Diversity and Inclusion Policy](#).

Harassment, Bullying and Discrimination.

Discrimination against others on the grounds of race, colour, sex, sexual orientation, age, physical or mental disability, marital status, family responsibilities, pregnancy, religion, political opinion, national extraction or social origin or any other ground is illegal.

Superloop is committed to ensuring a safe working environment for our Employees, which includes protecting them from psychological hazards in addition to physical ones. We treat each other and our stakeholders with courtesy and respect, are sensitive to the cultural backgrounds of others, and refrain from behaviour that is or could be construed to be harassment, whether sexual or otherwise. Unsafe and unacceptable behaviour including harassment, discrimination and bullying will not be tolerated. Employees are expected to report such behaviours, including anonymously if they choose to do so, through the Superloop Whistleblower Policy.

More information can be found in Superloop's [Whistleblower Policy](#) and [Diversity and Inclusion Policy](#).

Fraud.

Fraud is defined as dishonestly obtaining a benefit, or causing a loss, by deception or other means. There is a mental or fault element to fraud; it requires more than carelessness, accident or error, and can be committed by an internal or external party (including by way of collusion). Employees are remunerated for their contributions to the Company. However, they cannot seek any personal gain in addition to this, especially by virtue of the position they hold. Employees must never accept personal gifts or other forms of benefit that could influence the outcome of a business decision, sale or process, whether they be an actual, potential or perceived benefit.

How do Employees do this?

- Politely decline any gifts offered which are intended to influence the outcome of a business decision, sale or process.
- When making decisions, make it in the best interests of Superloop, not for personal gain.
- If someone is distinctly prioritising personal gain over the best interests of Superloop, Employees should report it to appropriate channels.

For more relevant information, refer to the [Anti-Bribery and Corruption Policy](#).

Conduct at Work Related Functions.

Superloop is a social workplace where interaction between Employees is encouraged. In this spirit, Employees will occasionally be invited to work-related gatherings and events where alcohol may be served. It is important to remember that even in a casual atmosphere, Employees have a duty to behave professionally and exercise good judgement at functions held either onsite or offsite. Those who fail to do so, or who bring Superloop into disrepute as a result of inappropriate behaviour will be held accountable under this Code.

Managers supervising or coordinating Superloop functions have additional responsibilities to be alert to and continually monitor escalating situations, as well as take steps to manage potentially inappropriate situations. It is the responsibility of managers to manage their teams at work functions. For this reason, it is strongly recommended that these individuals establish and communicate protocols for dealing with possible situations prior to the actual function.

Superloop strictly prohibits the use of illicit drugs at any time, including at any functions, on its premises or during other work-related events.

Conduct on Social Media.

Conduct on social media, whether on behalf of Superloop or as individuals in our own time, carries risks that may negatively impact Superloop if not managed properly. For this reason, apart from a limited group of Employees who have explicit permission to represent Superloop in social media forums, Employees should not comment on behalf of, or in the name of Superloop. When commenting or sharing information on a subject that could be construed as related to Superloop, Employees must disclose their professional relationship with Superloop and provide a clear disclaimer that their views are their own and do not represent those of Superloop.

Employees should always be mindful that the information they post or distribute on social media sites could be subject to public scrutiny.

Official Facilities, Equipment and Other Resources.

Superloop has several policies regarding the use of its facilities, equipment and other resources. If in doubt about which apply to you, you should speak to your manager about your role, responsibilities and the relevant policies.

The following is a summary of the responsibilities that apply to all Employees:

Employees must always:

- Use Superloop resources and assets (facilities, equipment, resources, and communication media, including email and the Internet) in a proper manner, and only in the performance of our official functions unless authorised by our managers (e.g. email and Internet may be used for personal purposes provided this use is limited, and does not compromise or appear to compromise our work performance).
- Discourage others from misusing resources and assets.
- Avoid waste or extravagance in the use of resources and assets.
- Look after the resources or assets under our care as if they were our own, including ensuring they are carefully maintained and not exposed to theft.

Consequences of breaching the Code.

Occurrences of any of the following will result in disciplinary action, including immediate dismissal and, where applicable, criminal prosecution:

- Theft, fraud, the taking of bribes or other dishonest conduct;
- Intentional breaches of law;
- Diminution in the ability or inability to perform work duties safely due to the influence of alcohol or recreational drugs;
- Intentional damage to Superloop's, a Superloop stakeholder's (eg. customers or suppliers) or another Employee's property;
- Acts or threats of violence in connection to Superloop;
- Threatening, bullying, intimidating or harassing Employees and stakeholders on or off workplaces;
- Grave misconduct either on or off duty that materially and adversely affects Superloop, a Superloop stakeholder or an Employee.;
- Using Superloop internet services to store, post or distribute material that is obscene, defamatory, threatening, discriminatory, harassing or hateful; and
- Failure to comply with work health and safety provisions.

Depending on all pertinent facts and circumstances (including the seriousness of the breach) the following may also be grounds for performance coaching and, possibly, disciplinary action:

- Failure to abide by Superloop policies or this Code;
- Negligence in the care or use of Superloop property or assets; or
- Inappropriate social media post or online activity.

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 Chief Legal & Corporate Officer / Company Secretary in consultation with the Group Head of People & Culture. Any changes to the Code will require approval by the Superloop Board.