

# Objective

CONNECTED. COLLABORATIVE. COMMUNITY.



# CODE OF CONDUCT.

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# CODE OF CONDUCT.



## PURPOSE

THE OBJECTIVE CODE OF CONDUCT HAS BEEN ENDORSED BY THE BOARD AND IS INTENDED TO PROVIDE GUIDANCE FOR DIRECTORS AND EMPLOYEES ON THE STANDARDS THAT OBJECTIVE EXPECTS IN THE CONDUCT OF ITS OPERATIONS.

## COMPANY VALUES

- We are one team;
- We take action to exceed our goals;
- We trust, respect and encourage each other, our customers and partners;
- We build and maintain effective relationships;
- We recognise and reward performance;
- We lead by example;
- We honour our commitments;
- We invest in our people;
- We enjoy what we do.

## PROFESSIONAL BEHAVIOUR

Objective is a good corporate citizen and complies with not only the letter, but with the spirit of the law, wherever it does business.

Objective is committed to fair competition. When competing for business, we do so vigorously but fairly. This means not intentionally misleading clients, business partners, competitors or the community, only using Objective's reputation in legitimate ways and refusing to participate in illegal market practices.

## INTEGRITY

As an Objective director/employee you are required to:

- respect customers and treat them courteously and consistently;
- respect colleagues and treat them fairly, openly and honestly;
- select vendors and suppliers in a manner consistent with Objective's best interests; and
- act in the best interests of all shareholders of Objective.

## CONFIDENTIALITY AND PRIVACY

All directors and employees are required to keep confidential, any information about the Company's business that is not publicly available. This is covered by Confidentiality Agreements, which are signed on commencement of employment.



## CONFLICT OF INTEREST

Conflicts of interest can arise if you have a personal interest in a business decision involving Objective. A personal interest can be direct or indirect and refers not only to you but also to members of your family and friends. Avoid situations in which your personal interests could conflict with those of Objective. If there is a potential conflict of interest, Objective's interests must always take precedence. If you have a conflict of interest, you must disclose this to your General Manager.

## OUTSIDE ACTIVITIES

You must not serve in any capacity – as director, partner, employee, consultant, agent, etc., - whether paid or unpaid, in any other company or business if there is a possibility that your personal interests could conflict with those of Objective without the express permission of the Objective CEO or Chairman.

## GIFTS AND ENTERTAINMENT

Gifts and entertainment should not be given or received if they could be interpreted as creating an obligation, affect your impartiality or objectivity.

Reasonable offers of entertainment such as dinner, theatre parties or sporting events may be accepted or offered.

In determining what is "reasonable" the onus is on you to consider not only the value of the gift or entertainment, but the frequency with which they are offered and the circumstances in which they are offered.

If in doubt, consult your Manager.

## EQUAL OPPORTUNITY

Objective is an equal opportunity employer. Objective strives to ensure that all employees and potential employees have an equal opportunity to be recruited and to succeed within the organisation. Discrimination or harassment of any kind will not be tolerated.

Objective is committed to maintaining a work environment free of sexual and other forms of harassment. Objective regards harassment as a serious matter.

## LEGAL COMPLIANCE

You must carry out your work according to the law.

## HEALTH SAFETY AND SECURITY

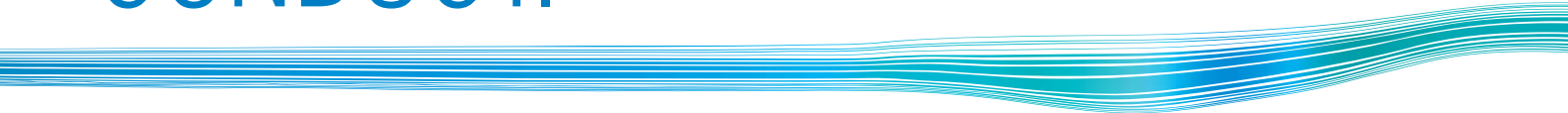
You must follow Objective safety and security procedures as detailed in Objective's Occupational Health and Safety program located in the Quality Management System.

Objective is committed to ensuring the health, safety and well being of all directors, employees and visitors. To assist us we expect that at all times whilst at work you will act in a safe manner. Whenever you see anything that you think is unsafe, please report it to your manager immediately.

Objective does not permit smoking in any Company premises.

When visiting clients you are expected to observe any of their rules or policies concerning health, safety and security.

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## DRUG AND ALCOHOL MANAGEMENT

Objective is committed to promoting and managing a safe workplace by preventing or minimising the risk of inappropriate behaviour and harm associated with alcohol and drugs.

Illicit drugs will not be tolerated under any circumstances. Prescription drugs are only to be taken as prescribed, while they do not impair the ability to work safely.

You will present for work free from the adverse affects of alcohol or drugs ensuring you do not present a health and safety risk. You must take responsibility to drink responsibly and safely at Objective related functions.

## USE OF COMPANY PROPERTY

Within reason, the limited use of computers, telephones and stationery for private purposes is acceptable, provided they are not used for private income producing purposes. Objective reserves the right to prohibit or restrict the use of its resources.

Whether or not Objective resources are being used for Company or private purposes it is incumbent upon you to use such resources efficiently, economically and carefully.

## COMPANY FUNDS

Where your duties require Objective funds to be spent, it is your responsibility to exercise good judgment to ensure that Objective receives appropriate value for the expenditure. Theft or fraud will be grounds for instant dismissal. If you become aware of any evidence that Objective funds are being used in a fraudulent or improper manner you should immediately and confidentially advise your Manager, a member of the General Management team or the CEO.

## USING THE INTERNET AND OTHER EXTERNAL ON-LINE SERVICES

Access to External On-line Services, including the Internet, as provided by Objective, is provided for company use.

Users of External On-Line Services are expected to maintain ethical and professional standards in all communications transmitted or downloaded over such services.

No offensive material is to be stored or displayed or forwarded.





## DISCOVERIES AND INVENTIONS

As detailed in your employment contract, any invention shall be fully, freely and immediately communicated by you to the Company and all rights, title and interest to any such invention shall be the sole property of Objective. Where an invention has entered the public domain or the Company has relinquished authorship rights this fact shall be fully, freely and immediately communicated by the Company to you.

## COMMUNICATION AND HANDLING THE MEDIA

Objective strives to achieve complete, accurate and timely communications with all parties with whom it conducts business, government authorities, the public and employees.

Other than the CEO, directors and employees should not talk to the media about the Company. Confidentiality of board discussions and company business must be maintained. All media should be referred to the CEO or General Manager of Marketing.

## INSIDER TRADING

Directors and employees must not utilise their position for personal gain or for gain of another person. All of us must ensure that any information in our possession that is not publicly available and may have a material effect on the price or value of Objective's shares is not provided to anyone who may be influenced to subscribe, buy or sell shares.

Directors and employees may buy or sell the Company's shares but are prohibited from dealing in the Company's shares when they are in possession of price sensitive information relation to Objective which is not generally available to the market or during black out periods. A black out period is imposed so as to avoid any adverse inference being drawn of unfair dealing. Therefore directors and employees must not buy or sell the Company's shares between the following periods, unless approved by the Chairman:

- From 1 June through to release of the full year results to the ASX.
- From 1 December through to release of the half yearly results to the ASX.

## POLITICAL SUPPORT

Objective will not make contributions of any kind to political parties or candidates. Objective recognises your right to personal participation in the political process and will not influence your activity provided there is no disruption to workplace activities. Individuals must take care that their views are not identified as those of the Company.

## RESPONSIBILITY FOR THE ENVIRONMENT

Objective is committed to protecting the environment in conduct of its operations. We will comply with environmental legislations and respect the environment making full and proper use of materials, recycling and avoiding waste. We seek to minimise our carbon footprint and be responsible environmental citizens.

# CODE OF CONDUCT.

## CODE OF CONDUCT CHECK

Our Code is one of a number of elements supporting a self-regulatory approach to the way we do business. The Code is designed to provide practical assistance in performing our daily tasks and resolving situations, which may present potential ethical conflicts. While the Code provides a number of specific examples and guides regarding ethical conduct and decision making, the following simple questions or steps will assist each of us in determining whether a decision or action creates an ethical dilemma or breaches the Code.

1. Is the decision or conduct lawful?
2. Is the decision or conduct within the meaning or spirit of our values and the Objective Code of Conduct?
3. Is the decision or conduct consistent with Objective's policies and procedures?
4. Will the primary beneficiary of the decision or conduct be Objective?
5. Is the decision or conduct transparent and able to withstand public scrutiny?

While the answer to all of these questions should be YES, there will be times where the answer may seem a bit 'grey' or you are still not comfortable with the decision or conduct.

In these cases seek one or more of the following options:

1. Clarify the matter with your Manager;
2. Request instructions to be put in writing;
3. Document all actions, directions and conversations on the issue;
4. Seek advice from your Manager.

Objective will at all times honour and respect the culture and laws of any country in which we do business. Except in circumstances where to do so would cause cultural embarrassment or break the laws of the land, all Objective employees and representatives should apply the requirements of this Code in their international dealings.

Anyone who breaches this Code faces disciplinary action. This could include dismissal or legal action.

If you suspect a violation has occurred, report the matter to your line or General Manager. Any person who reports in good faith a suspected violation of this Code can do so confidentially and will not be subject to retaliation or suffer any recrimination for making the report.

## AUTHORISATION

This policy was authorised by the CEO and the Board.