

## EMPLOYEE POLICY

## CODE OF PROFESSIONAL CONDUCT

GLOBAL

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## TABLE OF CONTENTS

1. ORGANISATION COMMITMENT .....	3
2. ELIGIBILITY .....	3
3. CODE OF PROFESSIONAL CONDUCT POLICY .....	3
3.1 Responsibilities of Objective's Employees .....	3
3.2 Responsibilities of Objective's People Managers.....	3
4. CONFIDENTIALITY AND PRIVACY.....	4
4.1 Conflict of Interest.....	4
4.2 Alcohol and Drugs Management .....	5
4.3 Equality.....	5
4.4 Legal and Compliance .....	6
4.5 Occupational Health and Safety.....	6
4.6 Outside Employment .....	6
4.7 Personal Trading.....	7
4.8 Public Comment and the Media.....	7
4.9 Use of Company Equipment .....	7
4.10 Intellectual Property .....	8
4.11 Dealing with Code Breaches.....	8
5. STATUS OF THIS PROCEDURE .....	8

# 1. ORGANISATION COMMITMENT

The Objective Code of Professional Conduct provides practical guidance to all Objective employees about the professional standards required in the fulfilment of our day to day responsibilities. By applying these standards, we maintain the level of professionalism required, build a positive brand and reputation in the marketplace and increase stakeholder and customer confidence.

# 2. ELIGIBILITY

This policy applies to all employees, contractors and directors in all locations.

# 3. CODE OF PROFESSIONAL CONDUCT POLICY

## 3.1 Responsibilities of Objective's Employees

Objective's employees have a responsibility to:

- ensure that they adhere to this Code at all times
- know and comply with the requirements of the Code and any associated policies
- not act in any way that could bring Objective into disrepute
- treat colleagues and customers with respect and dignity
- adhere to Objective internal policies, legislation, regulations and stock exchange rules in the countries where they are operating in a timely manner
- participate in education and compliance training as required.

## 3.2 Responsibilities of Objective's People Managers

Objective's people managers have a responsibility to:

- ensure that their teams are aware of the Code
- ensure that they manage their teams in accordance with the Code
- report and deal with any Code breaches.

## 4. CONFIDENTIALITY AND PRIVACY

Respecting confidentiality requirements is an essential and integral part of good business practice and therefore an expectation of every employee.

Every Objective employee has a responsibility to:

- fully meet the confidentiality agreements detailed in their employment contract
- apply a principle of confidentiality to all business activities
- respect the confidentiality of colleagues, customers, vendors and business partners
- keep sensitive or confidential information in a secure and safe location
- minimise the opportunity for others to access confidential information electronically by protecting computer system and network passwords
- reserve confidential discussions for private spaces
- act reasonably to protect the privacy of all persons with whom they work and otherwise interact by not disseminating personal identification information about them (including but not limited to names, addresses, contact information) to any person who does not have an Objective-related business need to know such information.

### 4.1 Conflict of Interest

Every employee should actively avoid taking actions, making decisions or become involved in circumstances that may present a real or potential conflict of interest, either a conflict between the employee's interest to Objective or a conflict of Objective's interest as a company.

"Conflict of interest" means any situation where a person or a company/entity is in a position to exploit a personal or professional position or capacity in some way for their own personal or corporate/professional benefit. It can be helpful to also think of it as "conflict of roles". Or to put it another way, Objective employees all have multiple interests and compliance, one interest should not give rise to any corruption of or reasonable perception of corruption of another interest.

Where there is any likelihood of such conflict arising you should make full disclosure to your General Manager and obtain Objective's approval prior to acting.

Every Objective employee has a responsibility to:

- avoid situations in which your personal interests may present a real or potential conflict with those of Objective
- avoid situations involving family or friends where a potential conflict may present itself
- seek clarification if you have any concerns over potential conflicts of interest with your General Manager.

Examples of conflict of interest could be:

- Objective elects to submit a tender to a prospective customer. A sales employee happens to personally know the tender evaluation representative at a prospective customer. The sales employee must inform their Manager about the friendship so that Objective can ensure that the sales employee is not assigned to work on that specific tender opportunity, otherwise there could be a perception of some corruption of the tender evaluation process.
- Employee A has a grievance against Employee B (see Grievance Policy). In the assessment or appeal process a person who is a close personal friend or colleague of the person about whom the complaint has arisen should not be involved, otherwise there could be a conflict between hearing the assessment/appeal fairly and using their position to close down the process to spare their friend any trouble.

## 4.2 Alcohol and Drugs Management

Objective is committed to promoting a responsible approach to alcohol in the workplace and company sponsored functions. Illegal drugs will not be tolerated under any circumstances.

Every Objective employee has a responsibility to:

- ensure they read and abide by the Alcohol and Drugs Policy
- be present in the workplace free from the adverse affect of alcohol or drugs
- act and behave in a responsible manner when drinking at company sponsored or related functions.

## 4.3 Equality

Objective is firmly committed to Equal Employment Opportunities (EEO) in all aspects of its people management practices, policies and procedures. Objective does not tolerate any discrimination or harassment and regards this as a serious matter and will ensure that any incidents will be dealt with as such.

Every Objective employee has a responsibility to:

- ensure they read and abide by our Equality Policy so that they reasonably do everything they are able to in order to help create an environment of respect and trust
- report any incidents of harassment or discrimination they have witnessed or are aware of to their General Manager or Human Resources
- attend relevant compliance training and development as required by the organisation.

## 4.4 Legal and Compliance

Objective is firmly committed to ensuring that all its business operations are ethical and are undertaken by abiding with the law of each state or country.

Every Objective employee has a responsibility to:

- fully comply with this Code of Professional Conduct
- fully comply with the Gifts and Corporate Hospitality Policy
- fully comply with all legislative and regulatory requirements relating to Objectives' business operations
- report any suspicious or fraudulent behaviour in accordance with the Objective Whistleblowing Policy
- comply with their Contract of Employment and/or Contractor Engagement agreement
- ensure they do not hold themselves out to be authorised to make any legal commitment on behalf of Objective unless, and to the extent that they are authorised to do so, as specified in Objective's Authority Matrix.

## 4.5 Occupational Health and Safety

Objective is committed to ensuring the health, safety and well being of all employees, contractors and visitors in each of its office locations.

Every Objective employee has a responsibility to:

- ensure they are aware of and abide by Objective's Occupational Health and Safety policies and co-operate on Health and Safety issues
- ensure they report to their Manager or the Corporate Administration Manager anything that they think is unsafe or could cause an accident
- ensure they observe the rules and policies concerning health and safety and security when visiting client locations.

## 4.6 Outside Employment

At Objective, the role and responsibilities of each employee always takes priority over other employment opportunities outside of the business.

Every Objective employee has a responsibility to:

- ensure that any existing outside employment commitments are openly disclosed in writing to their Manager
- ensure that any considerations of new outside employment are openly discussed with their Manager before committing to them
- ensure they abide by Objective's Confidentiality and Privacy policies when engaging in outside employment.

## 4.7 Personal Trading

Objective is a public listed company on the Australian Securities and Investments Commission and is required to abide by their governing laws. The laws governing the ability of 'insiders' to buy and sell securities are called 'insider trader rules'. A breach of these rules can be a crime that can be the subject of a prison sentence. Basically, no-one is allowed to buy or sell securities when they have material, price sensitive information not known to the investing 'public'.

Every Objective employee has a responsibility to:

- ensure they read and abide by the Policy 'Trading in the Shares of Objective'
- ensure that they do not buy or sell the Company's shares at any point in time where they are aware that the knowledge constitutes Inside Information.

## 4.8 Public Comment and the Media

Objective makes official statements and communicates with the media through co-ordinated events such as press releases, radio or television interviews, articles to newspapers, magazines or journals. These are co-ordinated and managed by the Marketing Department. All employees are able to express their views on matters of public interest as individuals however, these views should not include or make reference to the company name, our products or your role within the organisation.

Every Objective employee has a responsibility to:

- ensure they refer all requests for public comments to the General Manager of the Marketing department
- ensure that any requests or engagements for public speaking on behalf of Objective are approved by the General Manager of Marketing before agreeing to commit
- are in adherence with the Social Media Policy and any comments you make on blogs or social networking sites are not on behalf of the company and do not reference the company name, our products or your role within Objective.

## 4.9 Use of Company Equipment

Objective provides and entrusts employees with tools and equipment to enable you to fulfil the responsibilities of your role, meet your performance requirements and deliver high standards of service to our customers.

Every Objective employee has a responsibility to:

- ensure they take due care of company equipment which includes ensuring laptops left in the office are locked up overnight or for extended periods of time
- ensure that any private use of the equipment is in line with our Electronic Communications Policy
- ensure they utilise the equipment efficiently and economically.

## 4.10 Intellectual Property

### 4.10.1 Objective Intellectual Property

As a software and online solutions company, Objective is focused on creating and protecting our 'intellectual property' i.e source code, object code, specifications, user manuals, diagrams, documents, reports, templates, formulae, lists, schedules, marketing material, etc. All such material is subject to copyright and all copyright created by Objective employees in the course of their work and/or using Objective equipment automatically becomes the property of Objective. It is also confidential to Objective and unauthorised disclosure is not permitted – see the Confidentiality and Privacy Policy above.

### 4.10.2 Other Intellectual Property

No third party software, whether open source and freely downloadable, or otherwise, is to be introduced into Objective's IT environment and systems without prior written approval from the System Administrator. If you use third party software and tools for day to day work in the Engineering division of Objective you should still seek prior written approval to introduce such material into Objective's environments.

## 4.11 Dealing with Code Breaches

Any employee who is aware of a breach or suspected breach of this Code should report it to their Manager who will report it to the General Manager – Corporate Operations or Objective's General Counsel.

Any person who reports in good faith a suspected breach of the Objective Code of Professional Conduct can do so confidentially and will not be subject to retaliation or suffer any recrimination for making the report.

Deliberate breaches or negligence of the Objective Code of Professional Conduct will lead to disciplinary procedures which ultimately could lead to dismissal.

## 5. STATUS OF THIS PROCEDURE

The company reserves the right to alter any of its terms at any time, although we will notify you in writing of any changes.

## DOCUMENT INFORMATION

### VERSION HISTORY

Created By:	Version:	Date:	Capacity:	Reason:
Pauline Nel	1.0	8/09/11	HR Manager	Creation of Policy.

### REVIEWED BY

Reviewed By:	Version:	Date:	Capacity:	Reason:
Diane Murphy	1.1	4/11/10	HR Consultant	Review from a UK perspective.
David Barnes	1.2	24/1/11	GM	
David Gordon	1.3	24/3/11	GM	
Nadia Santomaggio	1.4	4/8/11	General Counsel	

### DISTRIBUTION LIST

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### REFERENCED DOCUMENTS

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### ACCEPTANCE SIGNOFF

Reviewer:	Capacity:	Version:	Date:	Signature:
David Barnes	GM	1.5	8 September 2011	David Barnes