

CODE OF CONDUCT

PURPOSE OF THE CODE

Soprano is committed to a high level of integrity and ethical standards in all of its business practices. We need to conduct ourselves in a manner consistent with current community and business standards and in compliance with all relevant laws. The Code of Conduct outlines how we expect our representatives to behave and conduct business in the workplace on a range of issues. It includes legal compliance and guidelines on appropriate ethical standards.

APPLICATION

All employees and directors must comply with the Code of Conduct. It applies to all business activities with suppliers, contractors, customers, shareholders, employees and agency temps in Australia and overseas.

Responsibility lies with every person covered by the Code of Conduct to conduct themselves in accordance with the expectations set out in the Code.

HOW THIS CODE INTERACTS WITH OTHER SOPRANO POLICIES

You should read the Code of Conduct alongside Soprano's other corporate policies, which are available on our intranet. We regularly assess and upgrade our policies and procedures to ensure compliance with corporate governance requirements.

KEY PRINCIPLES

The Code of Conduct can't cover every ethical issue that you might face, nor every law and policy that applies to Soprano in the many countries that it operates. You should be guided by the key values that sit behind this Code of Conduct, namely:

- our actions must be governed by high standards of integrity and fairness;
- our decisions must be made in accordance with the spirit and letter of the law; and
- our business must be conducted honestly and ethically, with our best skills and judgment, and for the benefit of customers, employees, shareholders and the

Company alike.

Remember...

We expect you to carry out your work with a clear conscience. It may help to ask yourself the following questions about the actions you are considering in a particular situation:

- *Would you feel comfortable telling your family or work colleagues about it?*
- *Would you be comfortable if your actions were reported in a newspaper or on a website?*

If the answer to either of these questions is "no", it's likely that the conduct breaches this code.

If you have any questions regarding the Code of Conduct or any of Soprano's policies at any time, please speak to your manager, a member of the legal team or contact the Company Secretary.

WE COMPLY WITH THE LAWS IN THE COUNTRIES WHERE WE OPERATE

You should be aware of, and comply with, your duties and obligations under the laws and regulations relating to your work. You should:

- actively understand the laws which affect or relate to Soprano's operations in the location of your work;
- use the training and resources provided by Soprano or other external service providers to maintain your knowledge of the laws and regulations, and to increase your awareness of relevant legal and industry developments; and
- interpret the law in a way which reinforces the Company's reputation for integrity.
- If you have a question as to whether particular laws apply or how they may be interpreted, please contact a member of Soprano's legal team.

WE HOLD OURSELVES TO A HIGH STANDARD IN ALL DEALINGS

Soprano aims to maintain a high standard of ethical behaviour in conducting its

business, and to behave with integrity in all dealings with customers, shareholders, government, employees, suppliers and the community.

Examples

In contract negotiations, this means being accurate and complete in all representations. The submission to a customer of a proposal, quotation or other document or statement that is false, incomplete or misleading can result in civil and/or criminal liability for the corporation and the involved employees who condone such a practice.

When developing and delivering quality products, this means we ensure that the product which meet all legal requirements, contractual obligations and company quality standards.

When selling our products, this means that we do not give undertakings about unannounced products or product developments without the written approval of our CEO

When making a job offer to a new candidate, this means fairly representing the role, compensation and future opportunities.

WE AVOID CONFLICT OF INTEREST

You need to act in the best interest of Soprano at all times. You should avoid situations where your own personal interests, including your financial and business interests, conflict with (or have the potential to conflict with) your work duties or Soprano's best interests.

You are responsible for notifying Soprano of any conflicts of interest (actual or potential). If you are concerned that you may have a conflict of interest you should disclose that interest and discuss the matter with your manager.

Examples

Don't accept unreasonable gifts from, or give unreasonable gifts to, our customers or suppliers. Soprano deems a gift over AUD \$200 (or local equivalent) as unreasonable – but you need to avoid any gift that has the potential to influence (or be perceived to influence) a decision or outcome.

You should avoid having any significant ownership interest or financial stake in another business if that business compromises (or appears to compromise) your responsibility to act in the best interests of Soprano.

You must not take advantage of property, information or other opportunities arising from your role at Soprano, including the use of our information for personal gain, or by passing such information to others.

WE ARE CAREFUL ABOUT HOW WE HANDLE INFORMATION

Soprano respects your privacy and privacy of others. We treat personal or confidential information with an appropriate level of care and take steps to keep such information secure and to prevent unauthorised disclosure. When handling information, you need to comply with Soprano's privacy and security policies.

We keep full and accurate information about our business activities in accordance with legal requirements. If you are responsible for maintaining such information, you must not misrepresent, falsify or make any improper alteration to these records.

WE MAINTAIN A POSITIVE, SAFE WORK ENVIRONMENT

We value diversity and inclusion and the benefits they bring to our business. We are committed to:

- equal employment opportunity;
- compliance with the letter and spirit of a full range of fair employment practices and anti-discrimination laws; and
- a workplace free from any kind of discrimination, harassment or intimidation of employees.

Soprano will promptly investigate all allegations of harassment, bullying, victimisation or discrimination and will take appropriate corrective action. Retaliation against individuals for raising claims of harassment or discrimination will not be tolerated.

We are committed to maintaining a healthy and safe working environment for our employees. All appropriate laws and internal regulations (including occupational health and safety laws) must be complied with. Nothing is so urgent that it cannot

be done safely.

WE ARE CAREFUL WHEN WE COMMUNICATE PUBLICLY

You are responsible for the integrity of the information, reports and records that you control and you are expected to exercise the highest standard of care in preparing materials for public communications. Those documents and materials should:

- comply with applicable legal requirements;
- fairly and accurately reflect the transactions or occurrences to which they relate;
- not contain any false or intentionally misleading information, nor intentionally misclassify information; and
- be in reasonable detail and recorded in the proper account and in the proper accounting period.

Media statements and official announcements may only be made by persons authorised under the Disclosure Policy. If you receive a request for information and you are not authorised to respond to the enquiry, please refer the request to the appropriate person.

Unless the CEO has given prior written consent, you must not participate in public forum discussions (including internet-based forums) and social media platforms where the subject matter is related to Soprano, its competitors or the industry in which Soprano operates.

WE ARE A RESPONSIBLE MEMBER OF THE COMMUNITY

Soprano is a responsible corporate citizen and we actively supports the communities in which we live and work. Each employee is expected to uphold our commitment to pursue good corporate citizenship while engaging in corporate activity.

We are committed to doing business in an environmentally responsible manner and identifying environmental risks that may arise out of our operations.

We don't use our business to advance political causes. You are free to participate in the political process as an individual, but we ask that you do not engage in actions that could cause someone to believe that your actions reflect the views or position of Soprano if that is not the case. It is against Soprano policy to use corporate funds

for political purposes.

WE MUST EACH ACT WITH HONESTY AND INTEGRITY

You must not pay or receive any bribes, facilitation payments, inducements or commissions (this includes any item intended to improperly obtain favourable treatment or avoid unfavourable circumstances) or otherwise act in an unethical way. Agreeing not to act may have the same ramifications as acting in an unethical way.

You must not act in any way that could cause harm to Soprano's reputation or market position during or after your employment. Employees have a duty to act in a manner that merits the continued trust and confidence of the public.

SPEAKING UP

We encourage you to speak up if you see something that doesn't meet with expectations set out in this Code, breaches a Soprano company policy, or is potentially illegal. You can report your concern to your manager or to the Company Secretary if you are comfortable with this.

Alternatively, Soprano has put in place a Whistleblower Policy, which will allow you to report a breach (or potential breach) confidentially and anonymously.

Soprano is committed to ensuring that you are not disadvantaged or discriminated against for reporting unacceptable conduct in good faith. Our Whistleblower Policy sets out the protections available to whistleblowers in further detail, along with the process we follow to investigate reported conduct.

CONSEQUENCES OF BREACH THE CODE

Breach of this Code may result in disciplinary action being taken against relevant employees, including dismissal in serious cases.

RESPECT AT WORK

Soprano commits to take reasonable and proportionate measures to eliminate, as far as possible:

- discrimination on the grounds of sex in a work context
- sexual harassment in connection with work
- sex-based harassment in connection with work
- conduct creating a workplace environment that is hostile on the ground of sex
- related acts of victimisation

Sexual harassment may be considered gross misconduct and result in summary dismissal.

VERSION CONTROL		
Date	Version	Comments
23 June 2020	V1.0	Original version
15 Dec 2023	V1.1	New formatting & updates for the Respect@Work law changes.