

Code of Conduct



Code of Conduct

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1. CONTROL AND ACCEPTANCE

1.1 Document Control

Release Version	Release Date	Security Classification	Author Name
2.0	27/03/2026	Restricted	Frances Gallina

1.2 Document Acceptance

Accepted By	Date Accepted	Title
Chelsea McDonald	20/03/2026	General Counsel

1.3 Version Control

Version	Date	Approver	Comments
1.0	21/12/2023	Head of People & Culture	Approved by Board
2.0	16/03/2026	Data and Compliance Officer	Update to General Expectations and contacts

1.3 Classification

Confidentiality	"Company" In Confidence
Integrity	Require
Availability	Verify

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2. COMPANY

All references in this document to the term "Company" relates to 5G Networks Limited and all subsidiaries.

3. OVERVIEW

The "Company" Code of Conduct (The Code) is based on our organisational Values, and represents our commitment to uphold ethical business practices and to meet our legal obligations.

Applied in conjunction with our Policies and Procedures, The Code of Conduct outlines the behaviours we expect from our people, and guides employees in their day to day work.

Breaches of The Code of Conduct may constitute a criminal offence and/or breaches of our legal obligations, and as such are taken very seriously. The Code sets out the process for identifying and reporting such behaviour.

4. SCOPE

This policy applies to all employees, regardless of tier or type of employment contract, e.g., temporary, fixed term, etc. and includes contractors who are providing services, agency workers, and trainees on vocational or work experience schemes, who have responsibilities for the selection, implementation, management and review of third-party provided products and services.

5. USING THE CODE OF CONDUCT

All employees of the "Company" are expected to understand this Code of Conduct and feel comfortable applying it to everyday work carried out on behalf of the "Company".

If for any reason an employee is unsure about contents or application of The Code of Conduct, or have concerns they would like to raise, employees should raise it with any of the following parties:

- Direct Supervisor or Manager
- HR team member
- Legal team member
- Whistle-blower hotline

5.1 RESPONSIBILITIES OF EMPLOYEES

We all have a responsibility to work with integrity, respect, good judgment and to act within the law. We therefore expect our employees to:

- Agree to uphold The Code of Conduct, Values, Policies and Procedures and any standards, legislation or regulations that apply to day to day work;
- Take reasonable steps to ensure that others engaged to work with the "Company" such as contractors; consultants or business partners also uphold these principles, laws and regulations;
- Raise any concerns or potential breaches immediately;
- Never ignore a breach or potential breach of The Code of Conduct;
- Never encourage, allow or personally demonstrate retaliation for someone raising a concern.

5.2 RESPONSIBILITIES OF MANAGERS

In addition to the above employee expectations, the "Company" expects all Managers & Supervisors to:

- Role model expected behaviours,
- Take responsibility for ensuring their employees understand The Code of Conduct and all "Company" policies and procedures relating to their work,
- Address any employee behaviour that is not aligned with The Code of Conduct,
- Encourage and reward employees for demonstrating our Values,
- Embed The Code into all business processes in their area of responsibility,

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- Ensure that employees feel supported and comfortable to raise concerns without fearing retaliation,
- Never ignore or dismiss a concern raised.

6. OUR VALUES

Our Values are aligned with our strategy and desired organisational culture, integral to our way of working and success in our chosen markets. Our Values are articulated as follows:



Our values reflect the behaviours that we expect Managers and Employees to uphold in their day to day work.

In relation to complying with The Code of Conduct, examples of behaviours that demonstrate the values include:

- Conducting oneself professionally with others, including peers, management and other departments;
- Treating others with respect, courtesy and communicating appropriately (such as choosing appropriate communication channels, refraining from aggressive communication or refusing to communicate with others, for example);
- In fulfilling duties, to act with accountability to customers, suppliers, peers, managers and team workers, and ensure integrity is upheld with delivering on commitments, including following appropriate processes and procedures;
- To not act in a way that is dangerous or is inappropriately risky in relation to systems, processes, customers or clients;
- Being reasonable, professional and applying common sense.

7. CODE OF CONDUCT REQUIREMENTS

7.1 GENERAL EXPECTATIONS

These expectations apply to conduct in the workplace, during work-related activities, and in external settings where an employee's behaviour may reasonably be associated with the Company, including public or online communications.

The Code sets out that our people comply with all laws and regulatory authorities. From a practical point of view, this includes the following expectations:

- Abiding by the "Company" values and comply with all applicable policies and procedures;
- Complying with lawful and reasonable directions issued by the Company or authorised managers;
- Upholding the principles of equal opportunity and embrace the diversity in our business;
- Conducting work in a safe, responsible and effective manner;
- Avoiding, preventing and not tolerating any form of discrimination, bullying, sexual harassment, victimisation, hostile workplace conduct or other inappropriate workplace behaviour, including conduct that creates a risk to psychological health and safety.
- Taking reasonable care that conduct does not give rise to psychosocial hazards, including excessive workload, unreasonable behaviour, sexual harassment, aggression, exclusion or exposure to traumatic material, in accordance with applicable work health and safety laws.
- Not engaging in hate speech, vilification, or conduct that incites hatred, serious contempt or violence against individuals or groups based on protected characteristics (such as race, religion, ethnicity, gender, sexual orientation or disability), whether in the workplace, in

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business communications, or on public platforms where the employee may reasonably be associated with the Company;

- Complying with the law and any regulatory authorities;
- Respecting and maintaining the confidentiality and privacy of personal, confidential and sensitive information in accordance with the Privacy Act 1988 (Cth), the Australian Privacy Principles, and applicable data security and notifiable data breach obligations, except where disclosure is authorised or required by law;
- Perform duties to the best of the employees abilities, taking into account skills, experience and qualifications;
- Attending work in a fit and well state, including not under the influence of drugs and alcohol;
- Ensuring personal matters, personal business, financial and other outside interests do not conflict with, or appear to conflict with the Company or individual roles/duties;
- Not accepting gifts, prizes or hospitality that compromise an employee, a team, or the business (see "Gifts and Hospitality" section below for further details);
- Responsibly managing any company assets entrusted to the employee and when spending "Company" funds, ensuring the transaction is properly documented and that we receive appropriate value in return;
- Reporting unethical, illegal or improper behaviour, including breaches of The Code, using the guidelines below.

7.2 DECLARATION OF GIFTS AND HOSPITALITY

Gifts and hospitality must never be offered, given or accepted where they could constitute or be perceived as a bribe, inducement or improper influence, or otherwise breach anti-bribery, corruption or public integrity laws. Employees must not accept for personal use, or for the use of others, any gift, favour, loan, or any other thing of monetary value that might influence, or appear to influence, judgment or conduct in day to day work.

Employees may accept occasional/annual unsolicited courtesy gifts or favours (such as business lunches, tickets to sporting events or cultural events, gift baskets, flowers, etc.) so long as the gifts or favours have a market value under \$200, are customary in the industry, and do not influence or appear to influence the judgment or conduct of the employee. Employees must report any gifts or favours offered or given to their manager and specifically, for gifts above \$200 employees must obtain the written approval of their manager before accepting the gift or favour and it must be noted on our register for Gifts and Favours via the Legal team. Gifts or hospitality involving public officials must be disclosed to and approved by a manager prior to acceptance, regardless of value, and may require Legal approval depending on the circumstances.

7.3 DECLARATION OF CONFLICTS OF INTEREST

A conflict of interest arises when an employee's personal interests, relationships or activities (or activities of an employee's immediate family or person with whom they have a close relationship) interfere or conflict with the employee's loyalty and duties to the Company or impact the employee's objectivity in making business decisions. Examples of conflicts of interest include a friend or family member working for a supplier, customer or competitor.

Conflicts of interest must be reported to the legal team. This is a mechanism to protect employees from situations where their personal circumstances and interests could influence their decisions, or be perceived to have done so. Once disclosed, conflicts of interest must be appropriately managed, mitigated or removed as directed by the Company, and employees must promptly update disclosures where circumstances change.

8. RAISING A BUSINESS CONDUCT CONCERN

Our workplace needs to encompass a safe environment, where our people feel secure and supported about reporting incidences of wrongdoing or concern. Our people will not to be exposed to reprisal, harassment, discrimination, victimization or future career bias, or any form of retaliation a result of raising a genuine concern as prohibited by The Code.

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We expect all employees and managers to report concerns and potential breaches of The Code. Ignoring or failing to report issues in a timely manner (or at all) that have been made apparent is in itself a breach of The Code.

8.1 HOW TO RAISE A CONCERN?

1. Raise the matter with your line manager and/or the HR team; or
2. If you believe this matter requires a higher escalation, you can report the issue to General Counsel or to our Company Secretary. Alternatively, you can email the Whistle-blower mailbox whistleblower@5gn.com.au. Reports to the Whistle-blower hotline are accessible only by General Counsel and Company Secretary, and can be made anonymously; or
3. If you don't feel comfortable reporting this to the General Counsel or Company Secretary, you can escalate this to one of the Executives or our Managing Director; or
4. If this matter is of such a sensitive nature and may concern an Executive, you can report it to the Chairman of our Board.

8.2 HOW IS THE COMPLAINT HANDLED?

Reports will be handled sensitively and confidentially to the extent reasonably practicable and permitted by law, and information will only be disclosed on a need-to-know basis or where required for investigation, procedural fairness or legal compliance.

8.3 CAN A REPORT BE MADE ANONYMOUSLY?

Any report may be made anonymously, however, it must be recognised that anonymity may make the investigation of any report much more difficult. Anonymity can also be very hard to guarantee, as it may be necessary to provide evidence in either internal or external proceedings, or the law may otherwise require the formal disclosure of the report. However, all efforts will be made to ensure anonymity where it is specifically requested.

8.4 REPORTS SHOULD NOT BE CONTRARY TO THE SPIRIT OF THE CODE OF CONDUCT

It must be also stressed that the Company does not support the use of this policy as a means of airing or pursuing personal or professional grievances between employees, executives or directors, or for any individuals to make unfounded or malicious allegations. Such conduct would be against the principles set out in this Code of Conduct, and may be considered by the "Company" as grounds for action against the complainant.

8.5 STATUTORY WHISTLEBLOWER PROTECTIONS

This Code of Conduct operates in conjunction with, and does not limit, the whistleblower protections available under Part 9.4AAA of the Corporations Act 2001 (Cth). Eligible whistleblowers include current and former employees, officers, contractors, suppliers, associates and their relatives or dependants. A report may qualify as a protected disclosure where it concerns misconduct or an improper state of affairs or circumstances in relation to the Company or its related bodies corporate. The Company strictly prohibits retaliation against a whistleblower and will take all reasonable steps to reduce the risk of identification and protect confidentiality, subject to legal requirements. Disciplinary action will not be taken against a person solely because they have made a protected disclosure in accordance with the Corporations Act.

9. BREACHES OF THE CODE OF CONDUCT

Failure to comply with The Code is treated as a very serious matter and may result in disciplinary action, up to and including termination of employment, subject to procedural fairness and applicable workplace laws, as well as compensation for damage caused. Breaches that involve criminal offences will also be referred to the appropriate authorities and or police.

10. POLICY OWNERSHIP OR CONTACT INFORMATION

This policy should be read in conjunction with other employee policies and procedures, and more specifically, the Bullying, Harassment & Discrimination Policy and Work Health & Safety Policy.

This policy is owned and managed by the HR & Legal teams. You can speak with an appropriate contact within these teams. or email the Whistle-blower mailbox whistleblower@5gn.com.au .

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Any minor reviews or update to this policy will be made available to employees on the company intranet (or other appropriate central location) or provided directly to managers and employees.

11. EMPLOYEE UNDERSTANDING AND ACKNOWLEDGEMENT

I have read and understood the Code of Conduct and agree to adhere to the expectations required of me.

I also acknowledge that reviews or updates of the Code of Conduct may occur during my employment, and I agree to continue to act in the spirit of the Code of Conduct, to uphold professional and ethical behaviour during my employment.

* Digital acknowledgement via Employment Hero policies.

12. APPENDIX

12.1 REGULATIONS

Type	Legislation
ISO Standards	<ul style="list-style-type: none">• ISO 9001:2015• ISO 14001:2015• ISO 27001:2013• ISO 45001:2018
Federal Acts	<ul style="list-style-type: none">• Privacy Act 1988 (Cth) and Australian Privacy Principles• Corporations Act 2001 (Cth) (including whistleblower protections)• Fair Work Act 2009 (Cth)• Sex Discrimination Act 1984 (Cth)• Work Health and Safety Act 2011 (Cth) and applicable State legislation• Security of Critical Infrastructure Act 2018 (Cth)• Telecommunications Act 1997 (Cth)• Criminal Code Act 1995 (Cth) (bribery and corruption offences)

12.2 "COMPANY" DOCUMENTATION

Type	Document Name and Title
Tier 1: Policy	<ul style="list-style-type: none">• Bullying, Harassment & Discrimination Policy• Workplace Health and Safety policy
Tier 2: Standard/Strategy	
Tier 3: Procedure/Plan	
Tier 4: Process	
Other	