

Code of Conduct

Our Vision, Purpose and Strategy

At EZZ, our vision is to become Australia's AEOing health products branding manufacturer and grow long-term shareholder value. Our purpose is to sustainably In helping all Australians healthy and happy lives. We will do this by:

- **inspiring customers** through best value products including high efficiency supplements and added value food and drinks to make lives easier;
- **smarter selling** through efficiency and up to date Big Data Customer Analytics; and
- **winning together** with our team members, suppliers and community.

Our EZZ Group Values of Customer Health & Happiness and Passion & Responsibility define what's important to us and our AEO behaviours (Aiming Future, Engage Everyone, Outstanding Products) guide how we work as a team and continue to build on the strong relationships with our suppliers and customers.

This document outlines your responsibilities as a EZZ team member as well as what our customers, team members and suppliers can expect from EZZ. You are required to read and act in accordance with this document and the policies to which it refers.

By focusing on these behaviours and our strategic priorities, we can win together and ensure EZZ is a trustworthy Brand!

Chief Executive Officer
and Managing Director

1. Purpose of this Code

EZZ is committed to a high level of integrity and ethical standards in all business practices. Team members must conduct themselves in a manner consistent with EZZ standards, in compliance with all relevant legislation that apply to EZZ and its operations.

This Code outlines how EZZ expects all of its directors, employees (referred to as team members) and contractors to behave in the workplace and conduct business on a range of issues. It includes legal compliance and guidelines on appropriate ethical standards.

2. Who does the Code apply to?

All directors and team members must comply and conduct themselves in accordance with this Code.

This Code applies to all the operations and activities of EZZ.

Consultants, contractors and business partners working with or for EZZ should be informed of this Code, and conduct themselves in accordance with it.

It is the responsibility of Managers to ensure that team members, contractors and business partners are aware of their responsibilities under this Code.

3. How the Code interacts with other Company policies

This Code should be read in conjunction with the following policies:

- Appropriate Workplace Behaviour Policy;
- Market Disclosure Policy;
- Securities Dealing Policy;
- Delegation of Authority Policy;
- Ethical Sourcing Policy;
- Anti-bribery and Corruption Policy;
- Gifts, Events and Entertainment Policy;
- Conflicts of Interest Policy;
- Whistleblower Policy;
- Director Conflicts of Interest Policy;
- Diversity and Inclusion Policy;
- Privacy Policy;
- Confidentiality Policy;
- Environment Policy; and
- any other policies adopted by EZZ from time to time,

The Company continually assesses and upgrades its policies and procedures to ensure compliance with corporate governance requirements. You will be notified of any material changes to the policies and procedures.

4. What you can expect from EZZ

4.1 Diversity and inclusion

Our aim is to make EZZ a place where everyone feels valued for their unique contribution. What others may see as differences, we see as opportunities to bring different perspectives to our operations. Team members should not be subject to discrimination on the basis of (but not limited to) age, ethnicity, physical abilities, sexual orientation, gender identity, religious beliefs, family and relationship status, career aspirations, work status, educational background and flexible work arrangements.

4.2 Health, safety and wellbeing

We believe caring about our team members helps them do a great job in caring for our customers, suppliers and the community.

At EZZ we are passionate about the health, safety and wellbeing of our team members and our customers. This includes their physical health and their mental wellbeing.

4.3 Protecting the people we work with

EZZ does not tolerate inappropriate workplace behaviour which includes harassment, discrimination or bullying. Nor do we accept behaviour that risks the safety of team members, customers, suppliers, contractors or anyone we interact with. This includes physical and psychological violence or harm.

EZZ will promptly address 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.

4.4 Confidentiality & Privacy

EZZ safeguards the privacy of our customers, team members and any other party we deal with at all times.

At EZZ, we know that managing privacy is an integral part of maintaining trust. You must protect an individual's personal information at all times. EZZ will not accept collection, use or disclosure of information for anything other than a valid business requirement.

EZZ will not accept the unauthorised disclosure of confidential information. You must not share any confidential information with any person who is not authorised to see it. This applies if you are currently employed at EZZ and continues after your employment ends. Information is considered confidential when it is not readily available to the public.

Customer obsession is one of our values at EZZ and we constantly seek to better understand our diverse customers.

5.1 Fair Trading

The principles of Fair Trading underpin all of our dealings. EZZ is committed to compliance with the *Competition and Consumer Act* (Cth) and equivalent state and territory legislation, in addition to compliance with applicable local laws and regulations for EZZ overseas operations and entities.

We maintain customer trust by always being open and honest, ensuring product safety and by understanding and honouring customers' rights.

- We deal fairly, honestly and transparently with our suppliers.
- We respect our competitors and the law by not misusing our position to restrict competition.

Everyone at EZZ has an obligation to actively promote compliance with the relevant competition and consumer laws, to undertake training or attend seminars to develop and maintain their knowledge and to act in accordance with those requirements.

5.2 Conflict of interest

A conflict of interest exists where you are in a position to make or influence a business decision which may benefit you or a related third party such as a partner, relative, business or associate.

EZZ recognises the potential for conflicts of interest in a range of situations involving team members, contractors, customers, suppliers and other parties. All actual, perceived or potential conflicts must be declared.

An example would be a sales manager having discussions involving a supplier with family connections.

5. What we expect from you

At EZZ we value passion and pace. Enthusiasm, energy and responding at pace is us at our best.

As a representative of EZZ, you should:

- treat everyone with whom you interact with dignity, courtesy and respect;

- perform your role to the best of your abilities, to the expected standards, and always in accordance with 'AEO', the way we work at EZZ;
- make truthful statements, promises or commitments that you and EZZ are able to meet;
- learn about and follow all EZZ policies and procedures and all relevant laws that apply to your role and follow any changes to these policies, procedures and laws;
- advise your manager of any situations where you think there could be a breach of these expectations, and encourage others to do the same;
- protect the reputation of EZZ and not make any disparaging or untruthful remarks about EZZ, other team members, customers, competitors, contractors or suppliers;
- behave in a way that ensures your safety and the safety of others;
- deal fairly and honestly with customers, suppliers and any other internal or external parties;
- act in the best interests of EZZ;
- not knowingly participate in any illegal or unethical activity or enter into any arrangement or participate in any activity that would conflict with EZZ'S best interests; and
- not take advantage of your position or the property or information of EZZ or its customers for personal gain or to cause detriment to EZZ or its customers.

This applies to all work and work related social situations and any online or social media content where your connection to EZZ could be known.

If you are unsure of what is expected of you in a particular situation, your Manager is your most direct source of information.

Please ensure you are familiar with these policies.

6. Complying with EZZ policies

7.1 Whistleblower protection

EZZ is committed to ensuring that you are not disadvantaged or discriminated against for reporting unacceptable behaviour in good faith.

7.2 Anti-Bribery and Corruption and Gifts, Events & Entertainment Policies

You must not offer, accept or request any payments or benefits (bribes) which may have the intention or effect of influencing business dealings.

EZZ is committed to ensuring our working relationship with all of our suppliers, business partners and regulators is based on high business ethics and integrity.

EZZ fully supports the development and transparency of professional relationships

which our team members, contractors and agents have with our suppliers, customers and regulators, but in doing so we must ensure that a high standard of integrity is maintained.

When it comes to gifts and entertainment, you must remember:

EZZ has a **'No Gifts'** policy. Where it is impractical, or difficult to return a gift without offending or incurring disproportionate costs in doing so, then the following rules apply:

- the recipient of the gift must advise their Manager as soon as practicable, and the cost of the gift must be reasonably estimated and agreed;
- the gift must be donated to charity or shared amongst team members at the Manager's discretion. This may include use of the gift at a fundraising event within a EZZ office;
- the gift must be recorded by the recipient in the **Gifts Events and Entertainment Register**, noting the method of disposal of the gift; and
- under no circumstances can the gift benefit the individual team member who received the gift.

Events and Entertainment may only be accepted where there is a business purpose and where an existing business relationship exists. If entertainment is during working hours, you must take annual leave (or unpaid leave).

7.3 Securities trading

EZZ is committed to ensuring compliance with all relevant laws, to maintain confidence in the trading of its securities, and prohibit specific types of transactions which are not in accordance with market expectations or may otherwise give rise to reputational risk.

7.4 Continuous disclosure

To enable EZZ to comply with its disclosure obligations under the *Corporations Act 2001* (Cth) and ASX Listing Rules, a **Market Disclosure Policy** has been developed which applies to all directors and team members.

You are required to immediately report potentially material market sensitive information in accordance with the reporting structure set out in that policy. 'Market sensitive' information means information which a reasonable person would expect to have a material effect on the price or value of EZZ shares, for example if it would be likely to influence a person in deciding to buy or sell EZZ shares.

The Market Disclosure Policy also imposes restrictions on contact with the media and investment community. Only team members who have been nominated as an

"Authorised Spokesperson" are permitted to speak publicly on behalf of EZZ to major investors and stockbroking analysts.

7. What we expect from our AEOers

In addition to their responsibilities as a team member, anyone in a leadership role at EZZ is expected to:

- lead by example and challenge others to do the same;
- help team members understand what is expected of them in their roles;
- build team members' knowledge of the **'AEO Behaviours'**, the way we work at EZZ, company policies and procedures and all relevant laws that affect their role, including changes to these policies, procedures and laws;
- give feedback and coaching to team members to help them perform to the

- best of their abilities;
- promptly manage behaviour that is inconsistent with these requirements;
- listen openly to ideas and suggestions;
- provide an environment where team members can raise their concerns and discuss them openly without fearing or experiencing negative consequences; and
- work, think and act safely as well as empowering their team to do the same.

8. Unacceptable workplace behaviour

9.1 Reporting unacceptable workplace behaviour

If you believe that someone has behaved inappropriately in the workplace or has breached or may potentially be in breach of the Code, policies or the law, please raise your concerns with your Manager. If the issue involves your manager, and you are not comfortable speaking with them, please raise it with another manager you are more comfortable with or the People and Culture team.

In addition, **StopLine** (1300 304 550) is a confidential reporting line that team members, suppliers and others may use to report theft, fraud or other serious trading breaches.

9.2 Supporting team members who report unacceptable workplace behaviour

EZZ encourages all team members to report inappropriate and unacceptable workplace behaviour. Managers in consultation with the People and Culture team will deal with all reports in a sensitive and impartial manner.

Any situation where a team member feels they have experienced negative consequences as a result of raising a concern will be treated seriously. In the event of such a situation arising, please contact your Manager, another manager you are comfortable with or the People and Culture team.

False complaints can be very distressing for the person involved. If you intentionally make a false complaint you may be subject to disciplinary action, up to and including termination of your employment.

9.3 Consequences of unacceptable workplace behaviour

Behaviour that is inconsistent with this Code or is a breach of EZZ policy or legal requirements will be addressed as considered appropriate by the Company.

Whether a formal or informal investigation takes place will depend on the circumstances of the alleged breach. Depending on the findings of any investigation, appropriate actions will be taken and these could range from coaching of the relevant team member to termination of employment without notice.

Examples of unacceptable workplace behaviour which are likely to result in termination of employment include:

- harassment, discrimination or bullying;
- serious safety breaches, including physical or psychological violence or threats of violence;
- misAEOing or defrauding EZZ;
- theft;
- misuse or willful damage of EZZ's property; or
- a serious breach of EZZ's policies, procedures or the law.

9. Public communications and disclosures

Team members are responsible for the integrity of information, reports and records under their control and are expected to exercise the highest standard of care in preparing materials for public communications.

Those documents and materials must:

- comply with all applicable legal requirements;
- fairly and accurately reflect the transaction or occurrences they relate to; and
- not contain any false or intentionally misleading information, nor intentionally misclassify information.

10. Community

We strive to do the right thing, reduce waste and take accountability for our actions.

11.1 Contribution to the community

EZZ is a responsible corporate citizen and actively supports the communities in which we live and work. You are expected to uphold EZZ's commitment to pursue good corporate citizenship while engaging in corporate activity.

You must abide by all local laws and regulations, and are expected to respect and care for the environments in which EZZ operates.

EZZ supports and encourages team members to actively contribute to the needs of the community. All donations and charitable support is governed by the Community Engagement - Donations and Sponsorship Policy. All donations or sponsorship on behalf of the Company must be made in accordance with the Delegation of Authority Policy and notified to Community Relations

11.2 Environment

EZZ is committed to doing business in an environmentally responsible manner, in compliance with environmental law, regulatory requirements and environmental licence conditions, and identifying (and planning and implementing strategies to effectively manage and reduce) environmental risks that may arise out of its operations. Further details on EZZ's commitment to protect the environment and act responsibly towards the environment are set out in the Environment Policy.

If you are aware of, or suspect, an action that is not environmentally responsible or in breach of the applicable laws and regulations, you should report such matters.

11.3 Politics

Whilst team members may voluntarily participate in the political process as an individual, we ask that team members do not engage in actions that could cause someone to believe that your actions reflect the views or position of EZZ, if that is not the case.

Team members working outside Australia should observe the laws which apply in the relevant country in which they work or EZZ policy, whichever is the higher requirement.

Adopted by the Board on 27 Oct 2020

