



CODE OF CONDUCT.

March 2017

THE WHY

If you work for Vocus, we already think you are an awesome person with a great attitude, unleashed and empowered to do your job. We don't have Muppets at Vocus so, whatever your role, we need you to make good decisions and take a genuine interest in making Vocus Awesome for all of us and for everyone we deal with.

THE WHO

This code covers all team members of Vocus, whichever "brand" you work for. This includes Directors, full time, part time, casual, temps and contractors.

THE WHAT

The way we do what we do, makes Vocus unique. We have values that are simple. It is how we do business and what our company is all about. Our values are;

Clever Company No Muppets – We are awesome people with a great attitude, unleashed and empowered to do our job.

Don't Screw the Customer – We put ourselves in the customers' shoes, we make it easy to buy and easy to use.

Have a Crack – We detest mindless bureaucracy, we collaborate to find a smarter way, we take risks, we act decisively and we celebrate our wins

Don't be a D!@khead – We respect each other, we value relationships and we have the hard conversations.

This code is to help you understand and follow the do's and the don'ts of working for Vocus and gives you a sense of what we truly care about and expect from you.

THE DETAIL

COMPLIANCE WITH LAW AND CONTRACTS

You need to be aware of the laws and regulations applicable to you in your employment and comply with them at all times. Vocus has various compliance courses that you need to complete through the Vocus Learning Centre (VLC). These are in place to help you understand the right thing to do and to protect you and the company.

Similarly, there may be restrictions which apply to you in a particular role. For example, you might have signed a confidentiality agreement to access a customer's confidential information.

You also have a responsibility to be aware of and adhere to the standard terms of employment with Vocus and all of our company policies. If you have any questions about this, refer them to your manager or your HR Business Partner.

FAIR DEALING

We are a business that acts fairly and ethically in all our business transactions. We are people who act with integrity with our customers, shareholders and stakeholders. We know that our reputation takes years to build, but can only take minutes to destroy. In the event that you feel that the business or our people has not acted fairly, we suggest that you get in contact with your manager or refer to our Grievance Policy or Whistleblower Policy located on our intranet.

CONFLICT OF INTEREST

If you feel that you may have a personal or financial conflict of interest with Vocus' business, the ball is in your court to let us know as soon as you can. This could be any personal interest that may influence the way you complete your work.

For example: If you work for Vocus Monday to Friday and have decided to take up a second job on the weekend for some extra cash, you need to declare your second job to your manager so we can check there is no conflict of interest.

If you decide to open a business which sells telco products you will need to declare this to Vocus.

We expect you to act in the best interests of Vocus. So before you make a decision, ask yourself whether your decision would be different if you didn't have a personal interest in the outcome of the decision. If you're not sure, speak to your manager.

Please contact our Company Secretary companysecretary@vocus.com.au if you have questions.

RESPECT

We are a Clever Company and we are committed to providing a comfortable and professional working environment where different experiences are valued and you are respected and treated fairly at all times. We won't always see eye to eye and these differences of opinion can help make us a great place to work. However, no matter what, we must always treat each other with respect and courtesy.

At Vocus, we want you to receive fair and equal treatment based on your ability to carry out your job and there will be zero tolerance for any behavior to the contrary.

Please refer to our Equal Employment Opportunity & Anti-Discrimination policy, our Bullying & Harassment policy and Grievance Policy for more details located on the intranet.

PRIVACY

In your job you will likely be exposed to private or personal information relating to customers and sometimes your colleagues. Vocus expects you to do all things necessary to protect personal information from unauthorized access, use or disclosure. All team members must act in accordance with the Australian Privacy Principles (APPs) as set out in the relevant law – more information can be found at www.privacy.gov.au

It comes down to our values. **Don't screw the Customer.** You'd feel pretty annoyed if someone disclosed your private or personal information unnecessarily but it's also illegal.

CONFIDENTIALITY & CONTINUOUS DISCLOSURE

Treat all information shared with you internally by email, on the intranet, internal chat medium and other forms of communication as confidential.

Any wrongful use of inside information regarding the share price, mergers, acquisitions and company finances could be deemed as 'insider trading'. Insider trading is something ASIC feels very strongly about, so if you do it, you might find yourself in serious trouble!

On the other hand only tell people what they need to know if they are supposed to know it.

For more information refer to the Communications & Continuous Disclosure Policy & Securities Trading Policy located on our intranet.

ACCEPTING OR GIVING GIFTS

Accepting or giving gifts that influence the outcome of a sale or deal or other decision is not the way we do things here at Vocus. Bribes, inducements and similar payments are completely unacceptable.

If you are unsure about accepting a gift from a supplier or vendor, talk with your manager.

For example; you may have a meeting with a vendor for the first time – and they leave you with note pad, pen and a box of chocolates – this sort of gift is OK. However, if a supplier offers you tickets to an event, holidays, money, expensive lunches, wines or any other gift of substantial value, you should discuss this with your manager to keep it all above board.

SOCIAL MEDIA

For many of us, social media is part of our day-to-day lives and at Vocus we encourage you to be active on social media. Your activity must always reflect and respect Vocus, our team members, suppliers and our customers in a positive light. Remember, your views will not always be seen as your personal views and may be regarded as Vocus' views, particularly if you hold a senior/management role.

Social Media includes any online forum or content that can link you to Vocus. For example; Facebook, Twitter, YouTube, Blogs, Forums, LinkedIn.

Keep a lid on any sensitive or confidential information (including personal information) and act with integrity towards the business when using Social Media. Ultimately you will be personally responsible for your social media activities, even if your activities occur outside of work. If you have any doubt about what you are posting, **do not post it**. Use common sense or seek guidance from your manager. Any inappropriate behavior will be dealt with in line with our Disciplinary Policy which can be found on the intranet.

For more details on Social Media and corporate communications generally please refer to the Social Media Guideline and the Continuous Disclosure & Communications Policy located on our intranet.

RECRUITMENT

We will always follow a fair and equitable selection process to ensure jobs always go to the candidate best suited to the role, based on skill and fit.

When you are considering taking your next step in your career with Vocus, before you throw your hat in the ring for a new role, please make sure your manager is aware of your application. This keeps the lines of communication open and a potential transition process smooth.

For information on the recruitment process please refer to the [Talent & Recruitment page](#) located on our intranet.

TECHNOLOGY ACCEPTABLE USE & SECURITY.

Remember, no-one at Vocus is a Muppet, so we expect everyone to use all company communication systems in an appropriate manner. Using our systems with respect, taking care to protect information and IT assets and communicating in a respectful manner is expected. So don't act like a D!@khead and abuse any of our company resources or compromise our data security.

It's simple really;

- If you wouldn't talk that way to someone's face, don't talk that way via email.
- Do everything you should to protect personal, customer and company information. For example;
 - o Don't give any of your log-in and password details to anyone
 - o Keep customer information private and confidential.
 - o If you come across any emails with suspicious content or attachments, don't open them, report them to IT straight away.
- If you identify any improper user or breach of information security then speak to your manager.

For more information and detail of the consequences have a read of the Technology Acceptable Use Policy, Technology Security Policy, Privacy Policy & Disciplinary Policy located on our intranet.

WORK SAFETY

Being safe at work is a basic right. We need to look after ourselves and look after our team members around us. You will be expected to complete WHS compliance training each year to ensure you're up to date with your responsibilities.

For detail on being safe at work, have a read of the Workplace Health & Safety Policy.

DRUGS & ALCOHOL

Ensure that at all times you are in a state that will enable you to uphold the company values and perform your work to the required standard.

We get that you might go out for a celebratory team lunch and have a beer with your chicken schnitzel. We are OK with that.

But if you take it too far and your state affects your colleagues, your work or our reputation, that's something that we are not OK with.

If you are found to be in a state that is not acceptable at work, it may result in disciplinary action or other penalty including, in extreme circumstances, dismissal or termination of employment.

If drugs or alcohol is something that you struggle with, speak with your manager, HR or access the Employee Assistance Program for support.

FRAUD AND COMPANY PROPERTY

Company money and property (such as your computer and stationery) belongs to Vocus and is provided to you for you to use in your work. Being honest and transparent is expected of you and your team mates. If you identify any dodgy activity you should let us know by emailing the Company Secretary companysecretary@vocus.com.au

For more information read the Whistle-blower Policy.

DRESS CODE

We don't have one! We figure we don't need a strict dress code if we don't have Muppets. We trust you to dress yourself and come to work dressed appropriately for your role or day's activities.

EXPENSE CLAIMS

If you incur work-related expenses, you can claim them back through the company's expense management system. Just so there are no misunderstandings, unless you are travelling or entertaining a client, here are a few personal expenses that are not classified as work related expenses;

- Your daily coffee (or your friend's or colleagues for that matter)
- Your daily lunch
- Parking
-I think you get the idea

If you are unsure whether an item should be claimed as a work expense then speak to your manager.

CONSEQUENCES OF BREACHING THE CODE OF CONDUCT

If you do the wrong thing in relation to any of the contents of this code of conduct, it may result in disciplinary action or other penalty including, in serious circumstances, termination of employment.

For more information on the consequences of a breach, read the Grievance & Disciplinary Policy located on our intranet.

Have more questions or couldn't find what you were looking for? Please contact your Manager or HR Business Partner for more details.