



PEOPLE & CULTURE POLICIES & PROCEDURES			
Code of Conduct			
Date effective: 1 April 2021	Review date: 1 April 2022	Document no: HC-003	Version no: 3

1. Purpose

The iQ Group Global group of companies refers to each related body corporate (within the meaning of section 50 of the *Corporations Act 2001* (Cth)) and each affiliate of any of The iQ Group Global Ltd (ACN 149 731 644), iQ3Corp Ltd (ACN 160 238 282), IQX Ltd (ACN 155 518 380) and Farmaforce Ltd (ACN 167 748 843) ('The iQ Group Global').

- 1.1 The iQ Group Global recognises the importance of a work environment which actively promotes best practice. The purpose of this Code of Conduct ('Code') is to describe the standards of behaviour and conduct expected from its employees, agents and contractors ('Workplace Participants') in their dealings with customers, suppliers, clients, co-workers, management and the general public.
- 1.2 The iQ Group Global requires all Workplace Participants to observe and comply with the standards set out in this Code. Non-compliance may result in disciplinary action including the termination of employment or contract for services.

2. Scope

- 2.1 This Policy covers all employees of The iQ Group Global (whether full-time, part-time or casual) and all persons performing work at the direction of, in connection with, or on behalf of The iQ Group Global (for example contractors, subcontractors, agents, consultants, and temporary staff) (collectively 'workplace participants').
- 2.2 The Code relates to each entity of The iQ Group Global and, where relevant, operates in conjunction with other policies relating to minimum standards of behaviour, conduct and the terms of a Workplace Participant's contract of employment or contract for services.
- 2.3 The Code does not form part of any employee's contract of employment, nor does it form part of any other Workplace Participant's contract for services.

3. Commencement of the code

This code will commence from 1 April 2021 (as amended from time to time) and it replaces all other codes of conduct of the iQ Group Global.

4. The code requirements

- 4.1 The Code provides a non-exhaustive overview of The iQ Group Global's fundamental business values.
- 4.2 Workplace Participants must comply with the following standards of behaviour inside the workplace and outside the workplace (where the



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Workplace Participant can be perceived as representing The iQ Group Global):

- a) Conduct themselves in a professional and courteous manner.
- b) Comply with all laws, policies, procedures, rules, regulations and contracts and report any violations of the same to management.
- c) Comply with all lawful and reasonable directions from The iQ Group Global.
- d) Be honest and fair in dealings with customers, clients, suppliers, co-workers, management and the general public.
- e) Display the appropriate image of professionalism at the workplace, which includes wearing appropriate business attire and ensuring that their appearance is professional, neat and tidy (see Dress, Personal Hygiene and Grooming Policy).
- f) Treat customers, clients, suppliers, co-workers, company management and the general public in a non-discriminatory manner with proper regard for their rights and dignity. The IQ Group Global will not tolerate any: discrimination, victimisation or harassment based on a person's race, colour, religion, national origin, age, sex, sexual orientation, marital status, family responsibilities, pregnancy or potential pregnancy, union membership or non-membership, mental or physical disability, or any other classification protected by law (see Anti-Discrimination and EEO, and Workplace Bullying Policies).
- g) Maintain punctuality. If a Workplace Participant is late or cannot report for work, they are required to let their line manager know as soon as possible. If the line manager is not available, employees should notify People & Culture via email at: people.culture@theiqgroup.com.au.
- h) Not use work time for private gain. If a Workplace Participant is required to leave the work premises for personal reasons, they should advise their line manager well in advance.
- i) Not participate in private activities where such activities may:
 - a. bring disrepute upon The iQ Group Global;
 - b. instigate or contribute to a breakdown in working relationships with other Workplace Participants;
 - c. interfere with The iQ Group Global's relationships with customers, clients, suppliers, other Workplace Participants and the general public at large;



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- d. cause damage to the relationship between the Workplace Participants and The iQ Group Global or is otherwise incompatible with the Workplace Participants Obligations to the iQ Group Global;
- e. otherwise damage the iQ Group Global's interests.
- j) Maintain and develop the knowledge and skills necessary to carry out duties and responsibilities.
- k) Observe health and safety policies and obligations and co-operate with all procedures and initiatives taken by The iQ Group Global in the interests of work health and safety.
- l) Not make false or misleading declarations during the performance of their duties or when providing services on behalf of The iQ Group Global. A declaration can be considered to be misleading if information is omitted or presented in a manner that enables a misleading view of the situation to be formed, which includes failure to comply with reporting requirements and falsifying records and other documents.
- m) Refrain from any form of conduct which may cause any reasonable person unwarranted offence or embarrassment or give rise to the reasonable suspicion or appearance of improper conduct or biased performance.
- n) Not act for an improper or ulterior purpose to the detriment (whether perceived or actual) of The iQ Group Global.
- o) Not abuse the advantages of their position for private purposes or solicit or accept any gift or benefit in connection with their employment or engagement which might compromise or be seen to compromise their integrity or The iQ Group Global's reputation, which includes accepting gifts/tickets from vendors, suppliers, customers, potential vendors or suppliers or any other individual (**Gratuity**). Before accepting anything, including a Gratuity, a Workplace Participant must declare the gift and its estimated value to their line manager who will determine if it is appropriate to accept that thing or Gratuity.
- p) Not engage, directly or indirectly, in any form of bribery, including being involved in the payment of any to any third party for the performance, or omission of, that third party's duty.
- q) Not engage, directly or indirectly, in any financial fraud.
- r) Respect The iQ Group Global's ownership of all of its property including but not limited, to funds, equipment, supplies, books, records and confidential information (however described).



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- s) Maintain during and after their employment or engagement with The iQ Group Global, the confidentiality of any information, records or other materials acquired during the employment or engagement with The iQ Group Global.
- t) Not accept any employment with another organisation that is a supplier or competitor of The iQ Group Global, or any other employment that is in conflict with their position at The iQ Group Global.
- u) Not make any unauthorised statements to the media about The iQ Group Global's business, or upload any material on social media that can bring the reputation of The iQ Group Global into disrepute, or where the Workplace Participant can be identified as working for The iQ Group Global (see Social Media Policy).
- v) Not fight in the workplace.
- w) Avoid inappropriate language in the workplace.
- x) Not report for work in circumstances where you could be affected by, or under the influence of, illicit drugs or alcohol (e.g. if you have ingested or otherwise taken drugs or alcohol the night before or in the period leading up to your next work period). If a Workplace Participant is taking prescription medication that may have side-effects which impact on their ability to perform their role or the safety of themselves or others, they must inform their manager at the earliest opportunity. Workplace Participants may be required to produce medical evidence to prove their medication does not affect their capacity to perform their duties in a safe manner without harm to themselves or others.
- y) Not smoke during working hours unless it is during prescribed breaks. Smoking is not permitted in any of The IQ Group Global's offices.

5. Farmaforce

5.1 Samples and Samples Management

From time to time, Farmaforce Workplace Participant's may be required to manage or come into contact with S2-4 drugs or products (**Products**). The Products are provided to Farmaforce via commercial partnerships under strict criteria for distribution to Australian Healthcare Practitioners and, under no circumstances, are to be used, consumed or provided to any third party other than as directed by Farmaforce. The Workplace Personnel must:

- manage the Products according to their correct storage and handling criteria;



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- account for and a clearly document the transfer of possession of the Product;
 - conduct a monthly audit to ensure compliance with Farmaforce’s directives; and
 - immediately notify his or her line manager if there are any abnormalities in relation to the above obligations.
- 5.2 In instances where discrepancies may occur, management may be forced to file police reports to that effect and culpability identified. Failure to comply with these guidelines may lead to disciplinary action, including, summary dismissal.
- 5.3 Privacy and Client Relationship Management (CRM)
- 5.3.1 All information gathered by Farmaforce and The iQ Group Global regarding individuals, organisations and commercial partners are treated with the highest level of confidentiality. Any interaction or entry into the Farmaforce CRM is subject to both State and Federal privacy laws. These include but are not limited to, the way an individual or party discloses some or all of the ways it gathers, uses, discloses and manages a customer or client’s data. Personal information can be anything that can be used to identify an individual, not limited to but including name, address, date of birth, marital status, contact information, ID and expiry date, financial records, credit information, medical history, where one travels, and intentions to acquire goods and services. In the case of our business, it is also related to a declaration on how we collect, store and release the personal information that we collect. To that end, all Farmaforce Workplace Participants having access to the CRM or such information, must treat it with the utmost respect and not in any way abuse or misuse it. Exposure to the Farmaforce CRM or information contained therein must be for the sole purposes of effective customer relationship management and to serve Farmaforce business requirements only.
- 5.3.2 Farmaforce and The iQ Group Global hold employee and client privacy in the highest regard and no information will be unwillingly shared with 3rd parties external to the organisation unless mutual agreement authorises us to do so. Farmaforce Workplace Participants must acknowledge that as part of their employment, clients whom employees may be representing as part of their employment may on occasions request to send role-related information to the Workplace Participant’s home addresses. This information may be, but not limited to, pre-reading materials for the given product and therapeutic area being promoted, promotional mailers, or mirrored mailings of what has been sent to healthcare professionals. Whilst discretion, confidentiality and



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tact will always be deployed, Farmaforce will not be in direct control *of* or responsible for any such material. If any Workplace Participant has an aversion to such content being received at their home mailing address, they must ensure an alternative location is provided to their direct line manager or People & Culture. The email address for People & Culture is: people.culture@theiqgroupglobal.com

6. Expectations of managers

6.1 Managers should:

- a) Promote collaboration and a sense of team spirit.
- b) Foster a culture where Workplace Participants feel comfortable to raise issues or concerns.
- c) Maintain confidentiality so far as is reasonably practicable when conducting investigations into grievances and disputes.
- d) Seek to avoid bias in decision making.
- e) Ensure compliance with The iQ Group Global's procedures when carrying out counselling and performance/conduct reviews.
- f) Be objective when considering any reward or performance/conduct reviews.
- g) Not condone, permit, or fail to report any breaches of the Code as outlined above by Workplace Participants under their supervision.

7. Breaches of this code

- 7.1 A breach of this Code may lead to disciplinary action including, but not limited to, termination of employment or services.



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Variations

The iQ Group Global reserves the right to vary, replace or terminate this Code from time to time.

Associated documents include but are not limited to:

- Anti-discrimination and EEO Policy
- Conflict of Interest Policy
- Dress Personal Hygiene and Grooming Policy
- Employer Property Policy
- Internet, Email and Computer Use Policy
- Leave Policy
- Social Media Policy
- Performance and Misconduct Policy
- Recruitment and Selection Policy
- Whistleblowing Policy
- Workplace Bullying Policy
- Workplace Drugs and Alcohol Policy
- The full suite of The iQ Group's Workplace Health and Safety Policies and Procedures



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POLICY AUTHORISATION

Policy authorized by:	Marcelle Gammal	Position:	Director, People & Culture
Policy authorized by:	Matt Scott	Position:	Director, Human Capital
Policy maintained by:	Clare Sheffle	Position:	Head, Human Capital

REVISION HISTORY

Date	Replaces	Writer	Writer role	Change	Reason for change
1 April 2021	N/A	Marcelle Gammal	Director, People & Culture		Update
1 February 2019	N/A	Matt Scott	Director, Human Capital	N/A	Update.