

Envirolab Business Code of Conduct

1. Purpose and Scope

Envirolab Group and its network of related parties, Envirolab Services Pty Ltd, and Envirolab Services (WA) Pty Ltd trading as MPL Laboratories ('the Envirolab Group', 'us' 'our' 'we'), are committed to perform business in an honest and fair way, that holds true to its core values and in strict compliance with all laws and regulations.

This Business Code of Conduct (Code) was created to communicate our commitment and expectations to our external partners and other third parties on conducting business with or on behalf of Envirolab. This Code is not designed to cover every eventuality but is used to provide guidance.

This Code applies to any company that supplies goods or services to Envirolab.

Our Employee Code of Conduct sets out expectations and guidelines for employees of Envirolab.

2. Values

The Code is founded on Envirolab's core values:

- **Quality:** We endeavour to proactively communicate and drive quality improvements within the business as well as across the industry. This ensures consistency in the delivery of quality work, while also enabling adaptability to change for continuous learning.
- **Reliability:** We pride ourselves on being consistently depended upon to deliver commitments. Our staff proactively go above and beyond to ensure all our clients' expectations are met.
- **Service:** Our service is the backbone of our success. We aim to exceed customer expectations through excellent service and the delivery of quality and timely results.
- **Innovation:** We always strive to redefine the standard of excellence in everything we do. To foster innovation, we encourage the exchange of ideas of our staff - whatever their job area. We are proud to support and interact with academic institutions and the wider community to share information that benefits the continued development of science.
- **Family:** We are under no illusion that the reason we exist is because of our great team. By treating everyone in our company as a family member, not a number, we promote an inclusive work environment.

3. Our Responsibilities

Every day we interact with third parties, which are essential to our success.

Envirolab sets high standards for conducting business ethically and in accordance with the law. This Code helps us build respectful relationships with our external partners and stakeholders.

Our preference is to conduct business with partners that maintain similar standards of conduct.

4. Ethical Business Practices

4.1 Business Integrity

We are committed to conducting our business in accordance with the highest ethical standards.

We must act lawfully, ethically and responsibly at all times. We will not knowingly participate in any illegal or unethical activity.

4.2 Compliance with Laws and Regulations

This Code does not stand alone nor take the place of any legislative or regulatory requirement.

We demonstrate respect for the law and regulations by complying with all applicable Australian Commonwealth, state, territory, and foreign/local laws as directed. Laws and regulations with which Envirolab must comply include (but not limited to):

- Labour and employment laws;
- Securities laws;
- Privacy laws;
- Competition and consumer law;
- Corporate Governance;
- Occupational Health & Safety legislation;
- Anti-discrimination legislation;
- Contractual obligations;
- Taxation, financial risk and settlement processes; and
- Equitable obligations.

Where operating in multiple countries and jurisdictions, compliance is required with all applicable laws and regulations in which the operations are managed, or services are provided.

There is no circumstance acceptable for Envirolab or any of its people to knowingly and deliberately not comply with the law or to act unethically in performing or advancing Envirolab's business.

Envirolab expects employees to report non-compliance with any legislative or regulatory requirements. If a report of non-compliance is made, reasonable steps will be taken to rectify and reduce the likelihood of recurrence. This may include a root cause investigation and disciplinary action taken against relevant parties.

4.3 Conflicts of Interest

Envirolab expects its employees to show absolute loyalty to the business.

All employees must avoid situations in which their personal or financial interests could conflict with those of Envirolab. Envirolab continually monitors for conflicts of interest internally and senior management will assess these conflicts on a case-by-case basis.

Employees should not personally gain any benefits, either directly or indirectly, from their access to confidential information by virtue of their position at Envirolab.

4.4 Gift, Gratuities, Entertainment, and other items of value

Envirolab recognises the exchange of gifts, entertainment and hospitality, and other items in accordance with business practice. We give appropriate gifts and offer reasonable hospitality modestly scaled and clearly for business purposes.

Envirolab, however, prohibits the offering or acceptance of gifts or hospitality in circumstances which could be considered to give rise to a perceived or actual conflict of interest, undue influence, compromise the reputation of Envirolab, or be in breach of other laws.

4.5 Fair Dealing

Envirolab believes in the importance of free competition and choice. Therefore, we are willing to compete effectively in our business environment.

Envirolab's success depends on the continued support of our clients. We act in a partnership with our clients for a mutual long-term benefit. We will compete for business openly and honestly. Prices will be set independently and will never be agreed upon formally or informally with our competitors or at the request of other non-related parties.

Envirolab will also act fair and honest in dealing with external partners, including suppliers. Our purchasing decisions are based on commercially competitive factors, including price, quality, reliability, and the level of service. Our partners are expected to practice the same level of standard in conduct.

4.6 Fraud and Integrity in Financial Reporting

Envirolab is committed to ensuring the integrity and quality of our business record keeping and that our business records are created and managed to give a true and accurate account of our business.

4.7 Anti-bribery and Corruption

Any forms of bribery, corruption, extortion, or embezzlement are completely unacceptable at Envirolab and contrary to our values.

While Envirolab is client focused on the delivery of its services, we have zero tolerance for any breach of the law, ethics, or Envirolab policy to satisfy client requirements, whether stated or implied.

We expect our external partners to comply with applicable anti-bribery and corruption laws.

5. Information Protection

5.1 Intellectual Property

Intellectual property (IP) and other intangible assets related to doing business include patents, trademarks, designs, copyrighted material, and trade secrets.

Envirolab protects its own IP and respects the IP of others.

External partners should also understand their role as custodians of information. IP rights must be respected where all use of equipment, methods, technology, and other confidential information, shall be conducted in a manner that does not endanger the IP of Envirolab.

Please refer to the Privacy Policy for additional guidance and information.

5.2 Privacy and Confidential Information

Envirolab respects and protects the privacy and confidentiality of all information that is entrusted to us. We collect, store, use, transmit and dispose of personal and confidential information in a way that is transparent and promotes trust.

All test data and results are confidential between Envirolab Group and clients. Such information cannot be shared unless allowed or required under relevant laws or regulations or as agreed by the person or organisation whose information it is. Our duty of confidentiality does not end with the movement of our people. Respect for the confidentiality of information remains even after the departure of our people from Envirolab.

External partners shall not use or disclose any information belonging to Envirolab, its existing or prospective clients, suppliers, or any other third parties, except as required under relevant laws or regulation or authorised in writing by Envirolab.

Envirolab's Privacy Policy further outlines our privacy commitment and how we collect, use, disclose and protect personal information.

5.3 Cybersecurity and Data Protection

All hardcopy data, reports, COCs and like documents are filed in secure facilities.

The Envirolab Group's electronic data is backed up daily and stored off-site.

Remote access into the Envirolab Group's systems is secured using a Virtual Private Network (VPN) and access is controlled using Multi-Factor Authentication (MFA).

Computers on-site are only accessible through individual passwords, and the Laboratory Information Management System (LIMS) is password protected.

Continual monitoring and logging are performed by the Envirolab Group's security systems.

Envirolab's Information Security Policy further details compliancy with the requirements of ISO using a maintained and continually improved Information Security Management System (ISMS) consolidated into an Integrated Management System (IMS).

Our Privacy Policy also provides additional guidance and information on our privacy commitment and how we collect, use, disclose and protect personal information.

For External partners that have access to our equipment while working with us, we expect full compliance with this section, including the protection of Envirolab's cybersecurity and data. External partners are also expected to:

- Affirm its management of cybersecurity, data protection and all personal information with relevant privacy and securities laws and industry practice;
- Maintain a risk assessment covering cybersecurity and data protection;
- Apply, with proportionality, a cybersecurity program that identifies and remediates any weaknesses as a matter of routine; and
- Demonstrate ongoing commitment to managing cybersecurity and data protection risk.

6. Operations and Management

6.1 Quality Assurance

Envirolab operates in a highly regulated sector and has rigorous quality standards.

Our people are committed to consistently provide professional services built on robust planning, processes and procedures, quality control and continuous improvement.

Envirolab's Quality Policy further outlines our ISO certification, using a maintained and continually improved Quality Management System, consolidated into an IMS.

Third party suppliers are continually monitored to meet an acceptable level of service to maintain Envirolab's quality values.

6.2 Health and Safety

Protecting the health and safety of our people is part of our culture, and we strive to ensure a safe, professional workplace, in which, all our staff, external partners and other third parties feel a sense of pride in being part of and contributing to the success of our organisation.

Envirolab is committed to providing resources and expectations in terms of facilities, equipment, expertise and training that take account of health and safety and that ensure our team is appropriately supervised to protect their wellbeing.

Ongoing training additionally fosters a risk-informed cultural mindset and engagement of our employees, who individually accept the health and safety responsibilities of their role within the business. Our Work Health and Safety Policy further details our ISO certification, using a maintained and continually improved Work Health and Safety Management System, consolidated into an IMS.

If Envirolab employees are required to visit an external partners site, they must provide Envirolab employees with a healthy, safe and secure workplace.

6.3 Environmental Management

Envirolab is committed to promoting environmental responsibility. Our Environmental Policy further outlines our compliance with ISO standards, using a maintained and continually improved Environmental Management System, consolidated into an IMS.

Equally, external partners are expected to adhere to applicable environmental regulations and conduct their operations in such a way that supports responsible and sustainable environmental behaviour and minimises a negative impact on the environment.

6.4 Third Party Certification

As Envirolab continues to grow, innovate and evolve as an organisation, our strategic aim is to maintain and surpass the requirements of our third-party certification.

Fulfillment of these corporate goals and objectives is achieved by having full management support, commitment, and the efficient allocation of resources.

By maintaining certification, we strive to improve our systems and processes on an ongoing basis whilst upholding a high compliance level. Our employees are aware of our certification bodies and how their contributions can have an impact on the success of the re-certification process and business requirements.

6.5 Business Continuity

External partners are expected to maintain adequate business continuity provisions to continue providing products or services to Envirolab, in the event of an operational crisis, including but not limited to the disruption caused by natural disasters, environmental catastrophes, physical and cyber terrorism, scams and major IT or system failures and pandemics.

7. Our Rights

7.1 Discrimination, Diversity and Harassment

As an equal opportunity employer, Envirolab is committed to ensuring a safe workplace environment for our staff free from discrimination, diversity and harassment, including sexual, physical or verbal harassment or other demeaning behaviour against any individual or group of people. Envirolab does not tolerate violence or threats of violence. It is committed to the fair and equal treatment of all our employees to ensure their safety and wellbeing.

Our partners play an equally important role in creating an open and inclusive workplace. As such, we value partnering with businesses that have policies in place that encourage diversity and ensure equal employment opportunities for all people.

Refer to the Equal Opportunity and Ant-Discrimination Policy for further information.

7.2 Human Rights

Envirolab upholds the human rights of employees and treats our team with dignity and respect.

As such, Envirolab seeks to work with external partners, whose values and standards for conducting business, are aligned with applicable laws, standards, regulations and industry codes related to accepted ethical standards for the protection of human rights and labour practices. Envirolab fully supports and seeks to comply with policies and practices that are aimed at promoting human rights.

7.3 Modern Slavery

Envirolab is committed to ensuring that our operations and supply chains do not engage in modern slavery practices. In doing this, we fully support the Modern Slavery Act 2018.

Where appropriate, we implement prevention, mitigation, and remediation processes. Envirolab has made a voluntary commitment in its submission of a Modern Slavery Policy Statement in accordance with the Australian Federal Government requirements.

External partners are obligated to be aware of and comply, under a reasonable basis, with applicable laws and directives on this subject in the jurisdictions in which they operate.

Refer to the Modern Slavery Policy for further information.

8. Social Responsibility

8.1 People

Envirolab is committed to providing a safe and healthy workplace for our employees, clients, external partners, visitors and members of the community.

Envirolab provides a range of benefits to support employee health and wellbeing.

Envirolab provides an Employee Assistance Program (EAP), to provide our staff and their immediate families with professional counselling services for work and non-work-related personal issues.

In meeting this corporate objective, Envirolab files a yearly report with Workplace Gender Equality. Staff responsible for hiring new team members perform the task in an unconscious unbiased manner. The majority of Envirolab senior staff are women. There is no salary wage difference between male and female employees. Rather, we recognise our staff on merit through performance and annual salary reviews and service awards upskilling and ongoing training, flexible working arrangements, regular social activities, and networking opportunities.

8.2 Domestic and Family Violence

Envirolab has a zero tolerance of domestic and family violence. Every individual has a responsibility for creating a positive cultural change towards domestic and family violence. We will fully support any employee affected by domestic and family violence either through our Employee Assistance Program (EAP) or by any means possible.

Our EAP allows staff and their families free counselling sessions in a confidential and safe environment.

8.3 Supply of Goods

Envirolab will use their best endeavours to do business with ethically, environmentally and socially responsible suppliers. As part of this commitment, Envirolab will not procure dumped goods or engage suppliers suspended as a result of accruing demerit points under the Ethical Supplier Mandate.

8.4 Planet

Envirolab is conscious of its environmental impact and is committed to continually improving our environmental performance and moving towards best practices in corporate sustainability.

We have implemented initiatives in reducing waste to landfill, energy consumption, use and quantity of raw materials and investing heavily in renewable energy and our recycling capacity. Internally, we minimise energy consumption and paper wastage by promoting the maximum use of electronic communication and data management, and recycling paper, batteries, and printer cartridges.

We aim to buy local and raise awareness with our staff about sustainably sourced and environmentally friendly products.

8.5 Community

We actively sponsor fitness events in our local communities and partake in national charitable events raising funds for good causes.

Envirolab plays a key part in offering students the opportunity of work experience or student tours of the facilities. We aim to engage these young scientific minds knowing that they are potential employees and leaders of the future.

Our many programs and mentoring services that we provide help the students obtain the skills and support they need to transition into the workforce. We are a strong supporter of RACI mentoring program and CSIRO science in school programs and have built up key relationships with leading universities with a 2-way support programme.