

Melbourne IT Code of Conduct

Melbourne IT has five key values which it requires in the conduct and behaviour of its employees, executives and directors:

- 1) Integrity
- 2) Excellence
- 3) Collaboration
- 4) Innovation
- 5) Commercial discipline

These five values drive Melbourne IT in its pursuit of the following four aims:

- 1) Results delivery
- 2) Customer First
- 3) Process optimization
- 4) Providing Leadership
- 5) Development of our people

Integrity

To act with integrity at all times, and towards each other, our customers, our suppliers and our shareholders, we must:

- act honestly and within the spirit as well as the letter of the law
- obey the law and not take any action (or inaction) that will (or could) result in the breach of any law
- respect the rights and freedoms of each other and not discriminate on the basis of age, sex, race, religion, sexual orientation, political opinion or other personal differences
- treat our work colleagues, our customers and shareholders with courtesy and respect.
- not disclose any confidential information of Melbourne IT, its customers, suppliers or other parties without proper authorisation
- deal with our customers, suppliers, shareholders and any other parties honestly, fairly and at arms length, and otherwise avoid the possibility of actual or perceived conflicts of interest
- follow Melbourne IT's internal policies, including Melbourne IT's delegation of authority guidelines and corporate governance policies
- not permit our own personal and/or business and/or financial interests to conflict with our duties to Melbourne IT
- encourage and foster a culture that recognises the importance of professional ethics

Excellence

To achieve excellence in everything we do, we must:

- work to the highest standard
- be constantly challenged and challenge each other to continue to drive improvement in our work
- strive to achieve a vibrant and rewarding work environment
- take ownership of every task or duty we undertake
- take responsibility for our own actions
- optimize processes

- encourage, maintain and foster a culture that strives for, and rewards, excellence

Collaboration

To collaborate and co-operate with each other to achieve a common goal we must:

- effectively and openly communicate with each other
- assist each other where we can to improve the skills and personal development of each other via support, coaching and mentoring
- focus on the task to be achieved and not let personal issues or interests interfere
- respect different views
- encourage, maintain and foster a culture that recognises and values teamwork

Innovation

To be innovative in achieving solutions and problem-solving we must:

- value new ideas and be open to change
- be prepared to “think beyond the square” in everything we do
- seek and be responsive to customer feedback
- encourage, maintain and foster a culture of innovation

Commercial Discipline

In applying commercial discipline in all our work practices we must:

- measure our success in terms of increasing shareholder value
- appropriately manage risk
- apply sound principles of financial and business management

Our Policy for Reporting Wrongdoing

Melbourne IT is committed to ensuring that the conduct and behaviour of its employees, executives and directors is in accordance with the five key values described above.

Melbourne IT employees, executives and directors are all required to report any circumstance where they have reasonable grounds for suspecting, and a genuine belief of wrongdoing involving possible:

- fraud
- corruption
- breaches of Melbourne IT’s internal policies, including Melbourne IT’s delegation of authority guidelines and corporate governance policies (which include this Code of Conduct)
- breaches of the law

Any such occurrences may be reported to:

- a) your line manager; or if you are not comfortable reporting the matter to your line manager, or if the matter requires escalation, the Legal Counsel and Company Secretary; or
- b) if you are not comfortable reporting the matter to the Legal Counsel and Company Secretary, or if the matter requires escalation, the CEO; or
- c) if the matter is of such a sensitive nature that you are not comfortable reporting it to either an executive of Melbourne IT, or the CEO, the Chairman.

Melbourne IT recognises that its employees, executives and directors must be provided with a

work environment in which they feel safe and secure about reporting any such occurrence.

Accordingly, Melbourne IT is committed to encouraging, maintaining and fostering a culture in which Melbourne IT employees, executives and directors feel that they may report any such instances where they have reasonable grounds, and a genuine belief, that there may have been wrongdoing without fear of reprisal, harassment, discrimination, victimization or future career bias.

Any report made will be listened to and investigated. All reports will be treated with the strictest confidence and will only be disclosed to other persons within (or outside) Melbourne IT on a "need-to-know" basis. Your involvement will not be mentioned without your consent. You will be provided with regular feedback and the outcome of the investigation (including whether the suspicions and concerns outlined in your report were well-founded, and, where appropriate, whether further action has been taken).

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 for you to give evidence in either internal or external proceedings, or, the law may otherwise require the formal disclosure of your report.

It must also be stressed that Melbourne IT will 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 Melbourne IT as grounds for action against the complainant.