

## **IDT Australia Limited – Code of Conduct**

### **1. Mission, Vision, and Values**

#### Mission

IDT Australia Ltd (“IDT” or “Company”) is a publicly listed pharmaceutical manufacturing company, built on specialist technical expertise and a mission to innovate pharmaceutical solutions (Active Pharmaceutical Ingredient through to Finished Dose Form), excelling in difficult to manufacture and high-containment products.

#### Vision

To develop and manufacture pharmaceutical products to improve the health of patients worldwide.

#### Values

We believe in quality in everything we do, and we are committed to best-practice governance, quality assurance and global compliance methodologies. We strive to innovate optimal solutions for our clients and partners, promoting efficiency, timeliness and responsiveness. We promote a specialist culture of integrity, ownership, ambition for excellence and results.

### **2. Code of Conduct**

Our employees contribute to the success of our organisation and that of our clients. Our employees have an obligation to the business, our clients and themselves to observe high standards of integrity and fair dealing. Unlawful and unethical business practices undermine employee and client trust.

Our Code of Conduct policy applies to all of the Company’s personnel (including directors, senior executives and employees) and provides the framework of principles for conducting business, dealing with other employees, clients and suppliers. The Code of Conduct does not replace legislation and if any part of it is in conflict, then legislation takes precedence. IDT personnel will act consistent with our values and in the best interests of IDT.

IDT personnel will:

- Act and maintain a high standard of integrity, ethics and professionalism;
- Be responsible in the proper use of Company information, funds, equipment and facilities;
- Treat fellow staff members with respect and not engage in bullying, harassment or discrimination;
- Be considerate and respectful of the environment, company stakeholders and the community;
- Exercise fairness, equality, courtesy, consideration and sensitivity in dealing with other employees, clients and suppliers;
- Avoid actual or apparent conflict of interests, promptly disclosing to an IDT senior manager, any interest which may constitute a conflict of interest and deal appropriately with any conflicts between their personal interests and their duties as a director, senior executive or employee;
- Not take advantage of the property or information of IDT or its customers for personal gain or to cause detriment to IDT or its customers;
- Not take advantage of their position or the opportunities arising therefrom for personal gain;
- Promote the interests of IDT;
- Perform duties with skill, honesty, care and diligence;
- Abide by policies, procedures and lawful directions that relate to your employment with IDT;
- Avoid the perception that any business transaction may be influenced by offering or accepting gifts;
- Under no circumstances may employees offer or accept money;

- Comply with all laws and regulations that apply to IDT and its operations; and
- Any member of personnel, who in good faith, raises a complaint or discloses an alleged breach of this Code of Conduct, whilst following correct reporting procedures, will not be disadvantaged or prejudiced. All reports will be dealt with in a timely and confidential manner.

IDT expects co-operation from all personnel in conducting themselves in a professional, ethical and socially acceptable manner of the highest standards.

Any personnel in breach of this Policy may be subject to disciplinary action, including termination.

Should any personnel have doubts about any aspect of this Code of Conduct, they must seek clarification from their Line manager, Department Manager or People and Change.

This Code will be periodically reviewed to check that it is operating effectively and whether any changes are required to the Code.

### **3. Comply with the Law, Policies and any Lawful Direction**

All personnel of IDT must comply with all legal, industrial and administrative requirements and any lawful direction made by a person with the authority to give such a direction.

Personnel are to comply with relevant laws, policies and procedures to know and understand the law applicable to the performance of their duties. It is the responsibility of the Executives and managers to ensure;

- Personnel are informed about the key legal requirements relevant to their role;
- Personnel are aware of the potential repercussions of non-compliance; and
- Appropriate record keeping systems and practices that capture evidence of compliance and non-compliance are in place.

### **4. Treat Everyone with Respect**

IDT personnel and those acting on behalf of IDT are to treat everyone with respect. This includes refraining from discriminating, harassing, bullying or sexual harassment behaviour or treating anyone inappropriately including colleagues, employees, suppliers or customers.

Personnel must not discriminate against a person because of race, ethnic or national origin, sex including breastfeeding, age, marital status, pregnancy, political or religious beliefs or responsibilities as a carer. Such discrimination may be unlawful.

All personnel should be familiar with and comply with the Discrimination, Bullying, Harassment & Sexual Harassment Policy which is available in the IDT Library.

### **5. Dealing with Media**

The Chairman and CEO are the only personnel authorised to deal with the media (radio, television and press). To ensure that the media receive consistent and accurate information, and ensuring that confidential information is not released, personnel should respond to any media request by firstly advising that an appropriate member of personnel will call back and secondly by informing their Manager of the request.

All media enquiries should be directed to the CEO.

## **6. Refrain From Public Comment Regarding IDT Australia Ltd**

Personnel must not, in a work capacity make public comment without authorisation on matters related to IDT. Public comment includes public speaking, comments in the media or publications.

## **7. Respect Privacy & Maintain Appropriate Confidentiality of Information**

Personnel must not (either during or after their employment with IDT) use confidential information obtained in the course of their employment, to gain any direct or indirect benefit or other improper advantage for them or any other person. Use of such information may be a criminal offence. Personnel and their work must not be influenced by plans for, or offers of, employment outside of the business.

## **8. Corruption or Maladministration**

Managers and supervisors have an obligation to, and other personnel are encouraged to report to management any suspected corruption or unlawful conduct, maladministration or serious and substantial waste of resources. Refer to Whistle Blower Policy.

## **9. Exercise Diligence, Care and Attention in Work**

Personnel must give appropriate time and attention to carrying out their work efficiently, economically, and effectively. This means paying due care, attention, and diligence to duties, fulfilling them and reasonably supporting other employees in their endeavours to do the same.

Personnel should keep up to date with advances and changes in areas of expertise and look for ways to improve performance and achieve high standards of performance.

## **10. Review Of Policy**

This Policy is reviewed on a periodic basis. However, the Board will review this Policy as often as the Board determines appropriate and make any changes it determines necessary or desirable.

<b>Last Review Date:</b>	26 October 2023
<b>Approval Date:</b>	23 November 2023
<b>Next Review on or before:</b>	November 2025