

# Ambertech Limited Code of Conduct



## Contents

1. Purpose
2. Scope
3. How we do Business
4. Compliance with Laws
5. Work Environment
6. Ambertech Shares
7. Media and External Stakeholders
8. Conflicts of interest
9. Gifts and Gratuities
10. Privacy and confidentiality
11. Company Property
12. Breach of the Code
13. Administration

### 1. Purpose

The Board of Ambertech Limited recognises that it has a responsibility to set the ethical tone and standards of the company, and to enhance stakeholder confidence by articulating acceptable practices for directors, executives and employees of the company.

The Board has adopted the following policy to set out the values and policies of the company to assist senior executives in implementing practices consistent with those standards, and which complement the company's risk management practices.

### 2. Scope

This policy applies to all directors, officers and employees of Ambertech and its subsidiaries.

### 3. How We Do Business

As one of Australasia's largest and most respected suppliers of sound & vision equipment and solutions, our goal is to provide our clients with the most technically advanced and cost-efficient solutions to their requirements and to build long-term business relationships based on the provision of innovative customer and market-focused solutions.

To prosper and achieve real growth, we strive to:

- Actively manage and build our portfolio of high quality assets and services.
- Continue the drive towards a high performance organisation in which every individual accepts responsibility and is rewarded for results.
- Earn the trust of employees, customers, suppliers, communities and shareholders by being forthright in our communications and consistently delivering on commitments.

At Ambertech, we value:

- Safety and the Environment — An overriding commitment to health, safety, environmental responsibility and sustainable development.
- Integrity — Including doing what we say we will do.
- High Performance — The excitement and fulfillment of achieving superior business results and stretching our capabilities.

## Ambertech Limited Code of Conduct



- Win-Win Relationships — Having relationships which focus on the creation of value for all parties.
- The Courage to Lead Change — Accepting the responsibility to inspire and deliver positive change in the face of adversity.
- Respect for Each Other — The embracing of diversity, enriched by openness, sharing, trust, teamwork and involvement.

We recognise that we are successful in creating value when:

- Our shareholders are realising a superior return on their investment.
- Our customers and suppliers are benefiting from our business relationships.
- Every employee starts each day with a sense of purpose and ends each day with a sense of accomplishment.

#### 4. Compliance with Laws

At Ambertech we are committed to acting fairly and honestly in all dealings with suppliers, customers and the community. We are committed to complying with the law whenever we do business. Ambertech employees are expected to:

- Act in accordance with the law;
- Carry out their duties in accordance with this Code and other Ambertech policies and procedures that apply;
- Participate in relevant compliance training programs as offered by Ambertech; and
- Contact their manager or the Company Secretary if they are uncertain about their compliance obligations.

#### 5. Work Environment

Ambertech is committed to providing a work environment that is safe, fair and free from discrimination for all employees, and others who come within our working environment. Ambertech recognises that its staff is its most valuable asset and as such we strive to provide a safe and productive work environment.

The management of Ambertech has developed a system of policies that are clear and well communicated to all employees, including the following:

- Occupational Health and Safety Policy
- Harassment and Anti-Discrimination Policy
- Alcohol Policy
- Clothing and Footwear Policy
- Smoke Free Policy
- Internet Usage Policy

Ambertech considers evolving community expectations, management practices, and technological changes to continuously improve its system of OH&S policies and performance.

#### 6. Ambertech Shares

The Board of Ambertech Limited recognises that directors, senior executives and other employees may hold shares in Ambertech and that most investors are encouraged by these holdings.

The Board has adopted a Securities Trading Policy in relation to directors, senior executives and employees buying and selling Ambertech shares to identify and raise awareness about the prohibitions under the law and the requirements of that policy. The securities trading policy covers specific issues such as insider trading laws and trading blackout periods and a copy is made available to all employees.

Reissued September 2020

## Ambertech Limited Code of Conduct



### 7. Media and External Stakeholders

As an ASX listed company Ambertech may be watched by media, industry associations, community groups and regulators. The way in which Ambertech employees conduct themselves at work, and the decisions they make can have a direct impact on the company's reputation.

The Board has adopted a Continuous Disclosure and Communications Policy to:

- Assist Ambertech in complying with its continuous disclosure obligations under the Corporations Act and the Australian Securities Exchange ("ASX") Listing Rules;
- Establish a framework to enable Ambertech to provide shareholders and the market generally with timely, direct and equal access to relevant information about Ambertech; and
- Promote investor confidence in the integrity of Ambertech and its securities through the application of disciplined disclosure procedures by its directors and employees.

The policy covers important specific issues relating to, but not limited to:

- Media and press announcements,
- Shareholder communications,
- Discussions with shareholders, analysts, and advisors
- Media and market speculation, and
- Chatrooms, blogs and social networking site protocol.

The policy is subject to periodic review and a copy is made available to all employees.

### 8. Conflicts of Interest

Ambertech is committed to managing, and where required, avoiding conflicts of interest. All employees of Ambertech are expected to declare any interest they might have that could adversely affect the company. It is expected those Ambertech employees:

- Not allow personal interests to conflict with the interests of Ambertech;
- Avoid participating in decisions and activities which may conflict with their duties and responsibilities to Ambertech;
- Obtain written permission before accepting a position within another company, business or organisation which may be seen as giving rise to a conflict of interest;
- Not take part in any decision-making process which relates to a conflict that they are involved in; and
- Not accept or offer gifts where doing so could influence a business decision or create an obligation, or compromise impartiality.

### 9. Gifts and Gratuities

Ambertech is committed to ensuring that all business relationships are legal and based on professional integrity. As a matter of company principle, we do not receive gifts and gratuities.

We understand, however, that small tokens of goodwill may be exchanged between us and our business partners on special occasions, such as Christmas, and that from time to time there may be invitations to a social, sporting or cultural event that may be appropriate. If an employee receives a gift or invitation they should declare it to their manager.

Accepting some types of gifts and gratuities like bribes, inducements, special personal discounts or merchandise, however small, could embarrass and employee and compromise Ambertech. In some cases, these could be interpreted as fraud.

Reissued September 2020

## Ambertech Limited Code of Conduct



If employees are unclear about what is acceptable they should speak to their manager or the Company Secretary.

### 10. Privacy and confidentiality

Under privacy laws, Ambertech has a number of obligations concerning personal information it collects from individuals, such as our customers. These laws cover disclosures Ambertech must make to our customers when it collects their personal information, how it may use that information, what it must do to protect that information and when it must delete or de-identify it.

All Ambertech employees are expected to:

- Only use information for the reason it was given to Ambertech;
- Only share information with other employees on a need to know basis;
- Not share information with someone else without the owner's permission; and
- Immediately return any confidential information which inadvertently comes into their possession.

### 11. Company Property

Ambertech aims to provide the necessary tools to all employees to do their job, and this means employees may be given access to assets belonging to the company, including items such as:

- Cash;
- Plant and equipment;
- Stock and merchandise;
- Company information; and
- Computers, software and telephones.

Ambertech employees are expected to:

- Ensure that assets of the company are only used for legitimate business purposes (limited use of computers and telephones is allowed providing it is efficient and prudent);
- Report any suspected or actual theft to their manager or the Company Secretary.

### 12. Breach of the Code

The content of this Code is designed to focus Ambertech employees on the values central to the integrity of the company. Employees are expected to report suspected breaches of this Code or any related policy to their manager or the Company Secretary.

Ambertech takes any breach of this Code or related policy seriously. Matters raised will be investigated and appropriate action taken in respect of any actual breach of the Code.

### 13. Administration

A copy of this Code is available to all employees and a copy is on the company's website. Further information is available from the Company Secretary. The Code is subject to review by the Board of Ambertech and may be amended from time to time.