

## BCAL Diagnostics Limited

### Code of Conduct

This Code of Conduct (**Code**) sets out the ground rules for the way we work at BCAL Diagnostics Limited (**BCAL**). We place great importance on honesty, integrity, quality, and trust, and we are all expected to adhere to the behavioural standards set out in this Code whenever we are acting as representatives of BCAL. The code applies to all employees, directors, and any consultants or contractors while engaged on BCAL business.

While this Code does not contain a comprehensive list of acceptable ethical behaviour, it will help us to make decisions in our day to day work - whoever we are, whatever we do and wherever we do it. If you are ever in doubt about whether you are doing the right thing or need more information, talk to your manager.

#### Our Statement of Values

Each of us is responsible for our own behaviour and we all need to take accountability for the choices we make. In making informed choices, we must have regard to BCAL's values:

- We are professional
- We treat all people with respect
- We keep our workplace safe and sound
- We steer clear of conflicts of interest
- We protect confidentiality and privacy
- We act morally and in accordance with the law
- We are good corporate citizens
- We respect and use BCAL's assets for proper purposes
- We respect this Code

### 2. We are professional

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BCAL's shareholders, stakeholders and the community expect everyone who works at or for BCAL to act professionally, ethically and responsibly. We always strive to meet these expectations and to support others to do the same. We do not tolerate dishonest behaviour from anyone we deal with, and we act with integrity. We undertake our duties with care and diligence and in accordance with all policies of the Company. We deal fairly and honestly with each other, and with third parties.

### 3. We treat all people with respect

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We foster a safe working environment that is inclusive and promotes wellbeing. We treat everyone we deal with at work with dignity and respect. We are familiar with and comply with our employment policies. Inappropriate behaviour, including harassment, discrimination, bullying and intimidation, will not be tolerated under any circumstances.

Employees of BCAL must not engage in harassing, discriminatory or bullying behaviour towards any other employee, consultant, advisor or other person with whom they may engage



in the course of their employment. BCAL does not tolerate such behaviour and may take disciplinary action up to and including dismissal against any employee who:

- participates in harassing, discriminatory or bullying behaviour; or
- victimises or retaliates against an employee who has lodged a complaint about harassment, discrimination or workplace bullying.

Discrimination or harassment based on race, colour, religion, gender, age, marital status, disability or other factors unrelated to legitimate business interests, will not be tolerated.

- We are all entitled to our personal preferences in private or political matters. No pressure should be placed on anyone to influence those preferences and no approval or disapproval of anybody's private or political preferences or activities should be shown by anyone in their role at BCAL.

Employment and advancement decisions within BCAL are based upon merit, qualifications and competence and will not be issued or affected by unlawful discrimination, including on grounds of gender, age, marital status, sexuality, parental status, pregnancy, physical features, disability or impairment, ethnic origin or religious, political or other beliefs.

#### **4. We keep our workplace safe and sound**

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BCAL is committed to ensuring a safe working environment for all employees and this includes complying with all applicable laws, regulations, company policies and record keeping requirements to avoid workplace injuries. If we see something unsafe, we say something.

#### **5. We steer clear of conflicts of interest**

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We make sure our individual interests do not interfere with BCAL's interests, and we immediately disclose to our managers any business or personal relationships we have which might impact, or appear to impact, BCAL's decision making processes. The perception of a conflict of interest can do as much damage to BCAL's reputation as an actual conflict of interest, so we always keep an arm's length relationship when dealing with stakeholders, suppliers or partners.

#### **6. We protect confidentiality and privacy**

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In our work at BCAL, we are entrusted with private and confidential information relating to BCAL, colleagues, suppliers, stakeholders and other third parties. We respect the sensitive nature of this information, and understand that misuse of this information could have severe consequences for those whose information is misused. We protect all private and confidential information entrusted to BCAL, and we never misuse it. We act in accordance with BCAL's privacy policy at all times.

#### **7. We act morally and in accordance with the law**

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We act honestly and with the highest standards of personal integrity at all times.

BCAL complies with the Australian anti-bribery legislation. Among other things, this prohibits employees from bribing any public official, government, or other individual – regardless of nationality or local custom – to secure any concession, contract, or favourable treatment for the Company or any of its entities or the employee. Bribes include any kickbacks or other unlawful payments.



We reject and do not seek any improper payments, benefits or gains of any kind that may be offered. We don't do anything which might suggest that we are giving preferential treatment to a person or company that is offering a reward or gift. We only entertain customers and business associates in a manner approved by the Board and management, which includes avoiding any actual or perceived conflicts of interest.

BCAL is subject to laws and regulations in all the locations in which we operate. We stay up to date and comply with all applicable laws, and otherwise act honestly and in good faith at all times. We respect the customs and business practices of the countries in which we operate while not compromising the principles embodied in this Code.

## **8. We are good corporate citizens**

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We care about our stakeholders, our shareholders and our staff. We meet our responsibilities to our immediate community (those with whom we directly interact) and respect the interests of the wider community in our activities.

We are all responsible for maintaining and protecting the environment. We should, therefore, always consider the impact of our activities on the environment and the local community, including the way in which waste is disposed, chemicals are used and stored, and natural resources utilised.

## **9. We respect and use BCAL assets for proper purposes**

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BCAL's assets, including goods, money, intellectual property or the services of BCAL employees and contractors, must not be used for personal gain. This includes, but is not limited to:

- improper use of BCAL's company information;
- improper use of BCAL's clients' information;
- transcription of computer software programs, regardless of whether or not the programs are protected by copyright;
- falsification or improper use of corporate cards, expense accounts or other similar accounts; and
- unauthorised use of the BCAL logo/trademark.

BCAL's property is not to be removed from BCAL's premises without authorisation. Every employee, while in control of any BCAL assets, is personally responsible for them.

## **10. We respect this Code**

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Each of us has a responsibility to abide by this Code and its principles, and to report any conduct that may be in breach of the law, this Code or any other BCAL policies. This means we are conscious of what others around us are doing, and we honestly report all actual and suspected breaches to management or human resources. Anyone who breaches this Code may face disciplinary action including termination of their employment or engagement with BCAL. However, no action will be taken against a person reporting a suspected breach in good faith.

## **11. Breaches of the Code**

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Any breaches of this Code must be reported to the Chair of the board of directors. Any material breach of the Code will be reported to the board of directors.



## **12. Review of the Code of Conduct**

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This Code will be reviewed every two years by the board of directors to check that it is operating effectively and consider whether any changes are required to the Code.