



**GLOBE INTERNATIONAL LIMITED (“Globe”)  
CORPORATE CODE OF CONDUCT**

In accordance with the recommendations of the Australian Securities Exchange’s principles of good corporate governance, Globe recognises the importance of lawful and ethical behaviour in all of its business activities.

***General conduct***

Globe requires that everyone who works for the company, and everyone who acts on its behalf, adhere at all times to these corporate conduct principles, applying the highest standards of behaviour whilst exercising good judgement and common sense.

***Lawful and ethical conduct***

Globe requires directors, employees, contractors, suppliers and athletes associated with Globe to act with whom they deal in a business context fairly, courteously, ethically, responsibly and lawfully. In particular, Globe emphasises that just because an act is lawful, it does not mean it is ethical. Accordingly Globe requires its people to act ethically at all times.

***Conflict of interest***

Directors and employees of Globe will act in the best interests of Globe objectively and effectively disclosing and / or avoiding interests that potentially interfere or conflict with Globe or the interests of Globe. Where there is a conflict of interest, Globe has policies in place to ensure that any resulting transaction is disclosed to the executive team and conducted on an “arms-length” basis or better than an “arms-length” basis, in favour of Globe.

***Fair and safe work environment***

Globe is committed to providing its workforce with a fair, diverse, inclusive and safe work environment. Globe’s policies in relation to these matters are set out in its employment and occupational health and safety policies. In particular, Globe considers any form of bullying, harassment (including sexual harassment), gender bias and racial vilification as serious breaches of its policies.

***Anti-bribery and anti-corruption policy***

Offering a bribe to a government official and the receipt of a bribe from a government official is prohibited under Australian law and the laws of most countries. These laws allow for criminal prosecution of persons or corporations involved in bribery.

A bribe includes, any financial or other inducement or reward for action, which is illegal, unethical, a breach of trust or improper in any way. Bribes can take the form of money, gifts, loans, fees, hospitality, services, discounts, the award of a contract or any other advantage or benefit that is intended to influence a decision or action.

Corruption includes any form of abuse of power for business and/or personal gain and may include, but is not limited to, bribery.

Globe’s directors, employees and contractors are strictly prohibited from making payments or payments in kind (gifts, favors, etc.) to influence individuals to award business opportunities to Globe or make business decisions in Globe’s favor. Similarly, receipts of cash or receipts of significant gifts, favors etc. from suppliers by Globe’s directors, employees and contractors is strictly prohibited under Globe’s supplier related policies. There is an allowance for the acceptance or offering of insignificant gifts, such as give-aways but under Globe’s policies all such gifts must be disclosed to senior management. Any employee or director who breaches this policy (or the spirit of this policy) will face disciplinary action, which could result in instant dismissal. Any non-employee who breaches this

policy may have their contract terminated with immediate effect. Where a breach of this policy amounts to an offence, under anti-bribery legislation the person concerned may also face criminal prosecution.

### ***Ethical sourcing***

Globe is committed to ethical sourcing in all its operations and requires its employees who are directly involved in sourcing and its suppliers to sign off on its Ethical Sourcing Policy, which is available [here](#). As part of this policy and addressing the risk of modern slavery, Globe's suppliers are required to provide a minimum level of working conditions for all of their employees, contractors and sub-contractors (collectively "workers"), as outlined below:

- Workers should be treated with dignity and respect and be provided a safe and healthy workplace, including reasonable working hours.
- Suppliers must not:
  - Use child labour.
  - Use prison, convict, slave, indentured, bonded or other forced labour.
  - Employ unlawful discrimination practices.
  - Provide compensation for workers that is below the minimum requirement according to local laws relating to minimum wages, overtime and mandated benefits.
- Suppliers must comply with all applicable environmental laws and regulations. In addition, suppliers are encouraged to follow sustainable practices, including the sourcing of sustainable raw materials for use in the manufacture and packaging of our products.

### ***Privacy***

Globe's Privacy Policy is available [here](#) and regulates the handling of any personal information that Globe collects in Australia. Globe has similar policies in each overseas jurisdiction in which it operates. Globe's Privacy policies specifically require all employees and contractors to handle private information of individuals with great care, and in accordance with the local privacy laws of the country in which Globe operates.

### ***Whistle Blower Policy***

Globe has in place a Whistle Blower Policy that encourages its directors, employers, contractors and certain eligible external parties to report a disclosable matter without fear of disciplinary action, reprisal or detriment. A disclosable matter is any concern (actual or suspected) about the conduct or deliberate concealment of conduct including theft, fraud, financial irregularity, bribery, corrupt conduct, criminal conduct, failure to comply with any legal or regulatory obligation, unfair or unethical dealing with a customer, supplier or contractor, breaches of Globe's policies and offences against any other law of the Commonwealth that is punishable by imprisonment for a period of 12 months or more. A copy of Globe's Whistle Blower Policy is available [here](#).

### ***Other policies regulating employee behaviour***

All Globe employees are required to comply with Globe's Employment and Occupational Health and Safety policies. These include share trading rules, confidentiality of Globe's information, proper uses of Globe's IT resources and proper engagement with social media.

### ***Consequences***

Failure to adhere to these corporate conduct principles will lead to disciplinary action that may result in termination of employment or a business relationship in a serious case.

### ***Monitoring, compliance and review***

Globe monitors compliance with these principles by continuous internal review of all aspects of its business operations so far as they concern matters of ethical and lawful business behaviour, overseen by Globe's senior management and its board of directors.

This code of conduct is reviewed on a regular basis by Globe's senior management and updated as required.