



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

Globe recognises the importance of lawful and ethical behavior in its business activities. This Code of Conduct is in place to set the basic principles of good corporate governance, which are designed to ensure it promotes lawful and ethical behavior in its business activities. Globe requires that everyone who works for, and acts on behalf of, it is aware of these basic principles and understands their individual responsibilities to uphold these principles.

General conduct

Globe requires that everyone who works for the company, and everyone who acts on its behalf, always adhere to these corporate conduct principles, applying the highest standards of behavior 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 emphasizes that just because an act is lawful, it does not mean it is ethical. Further principles relating specifically to ethical sourcing are outlined below.

Conflict of interest

Directors and employees of Globe will always act in the best interests of Globe and will disclose or avoid any 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, diverse, inclusive, 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 Employee Handbook. In particular, Globe considers any form of bullying, harassment (including sexual harassment), gender bias and racial or religious vilification as serious breaches of its policies.

Anti-bribery and corruption

Globe takes a zero tolerance approach to bribery and corruption. Globe’s anti-bribery and corruption policy is set out in the Employee Handbook and includes strict protocols prohibiting behaviours such as offering bribes to government officials and offering or receiving any financial or other inducement or reward for an action which is illegal, unethical, a breach of trust or improper in any other way.

Privacy

Globe’s Privacy Policy regulates the handling of any personal information that Globe collects. Globe’s Privacy Policy specifically requires 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 they operate. A copy of the Privacy Policy, as it relates to the information collected from our customers, potential customers, and any other persons we deal with, in accordance with the Privacy Act 1988 and its thirteen Australian Privacy Principles (APPs) is included on all Company websites.

Ethical sourcing

Globe is committed to ethical sourcing. Globe has an Ethical Sourcing Policy which broadly requires its suppliers to provide a minimum level of working conditions for all their employees, contractors, and sub-contractors, which includes being treated with dignity and respect, freedom from discrimination, reasonable working hours and to have a safe and healthy workplace. Globe takes the risk of Modern Slavery seriously and expects its suppliers specifically not to use child labour, prison, convict, slave, indentured, bonded, or other forced labour. In addition, suppliers must comply with all applicable environmental laws and regulations and are encouraged to follow sustainable practices, including the sourcing of sustainable raw materials for use in the manufacture and packaging of our products. Globe requires its suppliers and sourcing employees to agree with its Ethical Sourcing Policy, which is available in full detail [here](#) along with submitting an annual Modern Slavery Statement ([here](#)).

Other policies regulating employee behaviour

All Globe employees are required to comply with Globe's Employment and Corporate policies, as well as its Occupational, Health & Safety policies. Such policies are set-out in the Employee Handbook or other policy documents, and all employees are introduced to these policies as part of their induction. These policies include share trading rules, confidentiality of Globe's information, proper uses of Globe's IT resources and proper engagement with social media, among other things.

Reporting breaches of this Code of Conduct

Globe has in place an internal complaints policy that helps employees determine how to report any breaches of company policies, including this Code of Conduct. As part of this complaints policy, employees are referred to the Whistle Blower Policy, which is in place to encourage its directors, employers, contractors, and certain eligible external parties to report any breaches of this code of conduct without fear of disciplinary action, reprisal, or detriment. A copy of Globe's Whistle Blower Policy is available [here](#).

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 and updated on a regular basis by Globe's senior management.