

# Code of Conduct

## Experience Co Limited

ACN 167 320 470

**EXPERIENCE CO LIMITED**

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## Introduction from John O'Sullivan CEO

Welcome to Experience Co, the leading adventure tourism operator in Australia and New Zealand! Since our start in 1999 in Wollongong, Australia, our Company has immersed adventurers from all over the world with incredible experiences, building a reputation for safety, friendliness, and excellence.

Whether its freefalling over one of our amazing Drop Zones in Australia or New Zealand, Scuba diving the Great Barrier Reef, swinging through the treetops in Launceston, being on safari near Kakadu or trekking some of the most beautiful trails in the world – the success and growth of our Company depends on the knowledge, experience and talent of our employees, the strength of our management team, the quality of our business strategy and our compliance with the highest standards of corporate conduct, ethics and governance.

Our Code of Conduct has been prepared for the guidance and benefit of all stakeholders and sets out the values we hold, and the standard of behaviour expected of our employees.

It is important that you understand the non-negotiables when working at Experience Co. Firstly, at the forefront of all that we do and core to our values is the Safety of our employees, customers, and all stakeholders. Reporting hazards, incidents and issues relating to quality assurance is critical to our ongoing success and meeting our vision of being the most respected adventure tourism business.

Secondly, respect needs to be in your DNA to work at Experience Co. We all need to treat the workplace, each other and the environment just like you would like to be treated. We have zero-tolerance to bullying, harassment and discrimination at Experience Co and all claims will be investigated thoroughly. We all deserve to work in a place where we feel safe and respected, so help us, help you.

While this Code does not and cannot address every issue of conduct or ethics that may arise, in many cases its overriding principles should be a guide to Experience Co's values and expected standard of behaviour. Consider this Code as the first step in your career pathway at Experience Co and setting the context for future decision-making. You are encouraged to raise any questions with your experienced and respected colleagues or the General Manager People + Performance.

I am pleased to welcome you to the Experience Co team.

**John O'Sullivan**  
**Chief Executive Officer and Executive Director**

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## 1. OVERVIEW

### 1.1 Purpose of the Code

Experience Co (**also referred to as EXP/Company/Group**) is committed to conducting its business with the highest legal, professional, and ethical standards. All Employees and other persons acting on its behalf are expected to uphold this commitment.

The objective of the Code of Conduct is to:

- a) Provide a benchmark for professional behaviour;
- b) Support Experience Co's reputation within the community and environment in which we operate; and
- c) Identify the actions that should be taken where a breach occurs.

Employees must not act in any way that could bring negative attention or cause harm to Experience Co's reputation during their employment. Employees have a duty to act in a manner that merits the continued trust and confidence of the public.

### 1.2 Our values

Experience Co is an adventure tourism company offering high quality and memorable adventure tourism experiences to our customers. Experience Co's vision is to be Australia and New Zealand's most recognised and respected adventure tourism company and our purpose is to help people escape the ordinary.

Our values are:

We will deliver an extraordinary **experience** to our customers and Employees.

We **respect** one another, and the environment in which we operate.

We are bold and **adventurous** in what we do.

**Safety** is at the heart of all that we do.

This Code of Conduct (**also referred to as the Code**) provides the framework for how our vision and values are linked.

At Experience Co we display our values by committing to the following standards:

- a) Our customers are at the centre of everything we do, and we are committed to delivering extraordinary experiences to our customers and our Employees;
- b) We demonstrate integrity and professionalism in all our working environments;
- c) We are focussed on utilising our Employees high level of skills and judgement for the benefit of our customers and demonstrating that safety is at the heart of all that we do;
- d) Honest and ethical behaviour underpins everything we do;
- e) Fairness and transparency are displayed in all opportunities for learning, promotion, and growth for all of our Employees;
- f) We respect confidential information acquired in the course of the Company's business which is not in the public domain and do not divulge such confidential information to any person unless specifically authorised by the Chief Executive Officer (**CEO**) or as required by relevant legislation, including observing continuous disclosure obligations imposed by the Australian Securities Exchange (**ASX**) Listing Rules.

## 2. WHO THE CODE APPLIES TOO

This Code of Conduct applies to all directors, officers, executives, employees, consultants, contractors, associates and representatives of Experience Co (**collectively referred to as Employees for the purposes of this Code of Conduct**) in their dealings with each other and with customers, suppliers, regulators, shareholders, government bodies and all other stakeholders.

It is each Employee's responsibility to comply with this Code and each Employee must:

- a) Act with integrity, honesty, ethically, morally, fairly and be trustworthy in all business dealings and relationships;
- b) Avoid conflicts between personal interests and Company interests;
- c) Protect Experience Co's assets;
- d) Respect and abide by Company obligations to fellow Employees, shareholders, customers, suppliers, competitors, and the communities in which the Company operates;
- e) Comply with all laws and regulations that apply to Experience Co.

### Directors Responsibilities

A Director of Experience Co has an obligation to comply at all times with the spirit and the principles of this Code of Conduct as well as the law.

Each Director and the Board collectively is committed to upholding the values of good corporate citizenship and governance in both individual conduct and corporate actions. These responsibilities, and this commitment are highlighted by this Code. Directors have considered this Code of Conduct and are bound by it.

Directors must:

- a) Act in accordance with the law and in good faith in the best interests of the Company and for a proper purpose;
- b) Act in the interests of the shareholders as a whole and, wherever possible, avoid any actual or potential conflict of interest;
- c) Exercise reasonable care and diligence;
- d) Not make improper use of information; and
- e) Not make improper use of their position.

## 3. BREACHES OF THE CODE OF CONDUCT

### 3.1 Suspected Breaches of the Code of Conduct

All Employees of the Company must comply with the Company's policies and procedures that are in place from time to time. Failure to comply with the Company's policies may result in disciplinary action including dismissal or termination.

You are encouraged to report to your manager any genuine behaviour or situation which you consider breaches or potentially breaches the Code of Conduct, Company policies or the law.

If you know of, or have good reason to suspect any unlawful or unethical behaviour or situation or consider that you are a victim of unacceptable behaviour, immediately report the matter through any of the following channels:

- a) Your manager (this is usually the best place to start);
- b) The General Manager of your division;
- c) Your People + Performance Representative.

All issues can also be raised with Senior Management or with the General Manager People + Performance (who will assess the appropriate action in the circumstances). Experience Co promotes and encourages a positive reporting culture that is free of any disadvantage or discrimination against anyone for raising concerns or reporting issues and has adopted a Whistle-blower policy to protect you from any reprisal or victimisation for raising any concerns.

## 3.2 Investigations

Subject to confidentiality in accordance with Whistle-blower legislation, investigations of allegations of wrongdoing will be conducted in a manner that is confidential, fair, and objective. The investigation processes will vary depending on the nature of the alleged wrongdoing and the amount of information provided. All reports will be promptly evaluated and investigated.

Preliminary investigations of reported breaches will be administered by the General Manager People + Performance and where necessary, external resources may be engaged to assist with an investigation.

## 3.3 Breaching the Code

Depending on the nature of the breach, and subject to applicable employment laws, penalties may be imposed ranging from counselling to dismissal or termination of the contract or engagement (in extreme circumstances).

The Company reserves the right to inform the appropriate regulatory body or authorities where it is considered that there has been criminal activity or an apparent breach of the law. Experience Co will act objectively and in accordance with applicable legislation and any applicable provisions or requirements of an employment contract.

## 4. WHO TO SPEAK TO IF YOU HAVE QUESTIONS

Compliance with the Code of Conduct cannot be achieved without support and consultation. You are encouraged to reach out if you have any questions regarding the Code of Conduct or any of Experience Co's policies at any time. You should feel free to contact your manager and/or your People + Performance Representative.

## 5. COMPLIANCE WITH LAWS & REGULATIONS

You should be aware of, and comply with, your duties and obligations under all laws and regulations relating to the performance of your duties at Experience Co. We encourage you to be proactive with seeking ways to enhance your knowledge of the regulations and laws that apply to your role including maintaining relevant industry memberships and accreditations and participating in forums and educational publications.

## 6. OTHER COMPANY POLICIES

### 6.1 How the Code relates to other Company Policies

The Code of Conduct should be read in conjunction with all relevant Company policies, which include (but are not limited to) our policies that deal with privacy, health and safety and whistleblowing.

We are committed to keeping our guidelines current and regularly test our policies under this Code of Conduct so that our commitments remain relevant, effective, and consistent with our stakeholders' expectations.

### 6.2 Equal opportunity, anti-discrimination and diversity

The Company has adopted a Diversity policy and Bullying & Harassment policy that applies to all Employees and sets out the Company's commitment to (amongst other things):

- a) Equal employment opportunities;
- b) Compliance with fair employment practices and anti-discrimination laws;
- c) A workplace free from any kind of discrimination, bullying, harassment, or intimidation of Employees; and
- d) Diversity within the Group.

### 6.3 Equal Opportunity Employment

The Company expects that all Employees will treat one another with respect and dignity and specifically prohibits discrimination on the basis of age, colour, disability, ethnicity, marital or family status, nationality, race, religion, gender, sexual orientation, or any other characteristic protected by law. These principles extend to all employment decisions, including:

- a) Recruiting, hiring, and training; and
- b) Promotions, pay, and benefits.

Experience Co is committed to:

- a) Providing equal opportunity in the workplace, irrespective of a person's gender, marital status, religious belief, ethical belief, colour, race, ethnic or national origins, disability, age, political opinion, employment status, family status or sexual orientation.
- b) Identifying and eliminating any institutional barriers that cause or perpetuate inequality in respect of the employment of any person or group of persons;
- c) Ensuring all its policies and practices uphold the principle of equal employment opportunity;
- d) Ensuring all staff appointments are made solely on the basis of merit; and
- e) Ensuring all promotions, advancements, salary reviews and professional/career development opportunities are based solely on merit.

In addition to complying with Equal Employment Opportunities provisions, the Company is committed to compliance with all other applicable civil rights, human rights, environmental and labour laws. The responsibility and process of raising concerns or complaints is outlined in the Diversity policy.

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Experience Co is committed to mentoring and development throughout the Company and aims to provide clear outlines of role requirements and duties to ensure that all Employees are supported to fulfill their duties with integrity and respect toward customers, stakeholders and the community. Supervisors and Managers will not abuse their authority and will delegate duties to employees taking into account their competence and workload. Likewise, Experience Co expects employees to follow Supervisor and or Manager instructions and complete their duties with skill and in a timely manner.

## 6.4 Harassment-free Working environment

Experience Co is committed to promoting teamwork and excellence in the working environment that is free from discrimination, harassment, or other intimidating personal behaviours. Under health and safety legislation, the Company has a responsibility to do everything possible to eliminate or reduce risks to employee's health and safety.

This policy and the Bullying and Harassment policy expressly prohibits the following behaviours:

- a) Unwelcome conduct – whether verbal, physical, or visual – that is based on a person's protected status, such as race, colour, religion, gender, age, national origin, citizenship status, disability, sexual orientation, veteran status, or any other protected status;
- b) Bullying, intimidation, harassment, abusive language, physical aggression, discrimination, deliberately causing injury to another or any disorderly conduct or malicious disturbance. This includes intimidation or harassment of others;
- c) Sexual harassment. This includes unwelcome sexual advances, request for sexual favours, as well as other physical, verbal, or visual conduct based on sex when:
  - i Submission to the conduct is an explicit or implicit term or condition of employment; or
  - ii The conduct has the purpose or effect of unreasonably interfering with the individual's work performance or enjoyment of the employment or workplace by creating a hostile, offensive, or intimidating working environment.

Experience Co will promptly investigate all allegations of harassment, bullying, victimisation or discrimination and will take appropriate corrective action. We have a zero tolerance to sexual harassment under any circumstances and it is the obligation of every Employee to ensure that the working environment remains free from all harassment, including sexual harassment.

Adverse action against individuals for raising claims of harassment or discrimination will not be tolerated.

## 6.5 Substance free working environment

The Company is committed to promoting a safe, open, and honest workplace that protects our Employees and the best interest of the business and customers and is committed to a substance free workplace. The Company has adopted a Drug & Alcohol Management policy that applies to all Employees and, amongst other provisions, prohibits all Employees from working or conducting duties under the influence of drugs or alcohol.



In our commitment to providing a substance free workplace, Experience Co conducts random testing, pre-engagement testing, reasonable suspicion and post incident testing and prescribes training and support to always ensure compliance.

A breach of the Drug & Alcohol Management policy may result in the Company taking disciplinary action. This may include suspension (paid or unpaid), termination (with or without notice), removal from operational sites and/or commencing legal or disciplinary action or proceedings. There is no obligation on the Company to offer employment to a person who has returned a positive test result or breached this policy.

## 6.6 Whistle-blower policy

The Company has adopted a Whistle-blower policy that applies to all Employees and sets out the Company's policy regarding the reporting of, and dealing with, actual or potential breaches of this Code of Conduct or the law.

Experience Co's Whistle-blower policy encourages all persons to report any wrongdoing in good faith and in an environment free from victimisation so that the Board and Senior Management can address any improper conduct.

The Whistle-blower policy describes:

- a) The process for making any whistle-blower disclosures;
- b) The protections for whistle-blowers; and
- c) The process for investigating any whistle-blower disclosures.

## 6.7 Workplace health and safety

Aligned with our core values, Experience Co is committed to maintaining a healthy and safe working environment for its Employees at all times and encourages all Employees to ensure individual behaviours and practises reflect this commitment. Focus on training, systems and methods for the timely reporting of any health or safety hazards or incidents, faults, repairs, cleaning needs and accidents, is a priority.

While compliance with all applicable laws, regulations, and record-keeping requirements is mandatory, Experience Co is committed to exceeding the minimum legal standards and aims to avoid all injuries and to be recognised as an industry leader in safety.

Experience Co supports, promotes and is committed to conducting its operations in an environmentally responsible manner and to identifying and managing environmental risks that may arise out of its operations. All businesses and divisions of Experience Co are expected to conduct their operations in compliance with applicable environmental laws and regulations in the jurisdictions in which they operate. Employees are expected to fully comply with all appropriate laws and internal initiatives and regulations (including workplace health and safety laws).

## 7. PRESENTATION & DRESS

Employees are expected to exercise good judgment and common sense in how they present themselves when representing Experience Co.

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It is important that staff demonstrate respect towards their workplace, and courtesy towards others by exhibiting good hygiene practices and avoiding wearing clothing that is likely to be considered unprofessional, inappropriate, or offensive.

Management may exercise a degree of discretion when determining the standard of dress that will be adopted within each working location or subsidiary brand. In doing so, consideration will be given to stakeholder expectations, reputation, the comfort and preferences of Employees, climate, local custom, and the type of work performed.

EXP supports a workplace respectful of all religious, cultural or other beliefs and therefore clothing or garments worn to comply with religious, cultural or other requirements are acceptable as long as they do not pose a hazard or risk to health and safety. Employees uncertain about whether their attire is acceptable should consult their Manager or People + Performance Representative.

Considering the above, all Employees are required to observe the guidelines established for their role and working location and abide by the uniform guidelines provided when supplied with a uniform.

The following is generally considered inappropriate workplace attire:

- a) Soiled or torn clothing or shoes (whether deliberate or not);
- b) Sports attire such as gym gear;
- c) Tank tops or halter tops;
- d) Clothing that is too tight, too short, or too revealing;
- e) Apparel displaying offensive logos;
- f) Uncovered, open toe footwear.

Managers have the right to ask Employees to change into appropriate attire should this Code not be adhered to. Repeat incidents may be regarded as failure to comply with presentation standards and result in performance coaching or disciplinary action.

## 8. INTELLECTUAL PROPERTY

Experience Co owns all rights (including any intellectual property rights) in any works, ideas, concepts, designs, inventions, developments, improvements, systems or other material or information (Materials) created by Employees:

- a) In the course of employment;
- b) That relates directly or indirectly to employment;
- c) That assists in the performance of Employees duties;
- d) That was created as the result of using Company resources;
- e) That otherwise relates in any way to Experience Co's business and activities.

To the extent necessary to give effect to this provision, Employees assign to the Company all existing and future intellectual property rights in all works, inventions, designs, recordings, and subject matter, created or generated by Employees (whether alone or with the Company or other Employees, agents or contractors) for use by the Company and acknowledge that by virtue of this clause, all such existing rights are vested in the Company and, on their creation, all such future rights will vest in the Company. Use of Experience Co's intellectual property for personal purposes requires prior written approval of the CEO.

## 9. FINANCIAL INTEGRITY

Experience Co has stringent financial accounting procedures that are overseen by management, the Audit and Risk Committee and the external auditor.

Procedures are in place to ensure that the use of Company funds or assets for any unethical purpose, including for the advantage of others, or to cause loss to the Company is prohibited.

Payment on behalf of Experience Co may be made or approved on the understanding that it will or might be used for the stated purpose.

## 10. FRAUD

Fraud is dishonestly obtaining a benefit, or causing a loss, by deception or other means.

There is a mental or fault element to fraud and it requires more than carelessness, accident, or error, and can be committed by an internal or external party (or both by way of collusion). This policy requires all Employees of the Company to:

- a) Manage fraud control within Employee's areas of responsibility;
- b) Implement fraud risk management strategies and participate fully in activities relating to fraud control; and,
- c) Advise relevant Management, the CEO, the CFO, or the General Manager People + Performance, of any concern, suspicion, or information relating to fraudulent, corrupt, or improper conduct, and encourage others to do the same.

## 11. GIFTS & IMPROPER PAYMENTS

It is inadvisable to give a gift or favour, or to accept a gift or favour from anyone with whom the Company does business. Experience Co requires disclosure of any business gift, favour, or entertainment (other than reasonable business meals), given or received, that have a value more than \$250.

In some instances it may be difficult to identify improper payments or gifts. There are legitimate circumstances where a gift or benefit may be received or given. The general rule for any gift and benefit is that an Employee must not accept gifts, benefits or hospitality that will compromise, or appear to compromise the Company's integrity and a person's objectivity in performing their duties, or cause, or appear to cause a conflict of interest. Subject to the above disclosure, Employees may accept gifts, benefits, or hospitality if they are in keeping with the generally accepted local customs and practice of the industry or if their refusal would cause offence to the giver and provided that such conduct is legal and can be publicly defended.

Experience Co complies with the Australian anti-bribery legislation, and this prohibits 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 Employees. Acceptance of any bribe or improper payment or favour is prohibited. In addition to cash payments, bribes include kickbacks or kickback schemes, unexplained rebates or other disguised allowances or expenses.

## 12. CONFLICTS OF INTEREST AND THIRD PARTIES

Employees are expected to avoid placing themselves in a position where their private interests conflict directly or indirectly with their obligations to Experience Co.

You must ensure that you are not directly or indirectly involved in any other employment or business which may affect or compromise your ability to perform your duties or, in any activity in conflict with the business interests of Experience Co.

All business decisions and any related actions must be based on the needs of the Company – not on personal interests or relationships. It is essential that all Employees of the Company avoid even the appearance of conflicts of personal interest and those of the business.

For purposes of this policy, a conflict of interest is any interest that conflicts with the purpose, policies, or operations of your service with the Company. A conflict includes anything that a reasonable person might view as a potential conflict.

All Employees must immediately disclose (as soon as a person is aware of a conflict) any actual or perceived conflict of interest (direct or indirect) which could, in any way, compromise the reputation or performance of Experience Co. Any conflict of interest or potential conflict of interest should be reported to your manager or the General Manager People + Performance.

## 13. PRIVACY & SURVEILLANCE

Experience Co takes privacy and safeguarding of privacy seriously. All Employees must diligently respect and maintain the privacy of personal information held by the Company regarding its clients, customers, Employees, and all stakeholders. This extends to any information or opinion, whether true or not, and whether recorded in a readable form or not, about an individual whose identity is apparent, or can reasonably be ascertained, from that information or opinion.

The Company collects Employee personal information for the purposes of keeping records and includes, but is not limited to, your name, date of birth, gender, address, contact details, bank account details and other financial information. Personal information can also include sensitive health information which may be required by the Company from time to time. By accepting this policy you are consenting to the Company accessing, holding and using your personal information and providing it to third parties for the purposes of your Employment, operating the Company's business and any related purpose.

In respect to surveillance it is important to understand the following provisions:

- a) Any Company provided computer, phone or email (including internet) will be subject to continuous monitoring through the use of hardware and software;
- b) You may be subject to camera surveillance while you are on the Company's premises;
- c) Any images or other evidence obtained by surveillance devices may be used by the Company for purposes associated with its business including internal reporting, security, safety and marketing; and
- d) The Company may use, install and maintain surveillance devices that may capture images and sound of Employees in the course of your employment or engagement.

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It is recommended that Employees take the necessary steps to understand the privacy laws of Australia and New Zealand and Experience Co's privacy policies which detail the appropriate use of personal information.

Information on the Australian Privacy law is available from the Office of the Australian Information Commissioner at [www.oaic.gov.au](http://www.oaic.gov.au). Information on New Zealand Privacy law is available from the Office of the Privacy Commissioner at [www.privacy.org.nz](http://www.privacy.org.nz).

## 14. IMPROPER USE OR THEFT OF COMPANY PROPERTY

Protecting the Company's assets and information is critical to the interests of the Company.

Confidentiality obligations are normally specified in employment contracts and require that an Employee will not, either during or after employment or engagement with Experience Co, unless expressly authorised in writing by Experience Co's CEO, disclose to any person or make use of any information which is confidential to the Company and to which you had access in the course of employment or as a necessary part of the performance of your duties with the Company.

In the event of resignation or termination or at the request of the Company you must return all property, including any documents or confidential information. You may be directed to destroy or delete any confidential information stored in electronic, magnetic, or optical form so that it cannot be retrieved or reconstructed.

The use of Company property is for the sole purpose of conducting business-related activities unless prior consent is obtained.

You are responsible for protecting any Company property and assets under your control and must safeguard them from loss, damage, theft, and unauthorised use. Actions not consistent with Company expectation include:

- a) Use of Company assets for any unlawful purpose or unauthorised personal benefit;
- b) Misuse or frivolous use of Company assets;
- c) Removal of Company assets from premises without a proper reason and purpose. If required to be removed, they should be stored in a secure manner and covered by appropriate insurances; and
- d) Make improper disclosure, including inadvertent or careless disclosure, of competitive business strategies and plans, procedures and special methods of operation and other information that is of competitive value.

If unsure whether information is of a confidential nature, seek advice from your manager before disclosure.

## 15. SECURITIES TRADING

The Company has adopted a Securities Trading policy that aims to:

- a) Provide a brief and high-level summary of the law of insider trading;
- b) Set out the restrictions on trading in the Company's Securities by people who work for, or are associated with the Company; and

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- c) Assist in maintaining market confidence in the integrity of dealings in the Company's Securities.

All Employees are expected to familiarise themselves and act in accordance with the Securities Trading policy in conducting any dealings in the Company's securities. Any questions regarding its operation should be directed to the Company Secretary.

## 16. COMMUNICATIONS & APPLICATIONS

The Company owns and controls access to all communication equipment, including computers, software, e-mail, voicemail, texts, conferencing equipment, and office supplies. The Company reserves the right to monitor all communications, including internet, telephone, and mobile phone usage.

Experience Co has adopted an Information Technology policy providing guidelines on the use of information technology resources within the Company.

## 17. COMMUNICATIONS & PUBLIC DISCLOSURES

Experience Co Employees may not make any comments to the media or submit a story for publication in the media without the prior consent of the CEO .

Employees are responsible for the integrity of the information, reports, and records under your control, and you are expected to exercise the highest standard of care in preparing materials for public communications. The material created must:

- a) Comply with all applicable legal requirements;
- b) Fairly and accurately reflect the transactions or occurrences to which they relate;
- c) Not contain any false or intentionally misleading information, nor intentionally misclassify information.

Experience Co encourages the application of common sense, the observation of quality standards and the expectation of good taste regarding content and language when creating documents for the Company. Experience Co's electronic communications systems should not be used to access or post material that violates Company policies, or any laws or regulations, including but not limited to Twitter, Facebook, Instagram, LinkedIn, TikTok, etc. In addition, Employees using any social media online spaces must ensure they comply with and follow the Company's Social Media policy.

Media statements and official announcements may only be made by the CEO or the Chairman of the Board of the Company (**Chairman**) or by persons expressly authorised by the CEO or the Chairman to do so. If you receive a request for information and you are not authorised to respond to the enquiry, refer the request to the appropriate person.

The Company has adopted a Continuous Disclosure policy as a means of ensuring compliance with its continuous disclosure and communication obligations under the Corporations Act and the ASX Listing Rules. The aim of the Continuous Disclosure policy is to ensure the investor market is fully informed of information that may have a material effect on the price or value of the Company's securities, and where applicable, to correct any material mistake or misinformation in the market.

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The Company also has a Shareholder Communications policy which is designed to promote effective communications with the Company's Shareholders and other key stakeholders. Employees must not release any information publicly (including to the media or via any platform) that is required to be disclosed to the ASX, until the Company has received formal confirmation of its release to ASX.

Employees should familiarise themselves with and act in accordance with the above policies.

## 18. WORKING WITH CHILDREN

Experience Co is committed to ensuring that appropriate protections are in place when working with children. Where there is a reasonable expectation that Employees will work with children, the General Manager People + Performance must be consulted to determine whether a working with children reference check is required. Working with Children reference checks are a requirement in our Treetops Adventure and Reef Education programs.

## 19. REVIEW

The Board will review this Code of Conduct as often as required to ensure it remains relevant to the current needs of the Company.

This policy may be amended by resolution of the Board.

This policy will be available on the Company's website.

***Updated – February 2023***