

Purpose

JMH Group is committed to conducting itself with integrity, honesty, and fairness in all business practices and to observing the rule and spirit of the legal and regulatory environment in which the company operates.

The purpose of this Code of Conduct is to:

- Establish the standards of behaviour expected of the JMH Group Directors, Leadership Team, all workers, contractors, and consultants (referred to collectively hereafter as “Representatives”) of JMH Group when dealing with each other, shareholders, other stakeholders, and the broader community,
- Maintain confidence in JMH Group integrity and support the company’s statement of values, business reputation and corporate image within the community,
- Consider JMH Group legal obligations and the reasonable expectations of its stakeholders,
- Set out the responsibility and accountability of individuals for reporting and investigating reports of unethical practices, and
- Make Representatives aware of the consequences if they breach this Code of Conduct.

This Code aims to ensure that JMH Group delivers on its commitment to integrity, honesty, and fairness in its business practices, and to observing the rule and spirit of the legal and regulatory environment in which the company operates but it does not create any rights in any person including any employee, client, consultant, contractor, customer, supplier, competitor, or shareholder.

This Code applies in addition to, and not to the exclusion of, JMH Group other policies and procedures as amended from time to time.

Scope

All Representatives must comply with this Code. The Leadership Team will also make advisers, consultants, and contractors aware of JMH Group expectations as set out in this Code.

This Code applies to all business activities with suppliers, contractors, customers, shareholders, competitors, and employees in Australia and overseas.

Responsibility lies with each person covered by this Code to conduct themselves in accordance with this Code. If you have any questions, you should speak to your Supervisor or a Company Director.

Commitment to the Code

Without limiting the ensuing section below, Representatives are committed to conducting themselves with integrity, honesty, and fairness in all business practices and to observing the rule and spirit of the legal and regulatory environment in which JMH Group operates in accordance with this Code, and must deal with JMH Group suppliers, contractors, customers, shareholders, and competitors accordingly.

Responsibility of JMH Group Representatives

All Representatives of JMH Group are responsible for complying with this Code in detail and in spirit.

Everyone must:

- Act in accordance with JMH Group values and the best interests of the company,
- Act with integrity – being honest, ethical, fair, and trustworthy in all business dealings and relationships,
- Comply with all laws and regulations that apply to JMH Group and its operations and avoid any illegal or unethical activity,
- Act ethically and responsibly,
- Avoid conflicts between JMH Group interests and personal interests,
- Treat fellow staff members with respect and not engage in bullying, harassment, discrimination, or other forms of detrimental conduct,
- Deal with customers and suppliers fairly,
- Protect the JMH Group business reputation and assets,
- Not take advantage of the property or information of JMH Group or its customers for personal gain or to cause detriment to JMH Group or its customers.
- Not take advantage of their position or the opportunities arising therefrom for personal gain, and
- Report breaches of this Code to an appropriate person at JMH Group as set out in section “Compliance with the Code of Conduct”.

Additional responsibilities are set out in further detail below.

Compliance with laws

JMH Group is to comply with all legal and common law requirements which affect its business wherever it operates. Any transgression or reasonably suspected breach of the applicable laws and/or regulations is to be reported to the Directors as soon as you become aware of such an instance. You should be aware of, and comply with, your duties and obligations under the laws and regulations relating to your work. You are encouraged to:

- Understand the laws which affect or relate to your involvement in JMH Group operations, and
- Have an understanding of the Integrated Management System (IMS) and how your job relates to this.

If you have a question as to whether a particular law or regulation applies or how they may be interpreted, please contact your Supervisor or a Company Director.

Conflicts of Interest

A conflict of interest exists where loyalties are divided. You may have a conflict of interest if, in the course of your employment or engagement with JMH Group:

- Any of your decisions lead to an improper gain or benefit to you or someone associated with you, or
- Your personal interests, the interests of someone associated with you, or obligation to some other person or entity, conflicts with your obligation to JMH Group.

Representatives must not involve themselves in situations where there is a real or apparent conflict of interest between them and the interests of JMH Group. Where a real or apparent conflict of interest arises, the matter should be brought to the attention of JMH Group Directors so that it may be considered and addressed appropriately.

Outside Memberships, Directorships, Employment and Public Office

JMH Group supports involvement of its Representatives in community activities and professional organisations. However, outside employment or activity must not conflict with a Representative's ability to properly perform their work for JMH Group, nor create a conflict (or the appearance of a conflict) of interest.

Before accepting outside employment or a position on the board of directors of another company or non-profit organisation, you must carefully consider whether the position could cause, or appear to cause, a conflict of interest. If there is any question, consult your Supervisor or a Company Director.

You must obtain prior written consent from your Supervisor or a Company Director where any proposed involvement with an outside organisation may conflict with the interests of JMH Group.

You may accept public office or serve on a public body in your individual private capacity, but not as a representative of JMH Group. If such public office would require time away from work, you must comply with JMH Group procedures regarding the requesting and granting of leave.

Protection of Assets

Representatives must protect JMH Group material assets to ensure these remain available for legitimate business purposes, and to ensure business opportunities can be secured by JMH Group.

Protection of Confidential Information

Confidential Information is information that JMH Group considers to be confidential and that is not generally available outside JMH Group and may include information of third parties to which JMH Group has access. It includes information that JMH Group owns, develops, pays to have developed or to which it has an exclusive right.

JMH Group and all Representatives must ensure that they do not disclose any Confidential Information to any third party or other Representative who does not have a valid business reason for receiving that information unless:

- Permitted or required under relevant laws or regulations, or
- Agreed by the person or organisation whose information it is.

If Confidential Information is required to be provided to third parties or other Representatives for valid business purposes, JMH Group and its Representatives must:

- Take adequate precautions to seek to ensure that the information is only used for those purposes for which it is provided and is not misused or disseminated unlawfully. Such precautions may include obtaining a confidentiality agreement or other undertaking before sharing information.

(advice about these measures can be obtained from your Supervisor or a Company Director), and

- Take steps to ensure that the information is returned or destroyed when the purpose is complete.

Environmental and Sustainability

JMH Group's success in environmental management is underpinned by its belief that business can and must be conducted in an environmentally sustainable manner.

Each Representative of JMH Group has a duty of care to ensure they work in a manner which complies with JMH Group environmental policies and procedures, and they act in a manner that reflects this Code of Conduct and our Statement of Values.

Representatives must:

- Report all incidents and take remedial action in the event of an environmental non-compliance,
- Manage our operations in line with statutory and licence obligations and community expectations, and
- Seek to efficiently use energy, water, and other natural resources, while also minimising waste and emissions.

Financial Reporting Ethics

JMH Group and its Representatives are committed to providing full, fair, accurate, timely and understandable information in JMH Group business reports and other communications in accordance with applicable laws, accounting standards and relevant rules and regulations.

Records and other documents should be maintained, held, and stored in a proper manner and in such a way as to maintain security, confidentiality, and availability to properly authorised Representatives. JMH Group prohibits any Representative from altering or destroying company records except as authorised by the Integrated Management System (IMS).

The Consolidated Financial Statements of JMH Group are prepared in accordance with Australian Accounting Standards. JMH Group seeks to maintain a high standard of accuracy and completeness in its financial records.

JMH Group is committed to accurately record and properly document all accounting entries in accordance with applicable laws and regulations. JMH Group internal control over financial reporting should assure that transactions are properly authorised, executed, recorded, processed, summarised, and reported. Representatives shall report any significant deficiencies or material weaknesses or any concerns regarding questionable accounting or auditing matters.

Financial records shall be available for inspection by management and auditors.

JMH Group should strive to resolve and remediate any internal control weaknesses identified by Representatives, external audit, or other external party.

Manipulation of the corporate records, including posting fictitious entries, deliberately manipulating estimates, adjusting entries, and posting any other incorrect business transactions is strictly forbidden.

Health and Safety

JMH Group is committed to ensuring the health and safety of its employees, consultants, contractors and visitors to its workplace and any other persons who JMH Group works with, as required by law.

Mentoring

JMH Group encourage all experienced and skilled workers to mentor those workers who are less experienced and skilled. In some circumstances formal mentoring arrangements are implemented.

Workforce Complaint Resolution Procedure

Where workplace issues occur, which result in a grievance, JMH Group Procedure documents provide a means of addressing and resolving them.

Wherever possible, grievances should be resolved through cooperation in the immediate work area using an informal process. Where there is no successful resolution, or where the issues are particularly complex or sensitive, it may be appropriate to proceed with a formal process.

Personal Appearance

All employees must comply with JMH Group standards relating to the wearing of JMH Group uniforms and personal grooming.

Public Comment and Participating Online

Public comment refers to comments made on political or social issues at public speaking engagements, on radio, letters to the press, online forums, social gatherings, or in other circumstances where it is reasonably foreseeable that the comment will flow to the community, including social media channels.

Representatives are reminded that if they make a public comment in a private capacity, such comment should not represent, or foreseeably be taken to represent, JMH Group.

Responsibility to the Community

JMH Group will recognise, consider, and respect community concerns which arise in relation to JMH Group activities and comply with community standards and all applicable legal and regulatory requirements.

Representatives when interacting with local communities are to:

- Demonstrate respect and courtesy towards each other and members of the local communities,
- Not practice abusive, offensive, hostile, or aggressive behaviour or use language that may cause offence,
- Cause no damage to community-owned or private facilities that they are privileged to use as an employee or a contractor to JMH Group.
- Generally, avoid any behaviour that could harm JMH Group's reputation or relationship with its local communities.

Obligations Relative to Fair Trading and Dealing

JMH Group will deal with others in a way that is fair and will not engage in deceptive practices.

When dealing with others, you must perform your duties in a professional manner, act with integrity and objectivity, and always strive to enhance JMH Group's reputation.

Gifts and Hospitality

From time to time, you may be offered gifts or hospitality in connection with your employment at JMH Group. You must not give any gift, seek any gift, or accept any gift which goes beyond common courtesies associated with general commercial practice.

You must wherever possible declare any gift prior to receipt. If it is impractical or impossible to do so, you must disclose the gift to your Supervisor or a Company Director as soon as practicable after its receipt.

You must refuse or return (as the case may be) any gift if reasonably directed to do so by your Supervisor or a Company Director.

Financial and Other Inducements

Australia has specific legislation prohibiting any person or company from offering a bribe to a government official or for an official to receive a bribe.

JMH Group must maintain an accurate and auditable record of all financial transactions in accordance with generally accepted accounting principles. This includes maintaining appropriate records of all gifts, entertainment and payment to government officials, employees, and others. Entries should not distort or disguise the true nature of any transaction.

Representatives must not offer, promise, give, demand, or accept any undue advantage, whether directly or indirectly, to or from:

- A public official
- A political candidate, party, or party official
- A community leader or other person in a position of public trust
- Any private sector employee

to obtain or retain direct business or to secure any other improper advantage in the conduct of business.

This section of the Code of Conduct also applies to agents and third parties who are engaged by JMH Group to represent its interests.

JMH Group Directors will review this Code of Conduct at least annually, and update it as required.

JMH Group Continuous Improvement Register will be used to record identified improvements and monitor the progress of their implementation. When relevant, this information will be fed into service planning and delivery processes.

Procedure Compliance

Any breach of compliance with this Code of Conduct is to be reported directly to JMH Group Directors.

Workers who breach this Code of Conduct may be subject to disciplinary action and may be required to enter into a Performance Improvement Plan with JMH Group before being permitted to resume work.

Nothing in this Code of Conduct prevents JMH Group from applying Summary Dismissal in circumstances involving Serious Misconduct.