

# CODE OF CONDUCT

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Spotless Group Holdings Limited

23 July 2015



We'll take care of it.



# 1. Introduction

Spotless Group Holdings Limited (“the Company”) is committed to achieving the highest standards of ethical behaviour through all members of the organisation working collaboratively, and conducting business in accordance with company standards, applicable laws and regulations.

The success of the Company relies on the confidence that clients and the community have in the way we conduct our business. Integrity, confidentiality and the highest ethical standards are our key principles. We recognise that while all our actions must be lawful, mere lawfulness may not be an adequate test of integrity. The highest standards of professionalism must at all times guide the actions of all involved with the Company; from staff and contractors through to our Executive Management and Board of Directors.

This Code of Conduct (“the Code”) is provided to assist employees, contractors and others who represent the Company (“You”) in understanding their responsibilities to uphold the standards and values to which the Company aspires.

The obligations in the Code are binding on all employees and are in addition to any obligation in any specific Spotless policy, an employee’s contract of employment or site / contract specific obligations that may apply to an employee at any time.

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## 3. Code of Conduct overview and objectives

### 3.1 Overview

This Code of Conduct (“the Code”) outlines how Spotless Group Holdings Ltd (“the Company”) requires each person who represents the Company to behave and conduct business.

The Code applies to all employees in all companies in the corporate structure of Spotless Group Holdings Limited.

### 3.2 Objectives

The objective of the Code is to:

- provide a benchmark for professional behaviour;
- support the Company's business reputation and corporate image within the community; and
- identify the actions that must be taken where a breach occurs.

### 3.3 Who does the Code apply to?

The Code applies to all persons (“You”) who represent the Company, including but not limited to:

- permanent and full-time and part-time employees;
- fixed term and maximum term full-time and part-time employees;
- casual employees;
- contractors engaged by the Company; and
- the Board of Directors.

### 3.4 Code administration

Corporate Human Resources is responsible for making sure the Code is regularly monitored and reviewed. They will work closely with the Company's Executive Management and the Board of Directors to update the Code as needed.

Executive, Senior and Line Managers must take all reasonable steps to ensure that employees have access to and understand the Code as well as Company policies and procedures.

Managers will be accountable for compliance with the Code in their areas of operational responsibility and provide awareness training consistent with the Code which is tailored to the particular jurisdiction of their operation.

## 3.5 Underlying principles

### Compliance with the law

Some laws affect everyone, such as those concerning equal employment opportunity, the environment, privacy and criminal laws and workplace health and safety. Other laws primarily affect employees in particular roles, such as those concerning product liability and trade practices.

You must ensure you take steps to fully understand and comply with all laws and regulations relevant to your work. Ignorance of the law does not excuse Spotless or its employees from their obligation to comply.

Should you require further information or have a question regarding specific laws and regulations that apply to your duties or how those laws and regulations may be interpreted and applied, please contact your line manager or a member of the legal and compliance team.

### Spotless Core Values

The Code is underpinned by the Spotless Core Values. Our Core Values describe the approach we take to our work and our relationships with each other, our customers, business partners and other stakeholders.

#### Core Values... ...which is all about

- |                           |  |
|---------------------------|--|
| Rolling up our sleeves    | <ul style="list-style-type: none"> <li>• Being hands on, jumping in and doing whatever it takes to get the job done properly for our customers but also for one another.</li> <li>• Our attitude is one of 'can do' not 'might do'.</li> <li>• We work hard, always.</li> </ul>  |
| Putting people first      | <ul style="list-style-type: none"> <li>• Respecting, supporting and inspiring those we work with (and for) day in, day out.</li> <li>• Our culture is one that's built on teamwork, encouragement, investing in people and helping each other to always be our best, and enjoy our jobs.</li> <li>• We're ethical, trustworthy and reliable.</li> </ul>              |
| Leading not following     | <ul style="list-style-type: none"> <li>• Moving with the times, setting the pace and always leading by example.</li> <li>• Our proud story is one of constant evolution, rising to challenges and aspiring to be the benchmark.</li> <li>• We are highly capable experts with extensive experience.</li> </ul>   |
| Finding better ways       | <ul style="list-style-type: none"> <li>• Bringing fresh ideas to the table, embracing curiosity and thinking creatively to change the game at any and every opportunity.</li> <li>• Our passion for innovation means that we're always looking to improve what we do and asking ourselves how we can make a difference.</li> </ul>                                   |
| Making every dollar count | <ul style="list-style-type: none"> <li>• Treating Spotless and client assets as if they are your own.</li> <li>• We are accountable and we take great responsibility for both Spotless and client expenditure.</li> <li>• Providing an optimum return on investment to our shareholders is always top of mind and shapes how financial decisions are made</li> </ul> |



## 4. Use of information systems, assets and resources

### 4.1 Information systems

Employees are expected to use information systems such as computer systems (including data stored on those systems), voice mail, telephones, instant messaging, facsimiles, internet, intranet and email, for business purposes only.

You must never:

- use the Company's information systems to bully or harass co-workers including accessing, transmitting or storing offensive material;
- use the Company's information systems to break the law or violate company policy;
- use social networking sites to comment adversely about the Company, its staff, clients or other person connected with our business;
- be frivolous or negligent in protecting information communicated or stored on Company information systems or in safeguarding hardware, software and data against damage, loss, theft, alteration and unauthorised access.

The Company information systems are organisational resources and as such employee use is monitored.

(Refer [IS and Related Systems Use Policy](#), [Information Security Policy](#) and [Social Media Policy](#))

### 4.2 Other assets and resources

Company assets are critical to business competitiveness and success. These assets may include office equipment, supplies, intellectual property, confidential information, brands, cash and company financial facilities.

You must ensure that Company assets and resources are used only for authorised and legitimate business purposes and make best endeavours to ensure any Company property and assets that are under your control are safeguarded from loss, theft and unauthorised use.

An accurate and auditable record of all transactions relating to the use of Company assets and resources must be maintained in accordance with accepted accounting and business principles. Non-financial records (e.g. personnel files, customer information, environmental documentation, safety statistics, etc.) must also be rigorously and securely maintained.

Unauthorised removal, sale, transfer or loan of Company assets (including cash, stock and equipment) or other resources shall be regarded as theft.

The obligations under this Code shall equally apply to the use of client assets.

### 4.3 Copyrighted materials & trademarks

Many materials used in the course of work at the Company are protected by copyright laws: computer software, audio and video tapes, trade journals, books and magazines are some examples of these materials.

Presentation slides, training materials, management models, or other materials prepared by outside consultants or organisations will also be protected by copyright. You should not reproduce, distribute or alter materials owned by others without valid permission of the copyright owner or its authorised agent. As it is not always easy to determine if such permission exists already, permission must be obtained before using these materials.

Company trademarks, business names, domain names, service marks, logos and slogans, (“proprietary marks”) which are used in the course of business, are also valuable assets which must be protected. You must always use these proprietary marks properly and only for legitimate business purposes. The use of proprietary marks must always be cleared in advance with Spotless Legal and Spotless Marketing. Advice on protecting Spotless’ interest in such marks can also be provided from Spotless Legal.



## 5. Use of information

### 5.1 Confidential information

In the course of your duties, you may receive or have access to confidential information about the Company or its customers or suppliers. Confidential information is information that the Company considers private and that is not common knowledge outside the Company.

Examples of confidential information include, but are not limited to:

- company documents, books, accounts, processes or other 'know how';
- trade secrets;
- intellectual property;
- price lists/cost sheets;
- tender information including costings, margin analysis, scope analysis and related materials;
- lists of customers;
- employee (personal) details;
- details of marketing programs;
- technical and systems information (including algorithms);
- information about suppliers;
- computer systems;
- business strategies and plans;
- special methods of operation; or
- other information that is of competitive value to the Company.

Because the disclosure or misuse of such information could seriously damage the Company or individual employee interests, safeguarding this information from loss, theft and unauthorised use is the responsibility of all Spotless employees.

Except where disclosure is appropriately authorised, you must not use or give out confidential information either through deliberate or inadvertent or careless disclosure. This includes not giving confidential information to other business units in the Company or using the information provided for a different purpose.

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

The obligation to maintain confidential information is a condition of employment/engagement and continues even after an individual leaves the Company.

### 5.2 Privacy obligations

For the purpose of its business operations, the Company collects and holds information obtained from various people and groups including, but not limited to, shareholders, customers, suppliers, employees, employee candidates and public authorities.

Privacy is of utmost importance given the sensitive information held by the Company. Individuals must respect and maintain the privacy of personal information held by the Company. This extends to any information or opinion, whether true or not, and whether recorded in a human readable form or not, about an individual whose identity is apparent, or can reasonably be ascertained, from that information or opinion.

You may be required to collect personal information or may come into contact with this information. You must only collect information and/or disclose this information if it is reasonable, practical and legal to do so.

Company policies and procedures exist to ensure that all personal information is handled in accordance with the requirements under privacy legislation, relevant to the countries in which we operate. You are required to observe the requirements of these policies and may not use or disclose the personal information of others to a third party unless permitted by law to do so.

(Refer [Privacy Policy](#))

## 5.3 Public release of company information

You must not make public comments which may be construed as representing the official views of the Company. Except as expressly authorised by the Board or the Chief Executive Officer, the making of public representations on behalf of Spotless shall be limited to the Chairman of the Board and the Chief Executive Officer.

Employees who are invited to make public speeches on topics related to the Company or are asked by the media for comment, shall refer the request to Spotless Marketing.

(Refer [External and Internal Communications Policy](#))



## 6. Ethical business conduct

### 6.1 Fraud, theft & corruption

The Company adopts a 'zero tolerance' to fraud, theft and corruption and any such acts will not be tolerated in any form. As such, all incidents where such misconduct is identified will be referred to the relevant external agency for consideration of further investigation/prosecution.

Some examples of fraud, theft and corruption are:

- theft of cash, plant, consumables or equipment by employees;
- false or misleading timesheets (i.e. dishonestly claiming payment for time not worked)
- false or misleading expense claims (i.e. dishonestly claiming a business expense);
- false invoicing (i.e. dishonestly provide invoices for goods or services not supplied in accordance with the description in the invoice);
- false accounting (i.e. dishonestly allowing the reporting of incorrect or misleading financial results);
- using position within Spotless to achieve a personal gain (or that of another, or entity), that are contrary to the best interests of Spotless.

(Refer [Fraud, Theft & Corruption Policy](#))

### 6.2 Conflicts of interest

Each individual must avoid placing themselves in a position where their private interests may conflict directly or indirectly with their obligations to the Company.

A conflict of interest or a perceived conflict of interest can arise where there is a personal, family or associated commercial interest which may interfere, or appear to interfere with the interests of the Company, its suppliers and customers due to the real or perceived influence on the individual in the effective and objective performance of their duties and responsibilities because of divided loyalties.

Examples of a conflict of interest or a perceived conflict of interest include:

- being involved in or having a significant ownership or personal financial interest in other enterprises where a conflict may arise with individual's obligations to the Company;
- participating in activities or discussions where there may be a conflict with their duties and responsibilities to the Company;
- soliciting or receiving benefits such as cash, gifts or entertainment in connection with, or as a reward for, any service or business of the Company, where the benefits, because of the frequency of the offers, the cost and circumstances and timing in which they are offered, creates, or could be interpreted as creating, an obligation that affects the individual's objectivity in making a business decision;
- taking advantage of property, information or other opportunities arising from your position in the Company;
- conflicts of interest arising from a family, business or personal relationship; or
- conflicts arising from activities outside employment (such as involvement in community activities and professional organisations);
- use subcontractors of the Company for private purposes where the employee is involved in the subcontractor review or the accreditation process, or is able to influence the allocation of work to those subcontractors.

In these circumstances, you must take action to remove or manage the conflict or perceived conflict so as to avoid detriment to the Company, employees or customers. Any conflict of interest or potential conflict of interest must be reported to the individual's manager, and in the case of Directors or the Chief Executive Officer, to the Board.

You should note that specific disclosure or approval requirements might arise in regard to conflict of interest situations under Company policy, the Corporations legislation or local regulations.

(Refer [Conflict of Interest & Working with Family Policy](#))

## 6.3 Trade practices

The Company is committed to a pro-competitive culture. Compliance with the trade practice, consumer and competition and anti-trust laws of all countries in which it operates is part of this commitment. Compliance with these laws also promotes ethical standards and a commitment to free and fair competition.

Trade practice laws apply to everyone in the workplace and must be adhered to. Where the impact of the law is uncertain, you must seek appropriate legal advice and act on an informed basis.

No employee may contravene trade practices or anti-trust laws or to authorise or condone contravention by others. Contravention cannot be justified by claims of ignorance, good intentions or failure to seek legal advice, and will be regarded as a serious breach of your responsibilities and duties.

When acting on behalf of the company and engaging with customers, suppliers, shareholders, government officials, employees or the community at-large, you must conduct yourself in a professional manner, acting with honesty and objectivity at all times.

Spotless will conduct ongoing employee education and compliance programs to help ensure the success of this policy, and will promote a co-operative relationship with the relevant regulatory agencies in countries where it operates.

## 6.4 Financial inducements to influence outcomes (bribes)

The Company is committed to carrying out business fairly, honestly and openly and has zero tolerance towards all forms of bribery.

You may at times come under pressure to make payments or payments in kind (“bribes”) to induce others to act in favour of the Company even to the point of the act being illegal or dishonest.

The offering of bribes to individuals or entities to win business or to influence a business decision in the Company’s favour is prohibited. Making or requesting such payments could compromise all concerned and may expose the Company, yourself and others to criminal prosecution and serious penalties.

## 6.5 Receipt of gifts and entertainment

You must exercise the utmost care with respect to the receipt of business related gifts or entertainment from people or organisations who conduct business with the Company. This may include the provision of goods or services, personal favours, gratuities, or other gains.

The acceptance of gifts up to the value as stated in the *Gifts and Entertainment Register Operating Guidelines* is acceptable in situations where it is in accordance with normal business practice (i.e. where the exchange of gifts is customary and the gifts are appropriate for the occasion), however, all gifts with a value of AU\$100 or more must be disclosed to your manager and recorded in the Gifts Register. Your obligation to disclose includes singular gifts with a value of \$100 or more or multiple gifts provided over a 12 month period which have a combined value of \$100 or more.

You may only accept or provide entertainment (e.g. lunches, dinners, sporting events, arts and theatre) for customers and business associates where the nature and value of the entertainment is reasonable in light of nature and value of the business relationship with the Company and the seniority of the people partaking in the entertainment. All accepted entertainment with a value of AU\$100 or more must be disclosed to your manager and recorded in the Gifts Register. Your obligation to disclose includes one-off entertainment events with a value of \$100 or more or multiple occasions of entertainment over a 12 month period which have combined value of \$100 or more.

Where the receipt of a gift or entertainment could create an obligation or expectation that could conflict or be perceived to conflict with your work at the Company, or, the value exceeds the value as stated in the *Gifts and Entertainment Register Operating Guidelines*, it must be refused.

(Refer [Gifts and Entertainment Register Operating Guidelines](#))

## 6.6 Outside directorships

Employees (other than Non-Executive Directors) shall obtain the approval of the Chief Executive Officer prior to accepting a directorship in another business corporation, statutory authority or similar body.

Approval consideration will normally relate to whether the intended directorship will interfere with the ability of the employee to fulfil their role with the Company and whether any conflict of interest arises.

The involvement of Non-Executive Directors in directorships of other organisations shall be addressed in accordance with the Board Charter and Corporate Governance Guidelines.

Directorships of entities established for the management of employee and family assets are excluded from this policy provided there is no perceived conflict of interest.

## 6.7 Insider trading

The Australian Corporations Act 2001 (Cth) (Corporations Act) prohibits the trading in shares, options, debentures (including convertible notes) and other securities (securities) of a company by any person who is in possession of undisclosed price sensitive information regarding that company. The Corporations Act imposes substantial penalties on person who breach those provisions.

The Company maintains a Share Trading Policy, the purpose of which is to ensure that you:

- are aware of, and abide by, the legal restrictions on trading securities while in possession of Inside Information;
- adhere to high ethical and legal standards in relation to their personal investments in Company securities; and
- do not have personal investments that conflict with the interests of Company and other shareholders in relation to Company securities.

The Company requires you to read and understand the principles and requirements outlined within this policy and take personal responsibility for ensuring you remain compliant with the policy at all times.

(Refer [Share Trading Policy](#))

## 6.8 Relationships with government

The Company's ability to conduct business is affected by government decision making and government entities may potentially be major clients of the Company.

The Company maintains an impartial position when it engages with all levels of Government.

The Company understands that you may wish to participate in your country's political process in your capacity as a private citizen. When doing so, the Company asks you to be mindful that you behave in a manner that ensures your actions and opinions are characterised as your own and not representative of the Company.

Under no circumstance may you offer government or other officials' gifts or gratuity in exchange for favourable treatment, regardless of whether that treatment seeks to treat you as an individual, or the Company, favourably.

Should you have questions or queries in relation to interacting with government officials, please see your manager or contact Spotless Marketing.

## 6.9 Community engagement and corporate citizenship

The Company seeks to actively support the community of which it is a part. You must align your personal behaviour accordingly in this regard, and act in a manner which is respectful of the broader community and compliant with all relevant laws and regulations.

You are encouraged to support and contribute to the local community and provide suggestions to management on how the Company can continue to improve its contribution to the community and its standing as a good corporate citizen.



## 7. A safe and sustainable workplace

### 7.1 Workplace health & safety (WH&S)

The Company is committed to providing you with a healthy, safe and clean working environment. We have a positive safety culture with an objective of zero harm in the workplace. You must conduct yourself at all times in such a manner which ensures the workplace is safe and without risk to your health, or the health of all other persons present at our workplace, including employees, visitors, contractors, business partners, residents and customers.

Our five core safety beliefs are:

- all injuries can be prevented;
- everyone is responsible for injury prevention;
- working safely is a condition of employment;
- no site induction, no start;
- if it isn't safe, don't do it.

The Chief Executive Officer is the Company's Chief Safety Officer and management at all levels are required to contribute to the health and safety of all persons in the workplace. Internal WH&S committees are established in many of our workplaces. These committees are responsible for regularly reviewing WH&S in the workplace and for managing issues if and when they arise.

To ensure adequate focus is given to WH&S, the Company has a WH&S policy and supplementary guidelines and safe working procedures. You must read and understand the requirements outlined within these policies and procedures and take personal responsibility for ensuring you follow these instructions at all times. It is your personal responsibility to:

- Protect the health and safety of yourself and others while at work;
- Perform your assigned duties in accordance with accepted safe working practices;
- Provide Spotless management any information which will contribute to the protection of the health and safety of all people in the workplace;
- Follow and comply with all safety requirements of the Spotless Safety Management System whilst performing your work; and
- Report all safety hazards and incidents in accordance with Spotless reporting processes.

(Refer [Occupational Health and Safety Policy](#))

### 7.2 Alcohol, drugs & tobacco

The Company recognises that circumstances vary among different cultures and countries regarding the use of alcohol, drugs and tobacco.

However, despite these differences, you are responsible to ensure you are not impaired by illegal or legal drugs (including alcohol) while at work or when conducting Company business. Misusing controlled substances or alcohol or selling, manufacturing, distributing, possessing, using or being under the influence of illegal drugs on the job will not be tolerated.

The smoking of tobacco is not permitted on Company premises and workplaces other than in approved designated areas.

## 7.3 Sustainability and the environment

The Company maintains a strong commitment to ensuring its business activities do not negatively impact the natural environment and continually assesses its environmental impact in this regard.

The Company takes a broad and long-term view of sustainability through informed and balanced decision making processes, considering environmental, social and governance aspects.

The Company aims to achieve a high standard of environmental performance by complying with current legislation and through continuous improvement through the application of environment management systems.

You and the people you work with all have a responsibility to protect the environment during the conduct of their work. If you are aware or suspect that certain business practices or actions of the Company are not being implemented in an environmentally responsible manner, please report your concerns to your line manager or via the Whistleblower hotline.

(Refer [Sustainability Policy](#))

## 7.4 Equal employment opportunity

The Company recognises that people are a distinguishing feature of a successful and sustainable business, and is committed to building and maintaining an appropriately skilled and motivated workforce.

The Company treats employees as individuals, deserving the respect of their subordinates, peers and superiors, so as to be able to reach their full potential. The recruitment, advancement and remuneration for each employee shall be determined on merit - without discrimination or bias.

The Company will aim to positively promote and make available employment opportunities to people who face barriers to employment entry or who are typically disadvantaged in the workplace. To this end, the Company has in place workplace programs to support entry into employment and will also from time to time enter into contractual commitments with its customers which aim to positively promote diversity in employment.

(Refer [Workforce Diversity Policy](#))

## Workplace free of unacceptable behaviour

The Company fosters a workplace environment where employees are free of harassment, bullying, discrimination, victimisation and other forms of unacceptable behaviour.

You are required to comply with the Spotless Professional Behaviour Policy as varied from time to time, and workplace health and safety obligations under applicable legislation in each State / Territory in which the Company operates in.

You have the right and, are encouraged, to question and to escalate any genuine circumstance where you believe you have observed or been subjected to unacceptable behavior. Your complaint will be taken seriously by management.

Employees who bring to notice instances of unacceptable behaviour must not be victimised for doing so.

(Refer [Professional Behaviour Policy and Procedures](#))



## 8. Breaches of the Code

### 8.1 What happens if I breach the Code?

You must report the matter immediately.

The Company understands that breaches of the Code could occur by accident over the course of your employment or engagement with the Company. Regardless of whether the breach was wilful or not, you should be aware that breaches of this Code, including where you authorise or permit any breaches by a subordinate employee or contractor, may result in disciplinary action, and or termination of your employment/engagement with the Company.

During its investigation of a potential breach of the Code, the Company reserves the right to contact relevant external authorities, should the breach be of a nature requiring such action. Serious breaches of the Code may also result in the Company taking civil action and/or referring the issue to a law enforcement agency.

(Refer [Performance Management Policy](#))

### 8.2 Reporting channels

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

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

- your immediate supervisor or manager (this is usually the best place to start);
- higher management (i.e. your managers manager) up to and including the relevant Sector General Manager;
- or contact the Whistleblower Helpline on: 1800 010 024 (Australia), 0800 944 785 (New Zealand) or email: [whistleblower@spotless.com.au](mailto:whistleblower@spotless.com.au).

The appropriate person to investigate and the course of action taken to investigate and resolve a concern will depend on the nature of the issue and its severity. Some situations, such as those involving significant legal or financial issues, may require advice and input from professional advisers.

### 8.3 Whistleblower protection

Where you make a report under the Code, your calls, notes, emails and other communications will be dealt with confidentially and your privacy will be protected, unless you agree otherwise or the Company is legally compelled to disclose any such information.

Spotless is committed to protecting any employee who in good faith raises concerns or assists someone to make a report related to the violation of this Code.

It is a breach of the Code for any employee to cause disadvantage to or discriminate against an employee who makes a genuine report under the Code ('whistleblower'). Examples of disadvantage and discrimination include:

- reprisals, harassment or victimisation;
- demotion or dismissal or loss of opportunity for promotion; and
- current or future bias.

(Refer [Whistleblower Protection Policy](#))



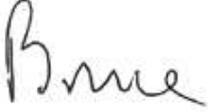
## 9. For more information

### 9.1 Spotless policies & procedures

This Code should be read in conjunction with all relevant Company policies, which include (but are not limited to) the policies referenced in the Code.

A full list of the Company's policies and procedures is available in the ["Policies" section on Fitz](#), the Spotless intranet site.

We regularly monitor and test our policies under the Code so that our commitments remain relevant, effective and consistent with our stakeholders' expectations. As policies and procedures may change from time to time, employees are responsible for making themselves familiar with any updates.

Chief Executive Officer sign-off:   <hr/>	Developed by:	Human Resources
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	Review date:	July 2016
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