



Global Company Code of Conduct (PC1.1)



Document Information

Document Control

Revision	Date	Author	Description of Change
	June 2012		Commencement

Document Review/Approval

Person	Role	Date	Action
		August 2020	Review
Vanessa Walker	Chief People & Culture Officer	May 2022	Review
Sylvia Broos	People & Culture Business Partner	August 2024	Review, update IR contact & Policy Owner
Sylvia Broos	People & Culture Business Partner	February 2025	Review
Leanne Ralph	Company Secretary	October 2025	Updated policy for new office address
Delaney Danca	Global People & Culture Manager	November 2025	Review
Delaney Danca	Global People & Culture Manager	June 2026	Review

Retention Policy

Period	Timeframe
Minimum Retention Period	12 months
Minimum Periodic Review Cycle	1 year
Ad Hoc Revisions Allowed?	No



Policy Statement

This policy applies to all employees of, and contractors to Integrated Research (IR) regardless of location, i.e. company office, a client site or any other location associated with the individual's employment.

References in this policy to the Company or IR refer to Integrated Research Ltd and all its subsidiaries.

From time to time IR may exercise its prerogative to change this policy in its absolute discretion or to introduce new policies in line with legislation and/or best practice. This policy does not impose any contractual obligations on IR or form any part of an employee's contract of employment or the terms and conditions of an employee's employment.

This policy will be published and available across IR on the Policies and Procedures section of SharePoint; a copy may also be requested from the People & Culture or Legal department.

Purpose

IR expects all employees to conduct all the activities they undertake on behalf of IR and with their fellow employees in compliance with this Code and with all legal, statutory, and regulatory requirements.

The IR Board and management will monitor compliance with the Code of Conduct and is committed to fulfilling IR's responsibilities as part of its core values to pursue the expectations of all stakeholders, including its employees, clients, shareholders, regulators, and the community; and to achieving IR's goals, objectives, and aspirations.

Policy

Each employee is required to behave at all times with honesty and integrity. Such behaviour is morally and legally right, and IR depends, for its business success, on its reputation for integrity and on the trust and confidence of everyone with whom IR deals.

Each employee is required to treat fellow employees, clients, suppliers, and all others with due respect and without regard to gender, race, colour, creed, age, marital status, physical attributes or limitations, or sexual preferences and to observe the laws against discrimination and harassment. Each employee is required to abide by IR's policies and procedures, instructions, and lawful directions that relate to their employment and duties.

All IR employees must scrupulously comply with all laws and government regulations applicable in their country, state, and other governing jurisdiction, including, but not limited to:

- Trade practices;
- Fair dealing;
- Consumer protection;
- Privacy;
- Employment/industrial relations law;
- Health and safety;
- Workplace Harassment
- Equal employment opportunity;
- Superannuation/pensions;
- Drugs and alcohol; and



- The environment.

For any interpretation or clarifications of legal or regulatory requirements employees should consult with their manager or People & Culture Representative.

Employees are expected to:

- serve IR faithfully, endeavor to promote its interests at all times, and ensure they do not act in any way during and outside work hours which may bring IR into disrepute or damage its brand or reputation;
- devote all of their time and attention to the business of IR during working hours and at such other times as may be reasonably necessary;
- comply with health and safety requirements;
- treat all employees, contractors, and clients with courtesy and respect and be honest in all dealings;
- not engage in harassment, bullying, discrimination, or victimisation towards other employees, contractors, or clients;
- not engage in conduct that could cause a conflict of interest between IR and its clients or third parties and disclose any conflict of interest to their manager;
- ensure they are aware of and comply with all IR policies;
- never report to work under the influence of drugs or alcohol;
- respect company property and equipment and ensure it is used and maintained in accordance with IR's requirements;
- maintain confidentiality of IR's confidential information both during and after the termination of employment or engagement; and
- not misappropriate company funds or property or the funds or property of clients, including intellectual property rights.

In addition to complying with the above, managers also have the responsibility to execute their managerial and supervisory duties with fairness. They should also ensure that they:

- do not condone, permit, or fail to report any breaches of this Code by employees under their supervision;
- maintain confidentiality when conducting investigations into employee grievances or complaints;
- avoid bias in decision-making and remove themselves from decision-making where they are unable to remain objective;
- support a diverse, inclusive, and welcoming culture;
- never pressure an employee to resign or cease their engagement with IR;
- exercise objectivity when administering rewards or discipline;
- do not represent someone else's idea as their own;
- do not perpetrate, permit, or fail to report violations of any federal, state, or local government law or regulation;
- never falsify or be a party to falsification of any IR or client documents; and
- not offer, promise, authorise, provide, or receive bribes.

Deal Honestly with Clients and Suppliers

Contract Negotiations – In negotiating contracts, employees must be accurate and complete in all representations. The submission to a client or supplier of a proposal, quotation, or other document or statement that is false, incomplete, or misleading can result in civil and/or criminal liability for IR and the involved employees who condone such a practice.

Product Quality – IR is committed to developing and delivering quality products which meet all contractual obligations and company quality standards.



Competitive Analysis – In conducting market analysis, employees must not accept or use the proprietary information of IR's competitors. Managers must ensure that competitor proprietary information is not obtained or used in any fashion.

Products – When in contact with clients, employees must not give any verbal or written undertakings or imply in any way the possibility of unannounced products or product developments without the written approval of the Chief Executive Officer or Chief Product Officer.

Commented [WW1]: I think this authority should be expanded to include CPO

Internal Communications

All Employees must exercise diligence and good faith in the preparation and communication of internal information or reports, ensuring that such information is accurate, timely, and presents a true and fair view of the facts.

Use of Company Resources

Employees are not to contribute or donate company funds, products, services, or other resources for any political cause, party, or candidate without the advance written approval of the Board.

IR's success in the marketplace results from providing superior products and services at competitive prices. IR does not seek to gain improper advantage by offering business courtesies such as entertainment, meals, transportation, or lodging. Employees must not provide any client or supplier with gifts or promotional items of more than a nominal value. An employee may pay for reasonable refreshments and/or entertainment expenses for clients and suppliers that are incurred only occasionally.

Employees must not promise, offer, or make any payments in money, products, or services to any foreign official in exchange for, or in order to induce favourable business treatment.

All company payments and other transactions must be properly authorised by management and be accurately and completely recorded on IR's books and records in accordance with generally accepted accounting principles and established corporate accounting policies. Do not make false, incomplete, or misleading entries. No undisclosed or unrecorded corporate funds shall be established for any purpose, nor should any company funds be placed in any personal or non-corporate account. Unacceptable practices, such as exaggerating business entertainment expenses, are prohibited.

Do not Abuse your Position of Trust

IR expects all employees to devote their full working time and efforts to IR's interests and to avoid any activity that may distract from or conflict with the IR's interests. In particular:

Conflict of Interest – An employee may not have any employment, consulting, or other business relationship with a competitor, client, or supplier of IR (except for moderate holding of publicly traded securities) unless they have the advance written permission of the Chief Executive Officer. Outside employment may also constitute a conflict of interest if it places an employee in the position of appearing to represent IR, involves providing goods or services substantially similar to those of IR, or lessens the efficiency, alertness, or productivity normally expected of employees and their jobs.

Insider Trading – All employees must abide by IR's Trading Policy. An employee must not trade in the securities of IR or any other company, or buy or sell any property or assets, on the basis of non-public information they have acquired through their employment at IR, whether such information comes from IR or from another company with which IR has a confidential relationship.

Acceptance of business courtesies – Employees must never accept anything of value from someone doing business with IR, whether this is offered in exchange for any type of favourable treatment or advantage, or otherwise. To avoid even the appearance of impropriety, IR does not accept any gifts or promotional items of more than a nominal value. Employees may accept meals, drinks, or entertainment, only if such courtesies are



unsolicited, infrequently provided, and reasonable in amount. Such courtesies must also be directly connected with business discussions. Employees must not accept free, or reimbursement for, lodging or travel expenses.

Dealing with the Media

Employees are not authorised to release information regarding IR to representatives of the media. Should any employee be approached by the press for information about or related to IR, then such requests must be forwarded to the Chief Executive Officer.

The Company Secretary is the person nominated by the Board as having sole responsibility for all communication with the Australian Securities Exchange.

Personal Use of Company Property

Employees may not use, direct, or appropriate company property, equipment, services, or assets for personal use or benefit. The improper and unauthorised use of any of these will be treated as theft.

Confidential Company Information

Confidential company information is considered company property and may be used or disclosed only with proper authorisation and only in the exercise of an employee's duties. All such information should be handled securely and with due care. Confidential company information may include but is not limited to: non-public business plans or strategy, technical product information, financial results or forecasts, competitive intelligence, client information, and personal information of clients or IR employees.

Employees must only use artificial intelligence tools that have been approved by IR and must not input, upload, disclose, or otherwise process confidential, proprietary, personal, or commercially sensitive information in any AI tool unless expressly authorized and permitted under applicable IR policies and controls. More information can be found in the [Artificial Intelligence Tool Usage Policy](#).

Commented [DD2]: Added call out to AI tools and confidential information

Disputes or Grievances

In circumstances where a dispute or grievance arises between the employee and IR, IR will address the issue promptly and discretely. This may include (as required) seeking responses from other parties involved, investigating the matter further, and speaking to any witnesses, including holding investigatory meetings with those involved.

The actual process to be followed in such instances is likely to vary depending on the circumstances surrounding the complaint. IR will follow the [Global Complaints & Grievance Procedure](#) where applicable.

Report Violations and Discipline

Managers are responsible for ensuring that employees adhere to the provisions of this policy. If an employee requires clarification or guidance on any point or needs to report any suspected violation of the policy, they should consult their direct manager or a member of the Executive Leadership Team.

No adverse action or retribution of any kind will be taken against any employee because they report a suspected violation of this policy or other irregularities. Such reports shall be treated confidentially to the maximum extent consistent with fair and rigorous enforcement of this policy.

Violations of the policy may result in disciplinary action ranging from warnings and reprimand to termination of employment or engagement - or even the filing of a criminal or civil complaint. Employees will be informed of the charges against them and will be given the opportunity to explain their actions before any disciplinary action is imposed. Subject to local legal requirements, an employee who has committed or been involved in unacceptable conduct will not be immune from disciplinary action merely because they have reported the unacceptable conduct in accordance with this policy.



In addition, if an employee witnesses illegal conduct, IR's [Global Whistleblower Policy](#) should be referred to in such circumstances. It could also be warranted to refer to the Global Whistleblower Policy for certain breaches of this Code.

For clarification, the purpose of the Global Whistleblower Policy is to detect and address unacceptable conduct, provide employees with a supportive working environment in which they feel able to raise issues of legitimate concern to them and IR, provide an avenue where employees can confidentially report unacceptable conduct, and protect people who report unacceptable conduct in good faith.

Complaint Handling

Complaints related to the Company's Code of Conduct are unique and each investigation will be handled differently. However, the following procedure should be followed by all employees should a complaint or disclosure about an alleged breach of the Code be considered appropriate action.

A complaint or disclosure should be in writing (preferably, although a verbal complaint or disclosure will be accepted) and contain details about the date, time, and nature of the alleged breach and include any available supporting material.

The allegation should be made to the employee's direct manager, or if the employee believes the direct manager may be implicated, to their People & Culture Representative or to the Chief Executive Officer.

If the complainant wishes to remain anonymous through the process, this should either be documented in the complaint or disclosure document (stating the request for anonymity through the process of an investigation), or they can raise an anonymous complaint by writing to the Company Secretary via email (at leanne.ralph@bellev.com.au) or at the following address:

Confidential – To be opened by the addressee only.

Company Secretary
Integrated Research Limited
Suite 9.03, Level 9
420 George Street
Sydney NSW 2000
Australia

The person to whom the allegation is made should undertake a prompt and thorough investigation, with the assistance of their People & Culture Representative, where applicable, and determine whether any action is required. Anonymity will be maintained through any investigation, to the extent possible, if the complainant requests such confidentiality.

The employee who lodged the allegation will be informed of the outcome of the investigation when possible; however, details may be withheld depending on the circumstances and outcomes of the investigation.

If unsatisfied with the outcome of the investigation, the employee may refer the matter to their People & Culture Representative, Chief Executive Officer, or the Company Secretary.

IR's Global Complaints and Grievance Procedure can provide further guidance regarding the appropriate steps for handling a complaint under this Policy.



Policy Review

This Policy document will be reviewed and updated in alignment with the Corporate Document Management Policy, or if there are any significant changes that impact this policy. This policy will be reissued company-wide should any substantive change be required.