Code of Conduct

September 2025

Powering Skills Organisation Ltd

Policy # PSO-015	**Version:** 2.0	**Policy owner:** CEO
Effective date: September 2025	**Next review date:** September 2027	**Authorised by:** Board of Directors

1. Purpose

The Code of Conduct provides a clear statement of the values and professional standards that Powering Skills Organisation Ltd (PSO) expects all Board Directors and employees, at all levels of responsibility, to follow in the performance of their work.

Individuals are always accountable for their actions. It is the responsibility of Board Directors and employees to be informed about the requirements of the Code, to participate in mandatory training and to ask questions if clarification is required. No one, no matter how senior in the organisation, is entitled to violate the Code or to give instructions to do so.

2. Scope

This policy applies to all Board Directors, employees, members and subcontractors of Powering Skills Organisation Limited (PSO). This policy should be read in conjunction and to support compliance with PSO's organisational policies.

Activities that are covered by this policy extend to conduct outside of the workplace, including engagement with stakeholders, conduct at work functions and conduct on social media platforms.

3. Alignment to AICD NFP Principles

PSO uses the Australian Institute of Company Director's framework of 8 not-for-profit governance principles to guide our governance framework.

This policy aligns with AICD NFP Principle 8 – Organisational Culture.

4. Values

Our values underpin the identity of, and all actions conducted by, PSO. All PSO employees are expected to behave in ways that are aligned with our purpose and values. PSO's values are:

- Safety and belonging drive everything we do
- We excel in collaboration and connection
- We act with integrity and responsibility
- We hold ourselves accountable and earn trust
- We make evidence-based decisions

- We are dedicated to making an impact.

5. Policy

We are committed to building and maintaining a positive, safe, diverse and inclusive working environment. We have expectations about the way we deal with one another, and certain types of behaviour are not acceptable at PSO. The company takes inappropriate conduct seriously, and everyone is required to be familiar with our workplace expectations, including as set forth in this Code.

All employees of PSO are expected to comply with relevant laws and work towards achieving a work environment that is:

- safe and free from health risks
- free from discrimination
- free from bullying
- free from sexual harassment
- free from aggression and violence
- free from offensive language.

Inclusion and diversity

PSO is committed to creating a safe, respectful, and inclusive workplace where diversity is recognised as a strength. We value the backgrounds, perspectives, and experiences of our people and strive to create a culture where everyone feels included, respected and able to fully contribute.

Our approach is people-centred. We support individual wellbeing and success by promoting inclusion at every level of the organisation. We actively encourage participation, provide equitable access to opportunities, and celebrate culturally significant events. By creating an inclusive environment and valuing diversity, we are better positioned to attract and retain top talent, build a connected workforce, and deliver on our organisational goals.

Discrimination, harassment and bullying

PSO does not tolerate any form of unlawful discrimination, harassment, bullying or victimisation.

Complaints will be treated seriously, confidentially, and in line with our Grievance Procedure. Further information can be found in the PSO Prevention of Workplace Bullying Policy and PSO Prevention of Workplace Discrimination, Sexual Harassment and EEO Policy.

Work, health & safety

We are committed to maintaining a healthy and safe work environment in all offices. Dangerous, abusive or violent behaviour, or the threat of such behaviour, is prohibited and will not be tolerated.

Employees have responsibility for protecting their own safety and the safety of others in their work activities. Employees must report breaches of safety in writing to the Leadership team.

Conflicts of interest

Board Directors and employees must avoid conflicts of interest.

A conflict of interest exists when it appears likely that an employee could be influenced, or where it could be perceived that they are influenced, by a personal interest in carrying out their duty.

Conflicts of interest may be real, apparent or potential.

While avoiding conflicts is generally preferable, in practice there may be some situations in which conflicts of interest cannot be wholly avoided and need to be managed in a way which will withstand external scrutiny. The action taken to manage a real or apparent conflict of interest will be determined according to the specific circumstances of the individual case, including the role and responsibilities that the individual performs at PSO.

Further information, including how to report and manage a conflict of interest, can be found in the PSO Conflict of Interest Policy.

Fraud and anti-corruption

PSO adopts a zero-tolerance approach to fraud and corruption.

Board Directors and employees must never offer or promise any personal or improper financial or other advantage in order to obtain or retain a business or other advantage from a third party. Nor may any Board Director or employee accept any such advantage in return for any preferential treatment of a third party. Such advantage could include hospitality or gifts. Further details on how to manage Gifts and Hospitality can be found in the PSO Conflicts of Interest Policy.

Dishonest activity causing actual or potential loss to PSO, including theft of money, data, intellectual property or time will not be accepted. Any incidents will be documented and investigated. Further information can be found in the PSO Fraud and Anti-Corruption Policy.

PSO encourages early reporting of any suspected fraudulent or corrupt behaviour. Whistleblowers will be protected under the *Corporations Act 2001*, in line with the PSO Protected Disclosure Policy.

Confidential information and privacy

Board Directors and employees must protect confidential information acquired in the course of their duties and must not use it for personal gain or disclose it without proper authority. All personal information must be handled in accordance with the *Privacy Act 1988* and the PSO Privacy Policy.

Use of technology

Board Directors and Employees must use PSO's assets and information systems, including communications platforms, responsibly and in accordance with the PSO IT Usage Policy. Personal use must not interfere with work duties or bring PSO into disrepute.

6. Roles and Responsibilities

Position	Responsibility
Board of Directors	Set expectations and oversee organisational culture, policy owner
CEO	Lead by example, enforce compliance and report breaches.
Leadership Team	Communicate and enforce the Code of Conduct, manage breaches, escalate concerns.
Employees	Comply with the Code of Conduct, raise concerns, participate in training.

7. Compliance

All Board Directors and employees must comply with this Code. Breaches will be investigated in line with PSO's disciplinary procedures and individuals will be given an opportunity to respond. Failure to comply with the Code may result in disciplinary action, including the possibility of dismissal and, if warranted, legal proceedings or criminal sanctions.

PSO will provide regular training (during induction and as an annual refresher) to employees on the requirements and expectations of the Code of Conduct.

Related documents

- JSC Code of Conduct
- PSO Policies (see Employment Hero)

Document control table

Version	Description	Date
V.0.1	New policy	April 2024

Version	Description	Date
V.0.2	Board adoption	April 2024
V.0.3	Updates from governance review by Apex Compliance Solutions	December 2024
V.0.4	Board adoption	February 2025
V.1.0	Published	March 2025
V.2.0	Policy revision	August 2025
V.2.0	Board adoption	September 2025
V.2.0	Published	September 2025