

Vocus Sustainability Principles

October 2020

Vocus is a company that is committed to doing things differently – from its approach to Team to creating choice and competition in the telecommunications market. Underlying this is a belief in transparency, accountability, honesty and conducting business with integrity for the benefit of our shareholders, team members and customers.

1. Ethics, integrity and governance

The Vocus Code of Conduct aims to develop a consistent understanding of, and approach to, the desired standards of conduct and behaviour of the directors, officers, team members and contractors of Vocus in carrying out their roles for the Company.

Team members must respect the law and act accordingly by observing and respecting the relevant laws, customs and business methods in the environment in which we operate.

Team members should consistently maintain their integrity whilst carrying out their duties by avoiding all situations in which their personal interests conflict or might appear to conflict with their duties to the Company.

The Vocus Whistleblower Policy helps team members detect, address and prevent reportable or inappropriate conduct within Vocus. Vocus encourages all officers, employees and contractors to act in good faith and report any conduct which is, or may be, harmful to Vocus or any of its employees, officers or contractors, and includes:

- a) Dishonest, fraudulent or corrupt practices;
- b) harassment, discrimination, victimisation or bullying;
- c) criminal conduct, including theft, unlawful drug use, violence or intimidation, criminal damage to property;
- d) breaches of state or federal law or other rules or regulations which apply to Vocus (e.g. ASX Listing Rules);
- e) unethical conduct, or breaches of Vocus's policies or procedures, including the Vocus Code of Conduct;
- f) unsafe work practices or work practices in violation of environmental regulations;
- g) conduct likely to cause financial or other loss or reputational damage;
- h) serious improper conduct or an abuse of authority; or
- i) conduct aimed to conceal records related to the above.

2. Environment

The Company strives to operate in a manner which minimises waste and prevents pollution.

Accordingly, at a minimum:

- the Company's operations are to comply with relevant statutory and regulatory requirements;
- the Company will regularly monitor its environmental performance, objectives and targets and enquire that support functions exist to effectively maintain and continually improve environmental standards;
- the Company must ensure that environmental care is of equal importance to every facet of the Company's management and operations;
- the Company is committed to returning sites to a state compatible with a healthy environment; and

- the Company will continue to promote individual commitment to safe and environmentally responsible behaviour through the training and education of, and dissemination of information to, all relevant team members.

3. Community

Our approach to community is to get involved, give back and make a difference in our significant areas of operation. The Vocus business and our team members support a number of charities.

4. Suppliers

Our suppliers include a range of national to multinational organisations, across different regions and different businesses. Where possible, we source supplies locally for each location and hold local account management relationships, although this is balanced against ensuring we are able to obtain those supplies as economically as possible (as part of our commitment to delivering returns to shareholders). We also preferentially purchase environmentally conscious supplies, including recycled paper, in all our offices.

We appointed a procurement manager in FY15 to manage the procurement practices of the Company. This includes conducting regular reviews of suppliers to ensure that we are securing appropriate commercial terms for all our purchasers, and monitoring the performance of our suppliers to ensure that they continue to meet the standards and guidelines of our corporate policies.

5. Team

Vocus is committed to providing a safe and healthy workplace, and to developing, maintaining and promoting safe and productive work practices in all aspects of its business.

The Company will not permit discrimination, intimidation or harassment of, or by, team members on the basis of race, gender, marital status, national origin or religious beliefs, or on the basis of any other personal characteristics protected by law.

The Company recognises the importance of valuing the many differences in background, culture and demographic characteristics of our team members.

6. Policies

Vocus' governance policies including its Code of Conduct, Whistleblower Policy, Risk Management Policy and Corporate Governance Statement are available at <http://www.vocus.com.au/corporategovernance>