



# Code of Conduct

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# Purpose and Scope

## Purpose

Coolon PTY LTD is wholeheartedly committed to fostering a working environment of respect, integrity and full compliance with all necessary laws, regulations and policies. This Code of Conduct document serves as a set of rules and guidelines to ensure a fair, lawful and honest operation at all times.

We are dedicated to not only manufacture the highest quality, most robust and reliable luminaires but also to conduct our business based on trust, integrity and sincerity.

Quality. Experience. Dedication.

***That's the Coolon difference.***

## Scope

The Code of Conduct applies to all Coolon employees, representatives, agents and business partners, regardless of the level of seniority or the degree of involvement. Coolon also uses its best effort to only cooperate with third party entities who share the same principles and values as those stated in the Coolon Code of Conduct.



# Respect in the Workplace

Coolon is committed to building a culture of trust, professionalism, respect and equality. We are passionate about promoting teamwork and building a healthy, safe and peaceful work atmosphere for all team members. Coolon has zero tolerance for any form of bullying, harassment, sexual harassment, or discrimination. We are committed to providing a workplace free from behaviours that violate a person's dignity, including verbal, physical or psychological harm.

We are resolute in fostering a collaborative environment where employees are encouraged to partake in respectful discourse, feel more confident and share ideas and perspectives openly. Our company's strength is based on bringing in people with different backgrounds and perspectives. As Coolon embraces, promotes and cultivates workplace diversity, we are dedicated to recruit, train, promote and treat applicants and employees without discrimination.

## 1.1 Human Rights

We are dedicated to ensuring that each and every worker associated with Coolon is treated fairly and with dignity and respect. We are committed to upholding the internationally recognized human rights of all people, and we expect the same ethics from all our partners.

## 1.2 Equal Employment Opportunity

Everyone deserves to be considered for any available position at Coolon based on their experience and skill. All Coolon employees are to be treated equally in all aspects of their jobs, regardless of the seniority or field of employment.

## 1.3 Non-Discrimination

Coolon guarantees that human rights are exercised without discrimination of any kind based on race, colour, gender, language, religion, political or other opinion, national or social origin, disability or other. Just and fair treatment for all.

## 1.4 Fair Compensation and Working Hours

Coolon ensures fair compensation and reasonable working hours for all employees. The schedule and work hours will not exceed the maximum set by law.



## Integrity in the Business

Coolon acknowledges its obligation to always act in good faith in the Company's best interests. We will not at all offer or accept any business courtesies that constitute or could reasonably be perceived as establishing unfair business inducements that would violate laws and regulations or would cause embarrassment or reflect negatively on Coolon's reputation. We take a zero-tolerance stance on corruption, bribery, extortion, money laundering, fraud, embezzlement and any form of misappropriation of company assets and resources. We will unceasingly maintain our corporate reputation and retain the confidence of everyone with whom we do business.

### 2.1 Legal Compliance

We are diligent to abide by every law, regulation and legislation present in a country of operation. We continuously observe all applicable laws to ensure and maintain a lawful operation.

### 2.2 No Improper Advantage

Coolon does not tolerate corruption in any form, which includes but is not limited to bribery, kickbacks, gifts or any other mal-intended and unlawful payments. Coolon employees will not accept or offer any gifts that might influence a business-related decision.

### 2.3 Tax Compliance

Coolon complies with all applicable tax laws and regulations by paying tax timely and accurately. We closely monitor any change or update to ongoing tax laws and adjust our practice accordingly.

### 2.4 Responsible Sourcing

Responsible sourcing is a fundamental principle of Coolon's business operations. We are committed to sourcing goods and services in an ethical, sustainable, and socially responsible manner. Although Coolon is not required to report under the Modern Slavery Act 2018 (Cth), we support its objectives and take proactive steps to mitigate the risk of modern slavery within our operations and supply chains. All suppliers are expected to operate in alignment with the Coolon Supplier Code of Conduct and uphold standards consistent with these values.



## Commitment to Stakeholders

### 3.1 Intellectual Property

We will vigorously defend and protect Coolon’s intellectual property such as our patents, designs, trademarks, trade secrets, and copyrights and also respect the rights of others. We will consistently safeguard the Company’s confidential or proprietary information as well as every information that our third-party partners entrusted to Coolon.

### 3.2 Disclosure of Information

Coolon is committed to maintaining the accuracy, integrity, and transparency of its business records. All company books and documentation—including financial statements, contracts, and operational records—are maintained truthfully, completely, and in compliance with applicable legal and regulatory requirements in the jurisdictions in which we operate. We ensure appropriate access to such records while safeguarding confidentiality and commercial sensitivity.

We manage personal and sensitive information in accordance with applicable data protection laws and regulations, including but not limited to the Privacy Act 1988 (Cth) and the Australian Privacy Principles, where relevant. Coolon also adheres to internationally recognised standards for the secure collection, handling, storage, and disposal of data. We implement robust controls to prevent unauthorised access, protect individual privacy, and ensure data is handled with the highest level of care and responsibility across all systems and regions.

### 3.3 Responsibility for Products and Services

At Coolon, we are committed to creating the highest quality, most reliable and best-performing products. We strive to offer our customers exceptional value through every step of the process, from comprehensive engineering to vigorous testing, to detailed manuals and safety instructions. Should we become aware of any problem with our product or service, we will immediately alert all involved parties, launch a comprehensive investigation of the problem and implement a long-term solution to prevent the issue from reoccurring ever again.

### 3.4 Speaking Up

We believe that everyone plays a part in maintaining honesty, integrity and lawfulness of company operations. If a Coolon employee becomes concerned or aware of a violation of Coolon Code of Conduct, they must promptly raise a concern with their manager or HR department.

### 3.5 Non-retaliation Policy

The corporate environment, where employees feel comfortable and safe voicing their concerns is immensely important to us. Coolon does not allow any form of retaliation against anyone raising concerns or conducting investigations.



## Equality in the Marketplace

Coolon treats our third-party vendor, consultant, contractor, service provider or supplier of raw materials, competitors, customers, as well as the society we serve, with equality, conscience and integrity. We strive to uphold high ethical standards when dealing with everyone in the marketplace and treat them fairly, ethically and by meeting all requirements of all applicable laws. We are devoted in handling competition in the business fiercely, without any partiality and in compliance with applicable antitrust, competition and trade practices regulations. Coolon demands an immediate and full disclosure in the event of any situation that might be or might appear to be a conflict with Coolon's interest.

### 4.1 Personal Conflict of Interest

We are diligent to avoid any personal conflict of interest, where a Coolon employee chooses personal gain over the duties to an organization in which they are a stakeholder or exploits their position for personal gain in some way. Coolon employees should report any potential conflict of interest to their immediate manager or HR department.

### 4.2 Fair Competition

Coolon is committed in building a culture of professionalism, respect and equality. We are passionate in promoting teamwork, increasing productivity, efficiency, knowledge.

### 4.3 Trade Controls

Coolon maintains an effective export/import control compliance program in accordance with all applicable Trade Control Laws in every country of operation.

### 4.4 Fair Procurement

All suppliers, contractors and third-party organisation are selected based on their value proposition, quality, lead times and other objective standards. Decision-making regarding procurement must be unbiased and without preferential treatment based on personal relations.