

1.1 Code of Conduct

The Code of Conduct provides the blueprint for Megaport's culture. We expect everyone (Directors, Senior Executives and all employees) to observe and abide by the behavioural standards set out below, in all internal and external dealings.

As individuals and as a company, we:

- » Understand and comply with the letter and spirit of this Code, the laws that apply to our day to day operations, and the policies contained in Megaport's Employee Handbook.
- » Will always strive to act in the best interests of Megaport. If we are unsure of any expectation of us, we will seek clarification from our Manager or the People and Culture department.
- » Must act with the utmost integrity and objectivity, striving at all times to enhance the reputation and performance of the Megaport group companies.
- » Avoid engaging in illegal, corrupt, fraudulent, dishonest or unsafe behaviour, or breaches of this Code or other policies and will report such behaviour if we see it.
- » Treat each other with respect, no matter our position, and always strive to interact in a manner which acknowledges, considers and includes the wide diversity of backgrounds, personalities and capabilities each of us bring.
- » Deal with customers and suppliers fairly.
- » Create and maintain an environment free of unlawful discrimination, harassment, victimisation and bullying, and take action to stop such behaviour if we become aware of it.
- » Feel safe and supported to suggest new ideas, encourage creativity, raise concerns and to voice our professional opinions to anyone and everyone around us.
- » Recognise the efforts and achievements of those that go above and beyond in their duties and demonstrate commitment to the vision and goals of Megaport.
- » Remain open to and adaptable to change and see innovation as being critical to our growth and evolution.
- » Always act ethically, responsibly and work with due care and diligence to identify and manage any risks to best ensure the protection of Megaport and its assets and resources, our employees, contractors, customers and the general public.
- » Look out for the safety, health and wellbeing of ourselves, each other, our customers and guests to prevent any potential harm or injury.

- » Remain honest and act with high standards of personal integrity, and never make, aid or accept bribes or improper payments.
- » Exercise caution when accepting gifts, prizes and hospitality, and only do so in circumstances where it doesn't, and won't be perceived to compromise independence or to be taken as a bribe.
- » Never leverage our position within Megaport for the gain of our own personal business, financial, political, or other outside interests. Also not take advantage of the property or information of Megaport or its customers for personal gain or to cause detriment to Megaport or its customers.
- » Always ensure that our outside interests don't conflict, have the potential to conflict, or appear to conflict with our duties as a Director, Senior Executive or employee of Megaport or Megaport's best interests. Where such conflicts do arise, ensure these are disclosed and dealt with appropriately.

- » Remain devoted to working efficiently, effectively, collaboratively and within our delegated authority.
- » Communicate clearly and with consideration, and ensure that our communications are accurate, lawful, and authorised.
- » Must not engage with the media directly or participate on panels or at speaking events, on Megaport's behalf, without authority.
- » Respect, secure and protect from unauthorised disclosure the confidential information of Megaport, our customers, our employees and any other stakeholder that has trusted us with their confidential information.
- » Proactively ensure we understand and comply with our legal obligations that prohibit the use of inside information for personal or another's gain or passing such information to others.
- » Are clear that using our position, workplace or facilities to advance party political causes or support political parties or their members isn't allowed.