Code of Conduct

Policy Owner: ReFresh OS Pty Ltd **Effective Date:** 22 May 2026

Purpose

The primary goal of ReFresh OS Pty Ltd's Code of Conduct is to foster inclusive, collaborative and safe working conditions for all ReFresh OS Pty Ltd staff. As such, ReFresh OS Pty Ltd is committed to providing a friendly, safe and welcoming environment for all staff, regardless of gender, sexual orientation, ability, ethnicity, socioeconomic status, or religion (or lack thereof).

This Code of Conduct outlines our expectations for all ReFresh OS Pty Ltd staff, as well as the consequences for unacceptable behaviour.

Scope

The Code of Conduct applies to all ReFresh OS Pty Ltd staff. This includes full-time, part-time and contractor staff employed at every seniority level. The Code of Conduct is to be upheld during all professional functions and events, including but not limited to business hours at ReFresh OS Pty Ltd workspaces, during ReFresh OS Pty Ltd-related extracurricular activities and events, while attending conferences and other professional events on behalf of ReFresh OS Pty Ltd, and while working remotely and communicating on ReFresh OS Pty Ltd resources with other staff.

We expect all ReFresh OS Pty Ltd staff to abide by this Code of Conduct in all business matters — online and in person — as well as in all one-on-one communications with customers and staff pertaining to ReFresh OS Pty Ltd business.

This Code of Conduct also applies to unacceptable behaviour occurring outside the scope of business activities when such behaviour has the potential to adversely affect the safety and well-being of ReFresh OS Pty Ltd staff and clients.

Culture and citizenship

A supplemental goal of this Code of Conduct is to increase open citizenship by encouraging participants to recognise the relationships between our actions and their effects within ReFresh OS Pty Ltd culture.

Be welcoming. We strive to be a company that welcomes and supports people of all backgrounds and identities. This includes, but is not limited to, members of any race, ethnicity, culture, national origin, colour, immigration status, social and economic class, educational level, sexual orientation, gender identity and expression, age, size, family status, political belief, religion, and mental and physical ability.

Be considerate. Your work at ReFresh OS Pty Ltd will be used by other people, and you in turn will depend on the work of others. Any decision you take will affect users and colleagues, and you should take those consequences into account when making decisions.

Be respectful. Not all of us will agree all the time, but disagreement is no excuse for poor behaviour and poor manners. We might all experience some frustration now and then, but we cannot allow that frustration to turn into a personal attack. It is important to remember that a company where people feel uncomfortable or threatened is neither productive nor pleasant. ReFresh OS Pty Ltd staff should always be respectful when dealing with other personnel as well as with people outside of ReFresh OS Pty Ltd employment.

Acceptable and expected behaviour

The following behaviours are expected and requested of all ReFresh OS Pty Ltd staff:

- Participate in an authentic and active way. In doing so, you contribute to the health and longevity of ReFresh OS Pty Ltd.
- Exercise consideration and respect in your speech and actions at all times.
- Attempt collaboration before conflict.
- Refrain from demeaning, discriminatory, or harassing behaviour and speech.
- Be mindful of your surroundings and of your fellow participants. Alert ReFresh OS Pty Ltd leaders if you notice a dangerous situation, someone in distress, or violations of this Code of Conduct, even if they seem inconsequential.
- Remember that ReFresh OS Pty Ltd events may be shared with members of the public and ReFresh OS Pty Ltd customers; please be respectful to all patrons of these locations at all times.

Unacceptable behaviour

The following behaviours are considered harassment and are unacceptable within our community:

- Violence, threats of violence or violent language directed against another person.
- Sexist, racist, homophobic, transphobic, ableist or otherwise discriminatory jokes and language.
- Posting or displaying sexually explicit or violent material.
- Posting or threatening to post other people's personally identifying information ("doxing").
- Personal insults, particularly those related to gender, sexual orientation, race, religion, or disability.
- Inappropriate photography or recording.
- Inappropriate physical contact. You should have someone's consent before touching them in any manner.
- Unwelcome sexual attention. This includes sexualised comments or jokes; inappropriate touching, groping, and unwelcome sexual advances.
- Deliberate intimidation, stalking or following (online or in person).
- Advocating for, or encouraging, any of the above behaviour.
- Repeated harassment of others. In general, if someone asks you to stop, then stop.
- Other conduct which could reasonably be considered inappropriate in a professional setting.

Modern slavery and ethical sourcing

ReFresh OS Pty Ltd is committed to ensuring there is no modern slavery or human trafficking in our supply chains or in any part of our business. Personnel are expected to act consistently with ReFresh's Modern Slavery Statement, including in their dealings with suppliers, partners, and contractors. Suspected breaches of the Modern Slavery Statement should be reported through the channels described under "Reporting violations" below.

Weapons policy

No weapons will be allowed at ReFresh OS Pty Ltd events, office locations, or in other spaces covered by the scope of this Code of Conduct. Weapons include but are not limited to guns, explosives (including fireworks), and large knives such as those used for hunting or display, as well as any other item used for the purpose of causing injury or harm to others.

Anyone seen in possession of one of these items will be asked to leave immediately and will be subject to punitive action up to and including termination and involvement of law enforcement authorities. ReFresh OS Pty Ltd staff are further expected to comply with all state and local laws on this matter.

Consequences of unacceptable behaviour

Unacceptable behaviour from any ReFresh OS Pty Ltd staff, including those with decision-making authority, will not be tolerated.

Anyone asked to stop unacceptable behaviour is expected to comply immediately.

If a staff member engages in unacceptable behaviour, ReFresh OS Pty Ltd leadership may take any action deemed appropriate, up to and including suspension or termination.

Reporting violations

If you are subject to or witness unacceptable behaviour, or have any other concerns, please notify an appropriate member of ReFresh OS Pty Ltd leadership as soon as possible. Reports related to security incidents may also be sent to incidents@refresh.tech.

For matters falling within the protected-disclosure regime (including misconduct, contraventions of Commonwealth law, danger to public safety, tax-related concerns, or retaliation against a discloser), see the **Whistleblower Policy** for the eligible channels, confidentiality protections, and statutory immunities that apply under *Corporations Act 2001* (Cth) Part 9.4AAA and related regimes.

It is a violation of this policy to retaliate against any person making a complaint of unacceptable behaviour or against any person participating in the investigation of (including testifying as a witness to) any such allegation. Any retaliation or intimidation may be subject to punitive action up to and including termination.

Disciplinary action

Personnel who violate this policy may face disciplinary consequences in proportion to their violation. ReFresh OS Pty Ltd management will determine how serious an employee's offence is and take the appropriate action.

Version history

Version	Date	Description	Author	Approver
1.0	24 Jun 2025	Initial version	Harrison Kennedy	Harrison Kennedy
2.0	22 May 2026	Refreshed under annual review with updated cross-references and intake channels.	Taylor Laing	Harrison Kennedy