

## Code of Conduct

Our Code of Conduct (**Code**) sets out the standard of conduct and behaviour that we expect and require of our people. It also reflects the expectations of our customers, suppliers, the community and our shareholders. We all need to understand this Code, both in words and spirit, and use the Code to guide our decisions.

This Code was developed with the full support of the Fleetwood Board and Executive Team and compliance with the Code is expected. Breaches of the Code will be taken very seriously.

### 1. How this Code applies to you

This Code applies to all representatives of Fleetwood, including directors, officers and employees of Fleetwood and contractors acting on behalf of Fleetwood, as well as suppliers to and business partners of Fleetwood.

This Code also applies to you whenever you are identified as a representative of Fleetwood, including when you are outside of the work environment.

If you have any questions or concerns about this Code, please contact Fleetwood's General Counsel & Company Secretary.

### 2. What we expect of you

As a member of the Fleetwood team you are expected to act with integrity, honesty and fairness and be responsible and accountable for your conduct. You must:

- perform your duties with care and diligence, and seek to achieve excellence;
- act in accordance with Fleetwood's values: Zero Harm, Collaboration, Integrity, Accountability and Growth through Innovation;
- understand and comply with the laws and policies that apply to you; and
- deal fairly with our customers, suppliers, business partners and other team members.

Speak up if you have concerns or if you see or hear of something that may breach this Code.

#### **Whistleblower Policy**

*Fleetwood encourages employees and external stakeholders to report any improper conduct they encounter. All complaints are investigated in a fair and objective manner, including via external parties (where appropriate). Fleetwood employees or stakeholders who wish to make a disclosure can do so by contacting a Whistleblower Officer or Fleetwood's external hotline provider. See Fleetwood's Whistleblower Policy for further information.*

### 3. Making good decisions

Taking the right actions and making good decisions is our goal. If the right thing to do is not clear, ask yourself:

- Is it consistent with our Code?
- Is it legal?
- Does it follow our policies?
- Does it benefit Fleetwood as a whole – not just a certain individual or group?
- Would I be comfortable if my actions were made public?

If you can answer 'YES' to the above questions, you are likely taking the right action. If any answers to the above questions are 'NO' or even 'MAYBE', please stop and ask your manager for guidance.

## 4. Continuous disclosure and insider trading

As a company listed on the Australian Securities Exchange (**ASX**), Fleetwood has obligations to comply with the *Corporations Act 2001* (Cth) and the ASX Listing Rules. Failure to meet these obligations could be a breach of the law and damage our reputation. All Fleetwood team members must be aware of the rules around continuous disclosure and insider trading.

### 4.1. Continuous disclosure

Fleetwood is required to provide timely and accurate disclosure of information to the ASX to enable investors to make informed decisions.

Market sensitive information must be disclosed to the ASX immediately, subject to any exceptions under law. 'Market sensitive' information is information that a reasonable person would expect to have a material impact on the price or value of Fleetwood's shares. For example, the award of a material contract or periodic financial reports such as half year and full year reports.

Disclosure of market-sensitive information must always be released to the ASX before it is provided to the media, any other person or published on our website.

### 4.2. Insider trading

You should never deal in the securities (including shares) of Fleetwood or other listed entities if you have inside information in relation to those securities.

'Inside information' is information that is not generally or publicly available and, if it was, a reasonable person would expect it to materially affect the price or value of those securities.

If you are in doubt about whether you are free to trade in Fleetwood securities, please refer to Fleetwood's Securities Trading Policy for further information or seek the advice of Fleetwood's General Counsel & Company Secretary.

## 5. Public communications and social media

### 5.1. Public communications

Public disclosures and public statements about Fleetwood must only be made by an authorised spokesperson. If you receive a request for information and you are not authorised to respond to the enquiry, refer the request to your manager.

### 5.2. Social media

Social media provides a platform to help share Fleetwood's vision, values and external communication. Refer to Fleetwood's IT Policy HRM-2.14 and Fleetwood's Social Media Policy HRM-2.15 for further information.

If you engage in social media you must be mindful of how any posts could reflect on Fleetwood and must not:

- divulge or discuss any confidential or personal information obtained as a result of your position or role, including information regarding Fleetwood's operations, projects, business, prices, financial position, security or activities;
- post comments or materials online about Fleetwood unless you are authorised to maintain social media coverage for Fleetwood;
- place posts or photos on social media that may be misconstrued or imply an activity, information or an outcome that is not correct or misleading; or
- post anything that might be considered offensive or constitute a threat, intimidation, harassment or bullying.

#### **Watch what you say**

*Remember that sharing non-public information with friends or family or discussing it in public places or on social media can put that information at risk of being disclosed or possibly misused. Please keep it safe.*

## 6. Anti-bribery and corruption

Fleetwood does not engage in or tolerate corrupt business practices and is committed to maintaining and implementing appropriate measures to prevent bribery and corruption by anyone representing Fleetwood.

A bribe may be in the form of cash, gifts, entertainment, secret commissions or other benefits. For further details, see Fleetwood's Fraud, Bribery and Corruption Prevention Policy.

### 6.1. Gifts and entertainment

We acknowledge that you may give or accept gifts or entertainment and hospitality in the course of your work for Fleetwood. However, you must ensure these are appropriate. They should only be of a moderate value and not give rise to any perceived or actual conflict of interest or undue influence.

'Moderate' can vary depending on the circumstances and usually include lunches, dinners and occasional gifts. As a guide, Fleetwood team members are required to record all gifts and entertainment valued at or above \$200 to their manager for authorisation prior to accepting the gift or entertainment.

**Q:** *A supplier sent me a food hamper. Can I accept it?*

**A:** *You can accept small gifts of a modest value. However, if the gift could be perceived to influence or interfere with your decision-making, use common sense in whether to accept it and talk to your manager.*

**Q:** *Can I invite a customer to spend a weekend at my vacation home?*

**A:** *It is generally inappropriate to offer something of more than a modest value to a customer, distributor or vendor. However, if you have a close personal relationship with that person, this may be acceptable under certain conditions. You should discuss the situation with your manager*

### 6.2. Politicians and government officials

Any dealings you have with politicians and government officers which relate to Fleetwood must be at arm's length and avoid any perception of attempts to gain advantage. Attendance at political and policy forums and functions require the approval of your manager.

Any political donations and contributions require Board approval.

## 7. Conflict of interest

A conflict of interest covers any circumstance where an employee's personal interests conflict (or appear to conflict) with those of Fleetwood, or cast doubt on an employee's ability to act appropriately regarding the interests of Fleetwood as a whole.

Your personal interests should not conflict with your duties and obligations to Fleetwood. Under no circumstances should you use Fleetwood's name or information or your position for personal gain.

A conflict of interest itself is not necessarily a problem but it must be promptly disclosed and properly managed.

To manage conflicts of interest, you must:

- disclose any actual or perceived conflict of interest to your manager;
- seek approval from your manager before accepting any outside business interests, including non-Fleetwood work, directorships, partnerships or other interests which have the potential to create a conflict of interest; and
- keep an arm's length relationship when dealing with customers and suppliers.

## **8. Health and safety, inclusive culture and workplace and human rights**

Fleetwood is committed to treating everyone with respect, valuing diversity and providing a safe working environment. Each Fleetwood team member is responsible for fostering a safe and inclusive culture and workplace.

### Health and safety

We are committed to providing a safe working environment and complying with all workplace health and safety laws and standards of best practice to ensure that all of our people are protected from harm.

We all need to take responsibility for our own health, safety and wellbeing and for those we work with.

You can take responsibility by:

- reporting any health and safety issues immediately;
- adhering to health and safety policies and following safety instructions at all times; and
- promoting a positive health and safety culture that is based on the principle that all accidents and incidents can be prevented.

### Inclusive culture and workplace

Fleetwood is committed to providing a workplace free of harassment, violence, bullying and discrimination.

All Fleetwood team members are expected to foster a respectful and inclusive workplace.

An inclusive workplace is one where people feel they can be themselves and are welcome, regardless of their gender, gender identity, age, ethnicity or cultural background, sexual orientation, religion, health and physical ability or educational background.

Refer to Fleetwood's Equal Opportunity, Discrimination, Bullying & Harassment Policy HRM-2.5 for further information.

### **8.1. Human rights**

Fleetwood expects you and all those we work with to respect human rights and to maintain a work environment where human rights are valued.

We are committed to ensuring that our operations and supply chains do not engage in modern slavery practices. If any human rights violations are reported to or identified by us, we will respond appropriately to remedy the matter.

## **9. Proper use of Fleetwood's assets, confidentiality and privacy**

### **9.1. Proper use of assets**

You must use your best efforts to protect Fleetwood's equipment, systems, buildings, services and other resources made available to you to do your job and ensure those assets are used only for authorised purposes (that is, conducting Fleetwood's business) and not for personal benefit.

Personal use of some assets is permitted within reason but may require approval from your manager and must be appropriate, lawful and not interfere with your work.

### **9.2. Confidentiality**

During your work, you will come across confidential information about Fleetwood.

'Confidential information' includes any information that is not generally available to the public concerning Fleetwood's activities, results or plans including financial, marketing or technical information, tenders, contracting strategies and plans, customer lists, business plans, designs, drawings, techniques, processes or any other form of intellectual property. You must use confidential information only for the purpose of doing your job.

If you are unsure whether information is confidential, you should seek advice from your manager.

### **9.3. Privacy**

Fleetwood collects, uses, and discloses and stores personal information about individuals as part of its business operations. We are committed to recognising and respecting privacy in the management of personal information according to the Australian Privacy Principles as defined in the *Privacy Act 1988* (Cth).

You must ensure the security and management of personal information is in accordance with Fleetwood's Privacy & Confidentiality Policy HRM - 2.8.

### **10. Reporting non-compliance with this Code**

Compliance with the Code is expected. Suspected breaches will be investigated and taken very seriously.

If you are found to have breached the Code, you may face disciplinary action up to and including termination of your employment.

If you believe any person has breached this Code, you should report the breach to your manager, who must report the breach to Human Resources or to the General Counsel & Company Secretary. Such report will be treated confidentially to the fullest possible extent, while maintaining Fleetwood's obligation to deal with the matter openly and in compliance with applicable laws.

The General Counsel & Company Secretary will inform the Board of any material breaches of this Code.

### **11. Review**

The Board will, at least once every three (3) years unless otherwise required, review this Code to ensure that it is operating effectively and consider whether any changes are required. This Code has been approved by the Board and may be reviewed and amended by the Board at any time.