

**Shaver Shop Group Limited**  
ACN 150 747 649

## **Code of Business Ethics**

### **Part A – Scope and application**

#### **1 Commitment to operating an ethical business**

Shaver Shop Group Limited (**Shaver Shop**) and its subsidiaries (**Group**) are committed to operating its business honestly and fairly and with good ethical standards. We are proud of the quality of our employees and of the professional reputation built by their work. This Code reflects our standards when dealing with all our stakeholders and our commitment to complying with all applicable laws.

Our stakeholders are any person or entity with whom we interact, including Group employees, shareholders, customers and suppliers. Our stakeholders are also the communities where the Group operates and any other parties that have influence over or are influenced by the Group.

Shaver Shop also maintains the Shaver Shop Core Competencies. We believe the Core Competencies compliment and support the Code and vice versa. The Code provides a framework in which the Core Competencies are to be implemented and pursued.

Our Core Competencies are:

- (1) customer focus;
- (2) drive for results;
- (3) accountability; and
- (4) adaptability.

#### **2 Compliance with the Code**

It is the responsibility of every director, employee and individual contractor or consultant of the Group (**Group Personnel**) to comply with the Code.

The Code should be read in conjunction with Shaver Shop's other policies, including the Price Sensitive Information Policy, Securities Dealing Policy, Diversity Policy, Whistleblowing Policy, Anti-Bribery and Corruption Policy, Modern Slavery Policy and Notifiable Data Breach Policy. Copies of all Shaver Shop's policies are available on Shaver Shop's website.

You may contact the Shaver Shop's Director of Human Resources or company secretary (**Company Secretary**) for further information or assistance regarding the application of the Code.

### 3 Our statement of values

Shaver Shop believes it is important to provide a clear set of values that emphasise a culture encompassing strong corporate governance, sound business practices and good ethical conduct.

Our key values underpinning the Code are:

Integrity:	We uphold the highest standards of integrity in all of our actions.
Respect our People:	We value our people, encourage their development and reward their performance.
A will to Win:	We exhibit a strong will to win in the market place and in every aspect of our business. We're grounded by humility and driven by ambition.
Communication:	We operate with transparency by communicating internally and externally with unwavering candour, honesty and respect.
Customers First:	We make every decision and measure every outcome based on our customer experience. We never settle and continuously challenge our ideas of what's possible in order to better meet the needs of our customers.

### 4 You should report behaviour that does not comply with the Code

If a breach of the Code has occurred, the responsible Group Personnel may face legal or disciplinary action, including termination of their employment.

As set out in our Whistleblowing Policy, you are encouraged to report any actual or suspected behaviour that is contrary to the Code, our policies or relevant laws to your manager, Director Human Resources or the Company Secretary.

If you report such behaviour in accordance with our Whistleblowing Policy, your identity will be protected in accordance with our Whistleblowing Policy. We will not tolerate any form of retribution against any person who reports any actual or suspected violations in accordance with our Whistleblowing Policy.

The Audit and Risk Committee will be notified of such a report and the report will be investigated.

## Part B – Your obligations

### 1 You must conduct yourself with integrity and professionalism

Group Personnel must:

- (1) always act in accordance with our values and best interests and not knowingly participate in any unethical or irresponsible activity;
- (2) comply with all laws and regulations that apply to the Group and its operations;
- (3) act honestly and with high standards of personal integrity in all of your dealings for the Group, particularly when making statements or commitments on the Group's behalf;
- (4) maintain high levels of professional conduct when interacting with our stakeholders and when representing the Group in the community;
- (5) not bully, harass, or discriminate on the grounds of racial origin, gender, age, ethnicity, marital status, disability, religious or philosophical beliefs, sexual preference or political affiliation;
- (6) disclose and deal appropriately with any conflicts between your personal interests and your duties as a director, senior executive or employee; and
- (7) report any breaches of the Code in accordance with our Whistleblowing Policy.

### 2 You must comply with the law

You must be aware of and comply with the laws and regulations relating to your work.

Where laws and regulations differ from the Code, you must apply the requirement that sets the higher standard of behaviour.

Ignorance of the law or having a good intention does not excuse your obligation to comply. You must participate in relevant compliance training programs, which we will offer to you at appropriate times.

### 3 You must disclose and manage any conflicts of interest

You must:

- (1) fully disclose any business interest or other matters which may lead to potential or actual conflicts between your personal interests and the Group's interests; and
- (2) act in the best interests of the Group.

You must not:

- (1) use your position within the Group, or the opportunities arising from your position, to seek personal gain;
- (2) accept payments, gifts or entertainment in a way which is inconsistent with the Code or our Anti-bribery and Corruption Policy;
- (3) use Group funds, property, equipment or other resources for personal benefit;

- (4) use your role within the Group for political interests at any time, or for community interests unless authorised by the Board; or
- (5) take for yourself or a third party any opportunity that is discovered through the use of our property, information or your position without the consent of the Board.

#### **4 You must only use inside information for company-related purposes**

Generally speaking, inside information is information that is not publicly available and if it were available, a reasonable person would expect it to have a material effect on the price or value of Shaver Shop's securities.

If you possess inside information about the Group, you must not deal in Shaver Shop's securities or pass that information on to another person or encourage another person to deal in Shaver Shop's securities. Securities includes shares, units or any form of derivatives such as warrants or options. A more detailed explanation is included in our Securities Dealing Policy, with which you must comply.

#### **5 Fair trading and dealing**

We are committed to encouraging fair competition and trading in all markets in which we operate and to behaving with integrity in all dealings with customers, shareholders, government, employees, suppliers and the community.

When dealing with others, you must perform your duties in a professional manner, act with high integrity and strive at all times to enhance the Group's reputation and performance.

#### **6 You must protect our assets**

You must protect and only use Group property and assets (including intellectual property, such as trade secrets, patents, trademarks, and copyrights) for legitimate business purposes.

You must not make improper disclosure, including inadvertent or careless disclosure, of confidential information, such as competitive business strategies and plans, special methods of operation and other information that is of competitive value to the Group.

#### **7 Public disclosures**

As set out in our Price Sensitive Information Policy, we value communication with our shareholders and the public at large. We will comply with our continuous disclosure obligations under the *Corporations Act 2001* (Cth) and the ASX Listing Rules.

You must ensure that you are aware of the requirements of the Price Sensitive Information Policy and act in accordance with it.

#### **8 Employment practices**

##### **Equal opportunity**

The Group is an equal opportunity employer. This means that the Group does not discriminate on the basis of racial origin, gender, age, ethnicity, marital status, disability, religious or philosophical beliefs, sexual preference or political affiliation. We consider allegations of bullying, harassment and unlawful discrimination as extremely serious and will take appropriate action.

The Group promotes and supports a diverse workforce at all levels of the Group. We believe that creating a work environment that attracts, retains, and fully engages diverse talents leads to enhanced innovation and creativity in our products and services. Our approach to diversity is further described in our Diversity Policy. All Group Personnel are expected to be familiar with this policy.

### **Health and safety**

We strive to protect the physical and emotional health of all employees in the workplace and to ensure a safe and hazard-free workplace.

All applicable laws and internal regulations (including occupational health and safety laws) must be fully complied with. All Group Personnel must assist in ensuring this occurs.

You should familiarise yourself with the occupational health and safety policies of the Group and all relevant procedures to ensure the workplace is safe and without risk to anyone's health.

### **Bribes and facilitation payments**

Australia, and other countries in which the Group operates, has strict laws against bribery and corruption. These laws carry serious criminal and civil penalties. We are committed to operating without any instances of bribery or corruption which go against our key values.

As set out in our Anti-Bribery and Corruption Policy, you must not engage in bribery or facilitation payments, except to avoid an immediate threat to your or someone else's safety.

You must exercise care when giving or receiving business-related gifts. You should exercise particular caution in regard to any offers of value, including hospitality, entertainment and gifts when the Group is negotiating a contract and so may be in a position to influence, directly or indirectly the outcome of a decision. There must not be an impression of an improper connection between any gift and business opportunities.

Shaver Shop has a zero tolerance approach to breaches of its Anti-Bribery and Corruption Policy. If you breach this policy, you may face disciplinary action or criminal prosecution, including time in jail and significant fines.

## **9 Responsibilities to the community**

We respect the environment and endeavour to protect our natural resources. To the extent practicable, the Group prevents or otherwise minimises and mitigates harmful effects of the Group's operations on the environment.

You must abide by all local laws and regulations, and are expected to respect and care for the environments in which the Group operates.

We have a strong commitment to the improvement of society as well as the communities we serve and in which we operate. We encourage the support of charitable, civic, educational and cultural causes.

## **10 The Board will periodically review the Code**

The Board will review the Code periodically to ensure that it remains relevant to our needs and any regulatory requirements.

Adopted on 24 September 2020