

# Code of Conduct

## Who does this policy apply to?

This policy applies to everyone who works at Thryv Australia Pty Ltd (**Thryv**), including consultants, temporary workers and contract workers. The policy applies to conduct in the workplace and all work-related activities.

## What is the Code of Conduct?

This Code of Conduct contains the principles that govern the way in which we must conduct ourselves at Thryv.

## What are the guidelines for expected behaviour? As managers, we aim to:

- provide a working environment that is safe, challenging and rewarding;
- reinforce Thryv's commitment to the highest standards in business and professional ethics;
- uphold the principles of equal opportunity; and
- obey the law.

## As employees, we aim to:

- treat customers, the public and fellow employees with honesty, courtesy and respect;
- do our jobs in a safe, responsible and effective manner;
- work within Thryv's policies and rules;
- maintain a work environment free of discrimination, sexual harassment, vilification, bullying, victimisation and adverse action; and
- obey the law.

## Bribes, pay-offs or kickbacks

You should never accept a bribe, pay-off, kick-back or other any other 'benefit paid or received directly or indirectly. In addition, such payments to domestic or foreign government officials to influence a decision or to gain a benefit either directly or through a third party are prohibited. We conduct business in countries with many different laws, customs and business practices. However, you should not compromise the principles set out in this Code, and will abide by the laws of host countries as they may apply.

## Conflict of interest

A conflict of interest exists where loyalties are divided. It is expected you will guard against any possibility of conflict of interest in employment. Examples of situations where conflicts of interest have the potential to arise include:

- purchasing practices;
- engagement of consultants;
- outside employment or outside revenue generating activities;
- giving and receiving gifts, prizes and hospitality

If you think that there may be a possible conflict of interest, you should discuss this with your Manager in the first instance.

## **Corporate assets**

If you have control of Company funds or assets, you are personally accountable for them. "Funds" can mean cash or valuables such as airplane tickets or Corporate Credit Cards.

You must not remove Company property without authorisation or use it for personal benefit or any other improper purpose. Corporate Credit Cards must not be used for personal expenses.

You may use Thryv's technology equipment for reasonable personal use in line with IT procedures and policies.

## **Environment and Sustainability**

Our Company is committed to sustainable business practices and the social, environmental and economic wellbeing of the communities in which we operate. We believe how we do business is as important as what we do. 'Sustainability' to Thryv means supporting the needs of current and future generations through integration of environmental stewardship, social advancement and economic prosperity. We aspire to be a sustainability leader in Australia and rely on our people to be responsible for their role in maintaining and improving our sustainability performance and practices.

## **Equal Opportunity**

Thryv and its management are committed to equal opportunity for all of its employees. Employees must not discriminate against any person on the basis of race, colour, religion, gender, age, marital status, sexual preference, disability, union membership or other factors.

Sexual harassment, bullying, vilification, victimisation and the taking of adverse action against any person will not be tolerated. This requires avoidance of sexual advances or comments; sexual, racial or religious "jokes" or slurs; or any other conduct in the workplace that is intimidating or offensive. Recruitment and promotion will be based on merit. Merit concerns the ability to perform the job and is independent of group membership. Conditions of employment and career development will be applied to all employees in a non-discriminatory manner.

## **Fair competition**

Thryv is committed to competing fairly in the markets in which it operates. Competing fairly means that we will:

- know about and follow Thryv's legal obligations to its competitors;
- compete on the basis of customer service rather than by obstructing competitive conduct; and
- only use our Company's strength in legitimate ways.

Competitive information will be obtained only by ethical means - covert attempts to gain competitive information are not permitted. We should not be insulting about our competitors' products or services.

## **Fair Dealings**

Many of Thryv's customers are small businesses and have the benefit of the unfair contract terms provisions of the Australian Consumer Law.

Thryv is committed to having contracts and processes that promote transparency in their dealings with all customers, but especially small businesses.

Therefore Thryv expects its employees not only to comply with the unfair contract terms law but also the Thryv Unfair Contract Terms Compliance Policy.

### **Outside employment and other activities**

All Thryv employees should keep outside activities separated from Company work. You should not undertake outside employment without first obtaining written approval from your Manager where a conflict of interest is likely to arise. You should also ensure that outside activity does not involve use of Thryv property, information, money, facilities, time or the services of fellow workers.

### **Political associations**

When acting on Thryv's behalf, no action should be made which might be seen as assisting a political party, politician or political candidate. However, this does not include normal hospitality when conducting business. In offshore countries, proposals for the giving of political support or a donation by a joint venture in which Thryv participates should be submitted to the Executive Manager having overall responsibility for Thryv's international business activities.

### **Work environment**

To ensure a safe workplace, the following is not acceptable or permitted:

- smoking in Company premises and vehicles;
- being intoxicated at work or work related functions;
- using, possessing or supplying illegal drugs;
- using offensive language or violent physical behaviour.

### **What is my responsibility if I see a breach of the Code?**

You are responsible for doing something about any illegal behaviour or behaviour falling outside the Code of Conduct in our workplace. Appropriate action may include:

- talking about it with the involved employees with a aim of resolving the matter;
- discussing the matter with your Supervisor or Manager with the aim of resolving it;
- seeking advice or assistance from your HR representative.

### **What are the consequences of breaching this policy?**

Thryv will take action it considers appropriate in relation to breaches of this policy. Disciplinary action may include termination of employment.

Policy	Code of Conduct
Last Updated	September 2021
Policy Group Owner	Human Resources