

Code of Conduct

People & Culture Policy



1. INTRODUCTION

This Code of Conduct is designed to clarify the legal, workplace behaviour and ethical standards that Paragon Care expects in all work-related matters.

2. SCOPE

This Code of Conduct applies to all employees, contractors, consultants, officers (including directors), agents and anyone conducting business on behalf of Paragon Care, hereafter referred to as 'Team Members'. It applies whenever work is conducted for or representing the Company, in any country including outside business hours (e.g. at work or industry functions).

3. POLICY STATEMENT

At Paragon Care, everyone has the right to feel safe and respected in a legally compliant and ethical workplace. We also have a responsibility to ensure our behaviour doesn't adversely affect others. The policy expands on these expectations, but as a summary the Code of Conduct requires Team Members to:

- treat other people with respect and ensure behaviour does not constitute bullying or harassment – see Section 4;
- always act in the best interest of Paragon Care, including representing the company in a positive way through appearance, behaviour, language as well as written and verbal communication – see section 5 and 11;
- avoid or disclose any conflict of interest (real or perceived) – see Section 6, 7 and 8;
- ensure all gifts and payments offered and received are approved, lawful and do not constitute a real or apparent conflict of interest, bribery or corruption – see section 7;
- comply with all relevant laws, policies, procedures as well as any lawful and reasonable directions given by an authorised person – see section 9;
- take reasonable care to ensure safety & health at work, always avoiding adversely affecting the safety & health of others – see section 10;
- use Company resources in a proper manner, for company purposes – see section 12; and
- not make improper use of information, duties, status, power or authority, in order to gain, or try to gain, a benefit or advantage for themselves or someone else – see sections 12-16;

The remainder of this policy provides further explanation about these requirements. Please note that this document cannot cover every situation that may be encountered. If in doubt, please speak to your Manager. It is a requirement of ongoing employment to comply with company policies including this Code of Conduct.

4. TREATMENT OF OTHERS

You are expected to behave in a fair, respectful, polite, professional and inclusive manner to others, and abide by all reasonable instructions relating to the way to treat other people. You should not behave in a way that results in a hostile, intimidating or offensive work environment, or that would be considered bullying, discrimination, vilification, harassment or sexual harassment.

Behaviours that are not appropriate include (but are not limited to):

- unwelcome or inappropriate jokes;
- inappropriate or rude communications including via email or text message. This includes insults, derogatory terms, threats, rumours, insults and inappropriate language;
- displaying of offensive materials and pictures;
- repeated unwelcome invitations or repeated questions or comments about someone's personal life;
- acting in a way that would unfairly harm the reputation and career prospects of others;

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- behaviour that may be reasonably perceived as harassing, intimidating, overbearing, bullying or physically or emotionally threatening towards colleagues or clients;
- unnecessary and unwelcome physical contact, including sexual or aggressive contact;
- discrimination on the basis of irrelevant characteristics including sex, race, disability, pregnancy, age, marital status or sexual preference; and
- excluding others, including withholding information or ignoring their contribution.

5. PERSONAL AND PROFESSIONAL BEHAVIOUR

Team Members are ambassadors for Paragon Care and are expected to represent the company in a positive way at all times. At all times you should be accountable and take responsibility for your actions.

This includes maintaining appropriate conduct, dress and appearance standards and ensuring that appearance is presentable, clean, neat and tidy when at work or representing Paragon Care in any capacity.

It is expected that team members demonstrate honesty and integrity, act with care and diligence and comply with the law. They should ensure they are informed about the legal requirements and social protocols in any country or region they deal with.

6. CONFLICT OF INTEREST

Make sure your duty to Paragon Care does not conflict, or appear to conflict, with your personal interests or duty to any other person or organisation. If any actual, potential or apparent conflict arises, this must be immediately disclosed to your Manager, and any activity ceased until approved in writing by your Manager.

The following are examples of actual or apparent conflicts of interest that should be disclosed:

- you, or a member of your family has an interest or shares in a business providing services to Paragon Care;
- you undertake work for, or have an interest or shares in, a competitor;
- working for any other business without seeking approval (which will not be unreasonably declined), particularly if this impacts your ability to do your job for Paragon Care;
- personal or intimate relationships with other employees, contractors, suppliers or clients; and
- being in a position where you have an influence over remuneration, or allocation of work or hours, of a family member, personal or intimate relationship.

7. GIFTS, BENEFITS AND DONATIONS

Gifts or benefits are not to be offered or accepted if this may create a conflict of interest, or improperly influence you (or look like it has) in the performance of your duties. For example, Team Members are not to offer, demand or accept anything if they are involved in a tender, or to accept anything from a job applicant, where they are involved in deciding who will win the tender or who be offered employment.

Any payment, gift or benefit that is proposed to be payable to a foreign official, political party or candidate must be approved by a member of Exco prior to offer or acceptance. Accurate records of any such transaction will be maintained.

A gift or benefit may include:

- offers of cash, entertainment, gifts, such as bottles of wine, manufacturer's samples or personal items, discounts on items;
- promotional materials, including clothing, books, USB's or pens;
- accommodation, meals, travel benefits or other hospitality; and
- entertainment, such as seats at sporting or theatre events or golf days.

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Where a conflict of interest doesn't exist, you may accept a gift, entertainment, donation or benefit. If valued at more than \$500, you will need your managers approval first. If unsure whether a gift or benefit is appropriate, speak to your Manager or an Exco member.

8. OUTSIDE EMPLOYMENT

Employment at ParagonCare is generally subject to devoting an employee's full time and attention to ParagonCare work, during working hours.

Employees must disclose and obtain written approval prior to undertaking paid or unpaid work (such as volunteer work for a political party) for any other organisation. Approval will not be unreasonably withheld, providing the work does not present a conflict of interest, or affect an employee's ability to perform their work for Paragon Care.

While employed at Paragon Care, employees are not to conduct work (paid or unpaid) for any customer, supplier or competitor of Paragon Care, or that may be in conflict with your position. It is expected that you:

- devote your full time and attention to your duties at Paragon, and not to any other work;
- don't use Company premises or resources (including phones, internet, email, photocopier) for outside work;
- arrive at work in a fit, well-rested state, able to perform your work to the expected standard; and
- don't undertake work that is in conflict with your role at Paragon or makes it difficult to do you role.

9. COMPLIANCE WITH LAWS, POLICIES, PROCEDURES AND LAWFUL DIRECTIONS

Paragon Care is committed to conducting all its business operations and dealings in full compliance with the law. You must ensure you are familiar with and comply with the laws that apply to the company and to your particular role, including the requirement to hold and maintain current licenses. You must ensure that any records you keep or submit are true and complete, including all reports, leave records and expense claims.

You must fully comply with all policies, procedures as published by Paragon Care, as well as any instructions and lawful and reasonable directions. You can access Paragon Care policies and procedures by asking your Manager or on the Policies and Procedures page of the Paragon Care intranet.

Paragon Care will not make any bribes or corrupt payments to customers, suppliers or government officials to obtain any improper or unlawful benefit or advantage. Team Members are strictly prohibited from offering or making any such payments. In the event Team Members become aware of an actual or suspected situation which may lead to bribery or corruption it should be promptly reported to the relevant General Manager or via the whistleblower policy. Refer to the Bribery and Corruption policy for more information.

Team members should take all reasonable efforts to ensure any Agents or third parties engaged are reputable and informed of the requirement to comply with this policy.

10. HEALTH AND SAFETY

You must ensure you are familiar with and comply with all policies and instructions relating to health, safety and environment, and never compromise your health and safety, or put the health and safety of others at risk. You are responsible for ensuring you arrive in a fit state to work, disclosing (to your manager) any medical conditions/medications that may impact you at work, and for following all safety requirements, including wearing protective equipment. You must not come to work if you are under the influence of illicit drugs or alcohol and must not consume these during your work shift.

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11. PUBLIC STATEMENTS INCLUDING SOCIAL MEDIA USE

Public statements or comments should only be made by those expressly authorised (in writing) to do so. This includes any public comments about the company's performance and any activity that may impact or involve Paragon Care or its employees, whether directly or indirectly.

Unless authorised, the Company's relationships with the media and the investment community are to be conducted exclusively by the Company's Board, Chairman, Chief Executive Officer or Chief Financial Officer.

Team Member activity on social media for the purposes of company marketing and recruiting are permissible, but activities must be conducted in line with the Company's Social Media Policy.

Your conduct on social media is public record and should never reflect negatively on the company or your colleagues or decisions made at work, or reference confidential information.

12. USE OF COMPANY RESOURCES

"Company Resources" means all property, assets, equipment, vehicles, IT Resources, funds, facilities, Confidential Information, Intellectual Property and/or services, belonging to Paragon Care, including those provided by third parties.

You must use Company Information and Resources in an appropriate and professional manner for authorised, lawful, work-related, purposes, and protect them from misuse. This means you would never:

- use tools belonging to Paragon Care on work for a third party;
- use a vehicle belonging to Paragon Care other than for authorised purposes;
- use a credit card / petrol card belonging to Paragon Care for unauthorised personal use;
- take equipment belonging to Paragon Care for personal use;
- remove resources from the company's premises or leave them unsecured; and
- share information which is not public, and which could affect the company's values or its securities (refer to the Securities Trading Policy for further information).

13. USE OF INFORMATION TECHNOLOGY RESOURCES

"IT Resources" include electronic systems belonging to Paragon Care, such as computers, computer systems and software, handheld computers, mobile phones and the internet. You are required to comply with any IT policies in place, and always:

- maintain the security of computer systems and network (including passwords);
- comply with licensing and copyright requirements;
- use IT Resources in an appropriate and lawful manner, including ensuring that you do not access, store or distribute potentially offensive or illegal materials; and
- use IT Resources in a way that does not result in unlawful sexual harassment, discrimination, victimisation or bullying.

Usage is monitored on an ongoing and continuous basis to ensure compliance with company policies. Information transmitted or received by IT Resources may be monitored, intercepted and viewed by authorised persons, subject to relevant laws, including privacy laws.

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14. USE OF CONFIDENTIAL INFORMATION

"Confidential Information" includes information relating to Paragon Care, operating procedures; financial information; business and strategic plans; technology, databases, computer software and programs; passwords, employee information; trade secrets; marketing information; evaluations, supplier and customer information.

You may have access to, and knowledge of, confidential Information belonging to Paragon Care. You should never, use or disclose Confidential Information except as authorised or required in the legitimate performance of your duties. In addition, you must protect information from inappropriate use and immediately notify your Manager of any suspected breach or actual unauthorised use, copying or disclosure of Confidential Information by you or someone else, whether deliberate or accidental.

Information concerning the activities or proposed activities of Paragon Care, which is not public and which could materially affect the Company's value of its securities must not be used for any purpose other than valid Group requirements. Please refer to the Company's Securities Trading Policy for further information on Insider Trading.

You must ensure that any third parties sign Paragon Care's standard confidentiality agreement (available from Legal Counsel) prior to engaging in detailed discussions or negotiations that require confidential information to be disclosed.

15. USE OF POSITION

You must not use your position within Paragon Care in order to gain, or seek to gain, a benefit or advantage for yourself or any other person.

16. USE OF INTELLECTUAL PROPERTY

You must protect Paragon Care's Intellectual Property from unauthorised use or misappropriation. "Intellectual Property" includes all inventions, models, designs, drawings, plans, software, reports, proposals and other materials created or generated by you in the course of your work (whether during or outside your working hours), for use by Paragon Care. Intellectual Property rights include, but are not limited to, patents, copyright, registered designs, trademarks, the right to have Confidential Information kept confidential, and any application or right to apply for registration of these rights.

Intellectual Property created or generated by you within your employment or engagement or resulting from your work is the sole property of Paragon Care unless otherwise agreed in writing.

17. OBLIGATIONS AFTER LEAVING PARAGON CARE

If you leave Paragon Care (including for other employment, self-employment or contract work), you must not:

- while you are still employed by Paragon Care, use your position to influence decisions and advice in favour of your new employer;
- take or retain copies of any Paragon Care files, records, correspondence, including emails on mobile devices;
- reveal confidential or sensitive information to your new employer (including your own business if you pursue self-employment) or provide other information that would give your new employer/ business an advantage;
- use your knowledge of, and contacts within, Paragon Care to lobby or otherwise seek advantage for your new employer / own business in dealing with Paragon Care and / or;
- breach the terms of your contract, which prevent you for a period of time from:
 - directly or indirectly solicit a Paragon Care employee to leave employment with the company,
 - working for a client or customer or soliciting business from a client or customer.

If unsure whether your new employment could present a conflict of interest, speak to your Manager.

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18. BREACHES OF THE CODE OF CONDUCT

Paragon Care views breaches of this Code as misconduct. Employees who have become aware of any breaches of this Code must report the matter immediately to their General Manager or the Company Secretary.

It is critical that you report any conduct you are concerned is:

- fraudulent;
- corrupt;
- in breach of regulatory or legal requirements;
- unethical (either representing a breach of this Code of Conduct or more generally);
- conduct that jeopardises the safety of personnel, the work environment or public safety;
- other serious improper conduct; or
- any other conduct which may cause negative impact the company or a customer.

Paragon Care wants legitimate concerns to be reported without fear of negative impact. While you are encouraged to report issues to your Manager, if you don't feel you can do this, you may wish to consider reporting to a General Manager you trust, or via the company's whistleblower policy. Team members who report a breach or suspected breach in good faith will not be subject to retaliation or recrimination for making that report.

If you send in an anonymous complaint, you should detail any relevant information to enable the concern to be properly investigated. Please be aware that you will not receive a response or updates.

Suspected breaches will be investigated prior to determining if disciplinary action is appropriate.

19. CONSEQUENCES OF A BREACH

Paragon Care expects full compliance with this Code of Conduct, including disclosure of any observed breaches.

The company may take disciplinary action, including terminating your employment or engagement for breaches that amount to serious misconduct.

20. FURTHER ASSISTANCE

Any questions about this Code should be referred to your Manager, or a People and Culture team member.

21. DOCUMENT AUTHORISATION

Document Authorisation			
Revision:	1	Effective Date:	
Prepared by:	Marysol Gallego	Date:	11/11/25
Checked by:	David Collins	Date:	11/11/25
Authorised by:	David Collins	Date:	19/11/25
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