

Code of Conduct

At Speciality Fashion Group (SFG), our mission is to *make women everywhere look good and feel great*. We expect our Team Members will actively work towards our mission and act in the best interest of our Company and our customers. Each day we interact with a variety of individuals and groups and we are committed to showing consideration and courtesy to colleagues, customers, shareholders, suppliers and the community and interacting in a respectful and ethical manner.

The SFG Code of Conduct applies to all Team Members and directors of the company. It describes our values and behaviours we are committed to as a company and sets out the standards within which Team Members and directors are expected to act. The Code of Conduct does not describe every situation you may encounter, nor does it replace other detailed SFG policies, instead it outlines the standard of business, and guides us on the way we behave with each other and with our customers.

The Code of Conduct is about developing a consistent understanding of desired behaviours, towards each other and with our business partners, that is people other than Team Members who are associated with Specialty Fashion Group. Where appropriate the expected conduct is elaborated upon in policy and procedure guidelines for specific job descriptions within each division.

Our Values

At SFG, SHIRTFITS is very much the personality of our organisation and it has been created to demonstrate the way we expect our Team Members to behave. We believe that our strong culture is behind our success. Our values are about 'how we do things around here'. It is important that SHIRTFITS is lived through what you do and how you do things:

Service: I'm caring and responsive to our customers, both internal and external

Humility: I value and recognise my colleagues equal contribution to SFG's success. I'm a team player and am modest and approachable

Integrity: I'm honest and ethical in all my work and interactions

Respect: I treat all people with dignity and respect

Trust: I am open and honest when communicating with people

Fun: I will create a fun atmosphere

Innovation: I will champion innovation

Talent: I will nurture talent

Safety: I will contribute to a safe, secure & sustainable approach to our work life as we accomplish our mission.

It is through our behaviour in the workplace that we demonstrate our commitment to our values and the acceptance of our responsibilities. We live our core values through maintaining standards in our behaviour.

Team Member Conduct

Whilst working for SFG, I will;

- Treat other people with respect and fairness;
- Always perform all duties as directed to the best of their ability;
- Be punctual and regular in attendance;
- Observe normal safety practices;
- Refrain from inappropriate behaviour;
- Behave in a responsible manner by not damaging, stealing, modifying or misusing property;
- Maintain confidentiality and responsibility to the individual, customer or other, with information gained through your work
- Behave in a responsible manner by not harassing fellow Team Members or any other person with whom they come into contact with;
- Report unethical, illegal or improper behaviour, including breaches of the Code of Conduct or Business Standards
- Not attend work whilst under the influence of alcohol and/or drugs; and,
- Not engage in any behaviour that could offend, embarrass or threaten others.
- Do not engage in any behaviour that is in breach with our Workplace Behaviour Policy/ Workplace Behaviour Policy/Integrity Policy

Business Standards

Compliance with the Law and Regulations

The directors and Team Members of Specialty Fashion Group are bound by the laws of the country and they must comply with the spirit, as well as the letter, of the law. In the event Team Members have concerns about legal issues, legal advice must be sought before any decision is taken.

Act Honestly and Professionally

The directors and Team Members of Specialty Fashion Group must strive to act honestly, in good faith and in the best interests of the Company as a whole. Any employee who believes activities may compromise Specialty Fashion Group interests should advise an appropriate manager or call the SFG Speak Up hotline. Appropriate behaviour must be maintained at all times on the company's premises.

Appropriate use of Office

The directors and Team Members of Specialty Fashion Group must use the powers of office for a proper purpose and in the best interests of the Company as a whole. They must exercise their powers of office with due care and diligence in fulfilling the functions of that office. They must not take improper advantage of their position in the company. Team Members must fulfil their role as appropriate and follow correct and reasonable instructions of management.

Conflict of Interest

Team Members owe their first business loyalty to Specialty Fashion Group. Directors must be independent in judgment and actions. The directors and Team Members of Specialty Fashion Group

must not allow personal interests, or the interests of any associated person, to conflict with the interests of the Company. Should they feel that they have a conflict this should be disclosed and they should absent themselves from any further decisions where the conflict exists. Directors should declare any vested interest in any matter discussed at the Board meetings and to remain separate from and independent of the decision making process.

Protection of Specialty Fashion Group Interests

The directors and Team Members of Specialty Fashion Group must recognise the primary responsibility is to the Company's shareholders but should, where appropriate, have regard for the interests of all stakeholders of the Company.

Professional Conduct

Directors and Team Members of Specialty Fashion Group have a responsibility to maintain the highest levels of professional conduct in their interactions with colleagues, business partners and in representing Specialty Fashion Group in the community. Team Members must maintain business relationships in a manner which is consistent with the principles of respect for others, integrity and fairness and which meet, as a minimum, the laws applicable to behaviour in the work environment.

Discrimination and harassment

All forms of discrimination and harassment, including bullying are prohibited.

Inside Information

Refer External Communications Policy

Share Trading Policy

Refer Securities Trading Policy

Protection of Information Privacy

Team Members should exercise care in conversation outside Specialty Fashion Group and not use company information or other company resources for private purposes.

The directors and Team Members of Specialty Fashion Group must respect the confidentiality and observe the privacy of information about business partners and fellow Team Members.

The obligation of customer and Specialty Fashion Group information privacy remains even after leaving Specialty Fashion Group employment.

Confidentiality of Company Information

Confidential information received by a Director or Employee in the course of the exercise of their duties remain the property of the Company from which it was obtained and it is improper to disclose it, or allow it to be disclosed, unless that disclosure has been authorised by the Company, or the person from whom the information is provided, or is required by law.

Directors and Team Members of Specialty Fashion Group handle commercially sensitive information relating to the Company, and its business partners. People entrusted with confidential information should ensure it is securely stored and properly managed, with particular attention to the protection of information on computers.

Information that may be released to legitimately interested parties shall only be provided through authorised Team Members. Obligations of confidentiality and proper use of information continue even after leaving Specialty Fashion Group employment.

Action within Delegated Authority

Each director and employee of Specialty Fashion Group has a level of authority within which they can act, and managers have a responsibility to inform all Team Members of the limits of their authority. When uncertain of their authority, or of matters relating to policy, Team Members should seek clarification before acting on behalf of Specialty Fashion Group.

Improper Benefits

Directors and Team Members of Specialty Fashion Group shall not accept payments, gifts or entertainment beyond that which is considered as normal business practice. If any such benefit is offered that could be construed by others as improper, the offer shall be reported to an appropriate manager.

Misappropriation

Directors and Team Members of Specialty Fashion Group shall not misuse funds or property, nor assist others to do so. Where Team Members are found to be involved in misappropriation, disciplinary action will be taken and may result in the matter being notified to police.

Observance of the Code of Conduct

Specialty Fashion Group managers shall make the Code of Conduct known and accessible to all Team Members, contractors and professionals who have a business association with Specialty Fashion Group. All Team Members and Specialty Fashion Group business partners should take care that its application is enacted in word and spirit.

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