

CODE OF ETHICS POLICY STATEMENT

PSAB AUSTRALIA PTY LTD's values include open communication, honesty and continuous improvement. In achieving our commercial goals, we must be true to our values, vision and mission. This Code expresses PSAB's commitment to business integrity. It applies to all individuals, and we expect all our partners to abide by the same standards when working with us.

No bribes including facilitation payments. PSAB abides by all applicable domestic laws where we operate. We prohibit bribery to anyone, and the making of undue payments or kickbacks in any form whether direct or indirect. If an PSAB employees or agents are exposed to such demands – or think they might be – they must report the details to senior management as soon as possible.

Gifts and hospitality

PSAB AUSTRALIA PTY LTD prohibits the offer or receipt of gifts or other benefits that could affect either party's impartiality, influence a business decision or lead to the improper performance of an official duty. This principle applies to our relationships with suppliers, officials and anyone else with whom we deal in the course of our work.

PSAB employees and contractors may offer and accept reasonable hospitality given in the normal course of business. However, in all cases we must ensure that the gift or benefit is offered as an expression of good will and not in expectation of a return favour.

Employees/contractors must not offer or accept gifts, entertainment or gratuities whose value exceeds the financial limits articulated in PSAB's policies and procedures. In the case of a gift, entertainment or gratuity exceeding the relevant financial limit, the employee is to record the gift in a Gifts register. The register will be subject to audit.

Business partners supplying services to PSAB Australia Pty Ltd

PSAB AUSTRALIA PTY LTD will engage a broad range of business partners to work on its behalf including agents, representatives, consultants, subcontractors and suppliers. PSAB is committed to the principles of openness and transparency in our dealings with all of them and expects the same commitment in return.

Fair competition

We compete fairly and honestly, observing all anti-trust and competition laws. We are truthful in every detail concerning our services when we advertise or solicit for business.

Personal conflicts of interest

PSAB AUSTRALIA PTY LTD employees/contractors must avoid conflicts of interest (both real and perceived). For example, we do not compete with affiliated companies



(02)6198 3388



enquiries@psab.net.au



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either directly or indirectly, or use knowledge gained while working for PSAB to help anyone else compete with it.

Similarly, PSAB employees/contractors must not do business on behalf of PSAB with a company from which we or a family member or another connected person may directly benefit without prior written approval of the **Owner and Public Officer**.

PSAB employees/contractors are not to have personal interests (either individually or through family) in companies that compete with or do business with PSAB unless the relevant employee has prior agreement with the **Owner and Public Officer**, although PSAB employees/contractors can of course own shares in publicly traded companies. 'Family' includes spouse/partner, children, parents, siblings, civil partner or step-children. Any conflict of interest that does arise should be raised with the **Owner and Public Officer**.

Books and records

We take care to maintain accurate books and records that reflect our business transactions as they occur, and we keep them for as long as legally required.

Charitable donations

We will only provide donations to organisations that serve a legitimate public purpose and are themselves subject to high standards of transparency and accountability. Our contributions will always be transparent and properly documented.

Political neutrality

We do not make donations to political parties or to any other government officials.

Seeking guidance and reporting problems

If any employee wishes to seek guidance on the application of this Code, they must seek guidance from the **Owner and Public Officer**.

Compliance and implementation

These principles are endorsed by the Board and apply to all including, where possible, associates, agents and joint ventures involving PSAB. It is the responsibility of all supervisors and managers to ensure they are disseminated and fully understood at every level throughout PSAB.

PSAB AUSTRALIA PTY LTD will not criticise or penalise employees for any loss of business resulting from adherence to these principles. Similarly, we will not

penalise employees who report concerns in good faith even if on closer investigation these turn out to be unfounded. However, we take infringements very seriously. Employees who fail to abide by these principles may face disciplinary action.





This policy is fully supported by both the PSAB AUSTRALIA PTY LTD's Board and Senior Leadership Team.

Satish Ayyalasomayajula
CEO - S&IG
Secure & Innovate Pty Ltd
November 2020

Rao Ayyalasomayajula
Owner and Public Officer
Secure & Innovate Pty Ltd
November 2020



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