



***SDS***

ACHIEVING EXCELLENCE

# CODE OF CONDUCT

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## SECTION 1

# MESSAGE FROM OUR CEO

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## OUR VALUES AT WORK

At SDS we are committed to the highest standards of integrity and accountability. We care about our team members' health and well-being by providing a safe work environment and encouraging a healthy lifestyle. Above all, we aim to be fair and honest with our team and to provide them with meaningful, challenging work. We believe no one has a monopoly on good ideas, and, in order to grow professionally, we will work with anyone who has constructive proposals for improved performance. Guiding all of us as we do business every day is our Code of Business Conduct (Code).

The Code represents our commitment to act ethically, responsibly and lawfully. It ensures that we make the right decisions as we work towards achieving our Vision, Mission and Values.

Our Code outlines the expectations of behaviour and conduct that we place on ourselves and towards each other in our daily work. Our Code sits across all areas of our business and applies to everyone, providing detailed information, guidance and resources which our professionals can refer to in helping them to make ethical and the right professional choices a foundation for trusted relationships. In short, our Code is essential for our success.

Our Code also incorporates our Whistleblower Procedure, which outlines how you can report a business conduct concern, what happens when you do and how we will protect you for doing so. We all have a shared responsibility and I encourage you to speak up, even when it's tough, when our Values and standards are not being followed.

Please take the time to read and understand our Code so you can live it in your everyday work. You can find the Code, as well as our corporate governance policies on our website.

Thank you for helping SDS make a difference now, and for the future, by following our Code.



**Stewart Mason**  
Chief Executive Officer

## OUR VISION

Bringing people home safely.

## OUR MISSION

We take the lead on critical-risk activities for our clients so they can focus on their core business.

## OUR VALUES

-  Our People are key to our success.
-  Providing a quality service and focus on our customer's experience.
-  We focus on solutions not problems and embrace simplicity over complexity.
-  Embracing ownership and achieving excellence in everything we do.

## ABOUT US

Safety Direct Solutions Pty Ltd (SDS) is a Registered Training Organisation (RTO #51632) and a leading provider of critical risk, security, fire, rescue and medical training and emergency services personnel in the Australasian region. SDS was founded in 2004. SDS transformed its management system into an Integrated Management System and has been awarded ISO 9001 Quality Management System, ISO 14001:2015 Environmental Management System and ISO 45001:2018 OH&S Management System.

In 2019 SDS signed a partnership agreement with International SOS (ISOS). International SOS is the dedicated and specialised lead for the delivery of high-quality medical support to national governments and Non-Government Organisations operating in complex and demanding environments around the world.

The medical and operational combination of both companies enables SDS to provide the full suite of healthcare and occupational health services, provides greater resilience and enhances overall service quality, efficiency and capability.

Specifically, SDS is the International SOS dedicated and specialised lead for delivery of high-quality medical and emergency response support in Australasia.

SDS provides both clinic-based and remote site services including pre-hospital emergency response, primary health, health and lifestyle experts, dental and physiotherapy services, trauma management, deployment of medical capability to remote areas, provision of equipment and supplies, as well as development of medical emergency response plans. From a compliance perspective, we provide operational oversight; SDS manages medical, safety, health, wellbeing, and occupational health services compliance.

SDS set the benchmark in Australia for excellence in safety training and emergency management. Our people have extensive industry experience, and we train them to an even higher standard, where our clients can depend on them to respond to and effectively manage any emergency situation. SDS' approach to projects is to Achieve Excellence and deliver the highest standards of clinical care in the environments in which we operate, through a combination of multinational emergency response personal, local knowledge and an integrated global clinical governance, training, security, critical risk and medical supply.

## SECTION 2

# OUR CODE – KNOW IT

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Our Code, together with our Values, is part of every decision we make and guides how we act, work, communicate and evaluate our conduct.

It sets out the standards of conduct you can expect from SDS, and those we expect from you.

Our Code is widely available so everyone can understand our conduct standards.

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## WHO MUST FOLLOW OUR CODE?

### OUR PEOPLE

Includes SDS directors, executive management, employees and contractor staff (e.g. labour hire, temporary and secondees).

### OUR SUPPLIERS

Any third party that SDS engages to provide goods and/ or services, such as vendors, consultants and contractors, as well as third party representatives who interact with external parties on SDS behalf.

Those who interact with others on our behalf must follow our Code. All other Suppliers must follow this Code, or their own Code provided their standards of conduct are consistent with ours.



## OUR CODE – LIVE IT

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Through our Chief Executive Officer and Leadership Team, our Board:

- oversees SDS's culture;
- promotes ethical, responsible and lawful decision-making; and
- promotes an inclusive workplace where we hold ourselves and each other to account.

Our Code enables this and reflects what's important to us. Follow it and the law.

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### UPHOLD OUR STANDARDS OF BUSINESS CONDUCT

We respect and work in accordance with applicable laws and regulations of the countries where we operate.

Where differences exist between our Code and local laws or regulations, we apply the higher standard of conduct.

You must follow all our applicable policies, standards, procedures and processes as relevant to your work for SDS.

### MAKE GOOD DECISIONS AND AVOID ANY IMPROPER CONDUCT

Embed our Code into your everyday work and decision-making.

### UNSURE WHAT TO DO OR HAVE A QUESTION?

- **Ask for help** from your direct line leader or another SDS leader.
- Use our **Business Conduct Quick Test** outlined at Section 4.

### CONSEQUENCES FOR BREACHING OUR CODE

A breach of our Code is serious and may have significant reputational, commercial, operational and/or legal consequences.

It may result in:

- disciplinary action, including termination of employment;
- legal action (for example, SDS may sue to recover stolen company assets or money);
- SDS terminating its relationship with a supplier or other third party involved in the breach;
- misconduct being reported to law enforcement authorities; and/or
- exposing SDS and its People to significant civil and/or criminal consequences, such as fines or imprisonment for those involved.

**Speak Up and report a business conduct concern** via any of the reporting options outlined within **'Whistleblower'** at section 17.

#### **We don't tolerate retaliation.**

Never retaliate, encourage or allow others to retaliate, against someone for reporting a business conduct concern.

Our Whistleblower Procedure confirms we will support and protect you from retaliation for reporting a legitimate business conduct concern.

## BUSINESS CONDUCT QUICK TEST

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Use our Business Conduct Quick Test to make good decisions.

We are all responsible for working with integrity, respect, good judgement and within the law.

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### HOW TO MAKE GOOD DECISIONS

When faced with a difficult decision or situation:

- **PAUSE** before you act and consider how to approach the situation.
- **THINK** whether the action is consistent with our Values and our Code.
- **ASK** for help if you are unsure.

Use this Business Conduct Quick Test:



#### VALUES

Does it fit with our Values?  
Does it fit with your personal values?



#### SAFETY AND ENVIRONMENT

Could it endanger someone's safety or health, or the environment, directly or indirectly?



#### LAW AND POLICIES

Is it legal?  
Is it in line with our policies, standards and procedures?



#### MEDIA

If the story appeared in the newspaper or other media, would you feel comfortable with the decision?



#### FAMILY

Would you tell your partner, child or friend to make the same decision?

If you feel discomfort or have difficulty answering any of these questions, don't proceed and speak to someone about the matter.

### IF IT FEELS WRONG, THEN IT PROBABLY IS.

#### FIND OUT MORE

See our Whistleblower at Section 17 of this Code  
Whistleblower Policy (POL-56)  
Whistleblower Procedure (PRO-179)

SECTION 5

## EVERYONE GOING HOME SAFE AND WELL

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Nothing is more important to us than making sure everyone goes home safe and well every day.

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### HEALTH AND SAFETY

#### TOGETHER, WE BUILD TRUST AND ARE ALL RESPONSIBLE FOR:

- **Working safely and preventing workplace injuries and illnesses.**

All our People, Suppliers (which includes contractors) and visitors must be aware of and comply with our health and safety standards, procedures and practices.

All work must be well designed before commencing it. Risks must be assessed and controls implemented and verified before critical risk work commences.

Demonstrate care through displaying safety leadership.

- **Being fit for work every day.**

All our People, Suppliers (which includes contractors) and visitors must be well rested, physically and mentally fit, and not under the influence of drugs or alcohol.

We encourage you to seek professional fitness for work help if you or a colleague are having difficulties.

**Stop work and report if you consider the task unsafe and Speak Up if the health or safety of anyone else is at risk.**

#### FIND OUT MORE

Integrated Management System Manual (PRO-133)

#### EMPLOYEE WELLBEING AND SUPPORT PROGRAM (EWSP)

Use our EWSP. It is part of our commitment to health and wellbeing. Contact details for our EWSP is available in our booklet (DOC-259) via our internal document management system.

## SECTION 6

# FOSTERING INCLUSION, DIVERSITY AND EQUITY IN OUR WORKPLACE

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Our People are key to our success.

We value and strive to build inclusion, diversity and equity in our workplace where everyone is valued and can be empowered to achieve their full potential.

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### **TOGETHER, WE BUILD TRUST AND ARE ALL RESPONSIBLE FOR:**

- Being inclusive and co-operating with one another.
- Knowing what is required to do our job.
- Treating others fairly, with respect and dignity, and without discrimination based on race, gender, age, nationality, marital status, ethnic origin, social class, religion, political views, sexual orientation or disability.
- Supporting each other to Speak Up aligned with our Whistleblower Policy at Section 17.
- Considering the implications of our conduct.

**We don't tolerate bullying, harassment, discrimination, victimisation or intimidation of any kind towards others** - whether in person, via email, phone, social media or other type of behaviour that creates a hostile or intimidating work environment.

We recruit and manage our People based on merit and don't tolerate unlawful discrimination.

### **LEADERSHIP PHILOSOPHY - WHAT WE EXPECT FROM OUR LEADERS**

Our leaders are passionate about our Vision, aligned with our Mission and live by our Values. SDS leaders are the glue that holds us together and the fuel that drives us. Our success is equal to the capability and capacity of our leaders, that is why we are steadfastly discerning when we appoint them.

We don't shy away from the fact that we place great responsibility on the shoulders of our leaders. Leading within SDS is a profound and demanding endeavour that rewards the leader with an immense sense of fulfillment and achievement. Our leaders make a real difference to the world they live in.

At SDS we base our leadership on these 8 simple Principles, this is what our leaders do:

- We focus on the client
- We generate trust
- We get the basics right
- We choose simplicity and remove complexity
- We bring solutions, not problems
- We are open to new ideas / teachable and have an appetite for learning
- We develop and nurture the team
- We think like an owner

Not everyone is cut out to be a leader at SDS. Leading Mission Critical Teams in critical-risk environments requires a certain type of person. These are the attributes that we look for, encourage and help to nurture in our leaders:

- You have a bias for ACTION
- You are RESILIENT
- You are MISSION Focused
- You bring CALMNESS to chaos
- You are TENACIOUS
- You embrace OWNERSHIP and ACCOUNTABILITY
- You CHAMPION the SDS Values

It's not a one-way street. Just as we have high expectations of our leaders, our leaders have high expectations of us. We support our leaders via these commitments:

- We will train and coach you to be a High-Performance Leader.
- We will listen to you
- We will communicate clearly
- We will include you
- We will give you space to fail
- We will celebrate your wins
- We will support your growth
- We will protect your health

Leadership is our key Strategic Competitive Advantage. With Leaders who embrace this Leadership Philosophy, we will Achieve Excellence!

**Bullying** is repeated unreasonable verbal, physical, social or psychological behaviours directed towards an individual or group of people at work.

**Harassment** is an action or behaviour viewed as unwelcome, humiliating, intimidating or offensive by the recipient

**Sexual Harassment** includes unwanted or unwelcome sexual advances or obscene remarks viewed as unwelcome, humiliating, intimidating or offensive by the recipient

**Victimisation** occurs where you are hassled, treated unfairly, intimidated or punished for raising a concern about misconduct in the workplace (e. g. discrimination or harassment) or supporting someone for raising such a concern.

#### **FIND OUT MORE**

Equal Employment Opportunity, Anti-Discrimination Policy (POL-12)

Sexual Harassment Policy (POL-36)

Workplace Bullying Policy (POL-13)

#### **EMPLOYEE WELLBEING AND SUPPORT PROGRAM (EWSP)**

Contact details for our EWSP is available our booklet (DOC-259) via our internal document management system.

## RESPECTING HUMAN RIGHTS

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We celebrate the diversity, dignity and uniqueness of every individual.

At SDS, we recognise our important responsibility to respect human rights. Together, we can make a difference to improve people's lives now and for generations to come.

Not only is it the right thing to do, but it is critical to the success and integrity of our business.

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### WE EXPECT THOSE WHO WORK FOR US TO:

- create and maintain a work environment that respects human rights and is without discrimination and harassment; and
- conduct business in accordance with applicable laws and our human rights standards, including aligned with recognised international human rights, such as the:
  - UN Universal Declaration of Human Rights
  - UN Guiding Principles on Business and Human Rights
  - Voluntary Principles on Security and Human Rights

### WE ARE COMMITTED TO:

- undertaking regular human rights impact assessments on all our operations;
- conducting due diligence to identify human rights risks across our operations and supply chains;
- supporting freedom of association, providing safe and decent work, and working towards embedding living wage;
- recognising the traditional rights of Indigenous Peoples;
- engaging meaningfully with communities;
- ensuring there are accessible and safe grievance and redress channels; and

#### Freedom is a fundamental human right

We are committed to ensuring no modern slavery happens within our operations or supply chains, including no human trafficking, forced, bonded or involuntary labour, and no child labour. Our annual Modern Slavery Statement outlines our commitment to identifying and addressing any modern slavery in our operations and supply chain.

**Speak Up if you become aware of any conduct (including that of any of our Employees, a Supplier, third party or other individual) which you believe might be violating another person's human right.**

#### FIND OUT MORE

Equal Employment Opportunity, Anti-Discrimination Policy (POL-12)  
Sexual Harassment Policy (POL-36)  
Workplace Bullying Policy (POL-13)

SECTION 8

## PROTECTING PRIVACY

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We respect and protect the personal information and privacy of others.

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We collect, manage and use personal information in accordance with our Privacy Policy and applicable privacy laws.

If we need to share personal information with third parties, we take reasonable steps to ensure that they also manage the information appropriately and keep it secure.

### OUR PEOPLE MUST:

- follow our Privacy Policy and applicable standards and procedures as relevant to their role, when managing any personal information; and
- promptly inform our Privacy Officer of any incident involving unauthorised access to, disclosure of, or loss of personal information held by SDS.

**Personal information** is any information (including an opinion) about an identified or identifiable person.

SDS collects Personal Information from a range of individuals in the context of our business activities including our People; shareholders; job applicants; representatives of our Suppliers; customers; contractors; users of our website; and visitors to our offices.

### FIND OUT MORE

[Privacy Policy \(POL-21\)](#)

SECTION 9

## **BUILDING AND MAINTAINING TRUST WITH OUR COMMUNITIES**

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We seek to build, manage and maintain strong and sustainable relationships with our host communities.

We strive to make a positive difference by developing natural resources to improve people's lives now and for future generations. We help do this by:

- managing the impacts of our business; and
  - giving back through our local economic development and community-based activities and investment programs.
- 

### **TOGETHER, WE BUILD AND MAINTAIN TRUST, AND ARE ALL RESPONSIBLE FOR:**

- complying with our commitments towards our communities, including making sure our third party contractors do likewise; and
- working with our community stakeholders to identify and address concerns. We aim to do this through:
  - regular, open and honest communication;
  - understanding our impact on local communities and working with them to manage those impacts; and
  - providing access to complaint and grievance processes.

### **WORKING WITH OUR HOST COMMUNITIES**

If you work with a host community, including Indigenous Peoples, you must:

- recognise and respect their cultures, customs, lifestyles and heritage;
- ensure that your conduct always reflects positively on your own reputation and that of SDS. Take care to avoid any actual or perceived undue influence or unethical conduct;
- follow our requirements for dealing with host communities, including pre-approval requirements before proceeding with any community donation or investment; and
- consult local management or a community team representative if you have any questions, including about appropriate actions, words, customs and local practices.

#### **FIND OUT MORE**

Anti-Bribery and Corruption Policy (POL-17)

SECTION 10

## BEING ENVIRONMENTALLY RESPONSIBLE

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We are an environmentally responsible business.

We work hard to treat natural resources with care so they are available for future generations.

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### TOGETHER, WE BUILD TRUST AND ARE ALL RESPONSIBLE FOR:

- being environmentally aware;
- complying with applicable environmental laws and regulations;
- understanding the potential environmental risks and impacts of our work and minimising our footprint, including in relation to biodiversity, waste, water, tailings and emissions;
- reporting actual or potential environmental incidents; and
- making sure our relevant Suppliers (which includes contractors) respect and also work in accordance with our environmental requirements and commitments.

We meet these responsibilities by considering environmental factors through all phases of our work.

### FIND OUT MORE

Environmental Policy (POL-47)

## WORKING WITH GOVERNMENTS

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We recognise the authority of governments wherever we operate.

We always seek open, non-partisan, ethical, legal and constructive relationships with governments.

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### ALWAYS CONSULT OUR CORPORATE AFFAIRS TEAM BEFORE:

- Engaging with Government Officials on matters that have the potential for political or reputational impact. This excludes engaging with government for technical or routine business purposes.

This ensures engagement with government is consistent and aligned with our company policies. If you are authorised to provide information to governments on SDS's behalf, always ensure it is accurate and appropriate.

- Providing a written or verbal submission to government on policy, legislative reform matters or to participate in a public inquiry for or on behalf of SDS. This needs prior endorsement from our Corporate Affairs team.
- Attending any political event or activity to ensure it is appropriate, lawful and meets our high ethical standards. This includes any invitation from third parties where the event involves politicians or political party officials.

**SDS does not make political donations in cash or in-kind to any political party, politician, political party official, elected official or candidate for public office in any country.**

We actively engage in policy and legitimate business discussions with political parties, politicians, elected officials or candidates for public office that affect SDS's interests and operations.

We do this in a way that demonstrates high standards of ethics and complies with the law by attending conferences, policy workshops, round table discussions and other political events.

**You must always obtain prior approval from our Corporate Affairs and Business Integrity teams to attend any political event or activity on SDS's behalf which will incur an attendance fee or cost. This is to ensure attendance at the event, and any payment for attendance, is appropriate, lawful and meets our high ethical standards.**

If in doubt, consult your Corporate Affairs representative in the first instance.

#### Participating individually in political processes

You may individually participate in political processes provided any opinion, time or money you contribute to such processes is on your own account and you make it clear you are not representing SDS.

#### Pursuing public office in your personal capacity

You must notify your line leader prior to pursuing any public office position and apply for annual leave where any duties impact your normal working hours. You may also need to resign from your SDS role if you win your candidacy.

#### Government Official includes:

- employees or officers of any national, state, regional, local or municipal authorities, as well as from public international organisations and organisations owned or controlled by government bodies;
- politicians, political party officials and candidates;
- tribal leaders or senior members of royal families; and
- in some cases, relatives of any of the above.

#### FIND OUT MORE

Anti-Bribery and Corruption Policy (POL-17)

SECTION 12

## NO FRAUD, BRIBERY OR OTHER CORRUPT CONDUCT

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We prohibit fraud, bribery and corruption in any form.

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**Don't engage in fraud or theft in your work for or on behalf of SDS.**

**Don't offer or give bribes**, directly or indirectly (for example, through an agent or intermediary), to a Government Official or any other person.

**We also prohibit facilitation payments**, even if small or customary.

**Never accept or ask for bribes**, or any other favour, from anyone (such as a Supplier) as a reward to do your job or encourage you to act improperly.

The only exception to the above is if you are asked to give a payment or thing of value and a threat is made to your health and safety (or that of a work colleague) - in such circumstances, you may give it but must then report the event as soon as safely possible.

**Only offer, give or accept appropriate gifts, entertainment and hospitality (including meals) which have a lawful and legitimate business purpose.** Pre- approval from our CEO is required if

it will exceed the modest value thresholds set out in our Gifts Policy.

**Never give or receive anything of value if others could perceive such conduct as improper under the circumstances.**

**Always consult our Leadership Team to pre- approve and advise on high risk transactions as outlined in our Gift Policy.**

**We also prohibit other illegal conduct such as:**

- extortion (which is a criminal offence of obtaining something of value through force or threats);
- money laundering (which is the act of dealing with illegally obtained funds or making them look as though they are legitimate); and

**Bribery** or a **bribe** is the offering of **anything of value** intended to improperly influence the actions of a Government Official or other private person in performing their work duties.

A **facilitation payment** is the giving of anything of value to a Government Official to get them to perform (often to speed up) a routine and non-discretionary service which we are already entitled to.

**Government Official** includes:

- employees or officers of any national, state, regional, local or municipal authorities, as well as from public international organisations and organisations owned or controlled by government bodies;
- politicians, political party officials and candidates;
- tribal leaders or senior members of royal families; and
- in some cases, relatives of any of the above.

See the glossary for the meaning of:

**Anything of value:** **corruption**; and **fraud**

### FIND OUT MORE

Anti-Bribery and Corruption Policy (POL-17)  
Gift Policy (POL-10)

## AVOIDING CONFLICTS OF INTEREST

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We expect you to always act in the best interests of SDS and to not be in conflict with those interests.

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### IDENTIFY CONFLICTS

You have a responsibility to act honestly, to identify and then disclose a situation involving an actual, potential or perceived Conflict of Interest.

**Ask yourself** - could your conduct be perceived as creating an incentive for you, or your family, close friends or a business associate at SDS's expense?

If "YES", the conduct you are considering is likely to create a Conflict of Interest.

### AVOID CONFLICTS

At all times, whether on the job or in your personal time, nothing you do should conflict with your responsibilities to SDS.

You should **not**, for example:

- have personal investments, directly or indirectly, in companies or businesses when it might cause, or appear to cause, you to act in a way that could impact SDS.
- accept any personal benefit, directly or indirectly, from any third party who is bidding for or trying to retain SDS business.
- participate in decision-making or management of potential or existing SDS business relationships that involve your family or close friends.
- participate in the hiring or recruiting process where a candidate is a family member or close friend.
- accept employment, advisory or other affiliated roles, board seats with our **Competitors** or **Suppliers** (including contractors) when your judgement could be, or could appear to be, influenced in a way that impacts SDS.

### ALWAYS DECLARE AND RESOLVE YOUR CONFLICT

As soon as you become aware of an actual, potential or perceived Conflict of Interest:

- immediately remove yourself from any involvement in the relevant activity; and
- promptly advise, review and resolve it with your line manager before proceeding.

Conflicts of Interest can often be avoided or resolved through open and honest discussion. Ask your department head if you are unsure how to resolve the conflict.

### DOCUMENT THE OUTCOME

Provide complete and accurate information and supporting documentation, if applicable.

It is your line manager's responsibility to properly review your declaration and record the agreed resolution outcome, including if it is appropriate for you to continue with any activities or discussions involving the conflict.

**Our Suppliers are to also avoid all Conflicts of Interest** that may arise in performing work for us and in related business decisions. Our Suppliers must declare any conflict of interest to SDS, and where appropriate, obtain SDS's consent before proceeding if there is or may be a perceived conflict between their obligations to SDS and those to another party.

A **Conflict of Interest** is a situation where your role or relationship with SDS or financial or other personal considerations or interests have the potential to affect, or could have the appearance of affecting, your judgment, objectivity or independence to properly fulfil your responsibilities to SDS.

## COMPETING FAIRLY

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Competition laws prohibit anti-competitive conduct by companies and individuals.

We compete fairly, ethically and comply with applicable competition laws.

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### DON'T ENGAGE IN ANTI-COMPETITIVE CONDUCT

Be cautious if your role involves dealing or interacting with SDS Competitors or potential Competitors.

Don't engage in, be part of or act in any way which others could perceive as collusive or co-operative conduct with a Competitor, either directly or indirectly via third parties. This means, for example:

- **Not** discussing or reaching understandings with Competitors about prices (i.e. price fixing).
- **Not** discussing or reaching understandings with Competitors on which customers, suppliers or geographic territories you will each deal with (i.e. market sharing).
- **Not** sharing with Competitors any information about bid or tender processes that SDS is involved in, such as whether a bid will be submitted or any bid pricing or other commercial terms (i.e. bid rigging).
- **Not** otherwise discussing or disclosing, directly or indirectly, any Competitively Sensitive Information with Competitors.

### ALWAYS:

- Ensure information necessary to share is not for an anti-competitive aim, and if shared, is not Competitively Sensitive Information.
- Stop any discussion with a Competitor if they attempt to engage in collusive conduct or exchange Competitively Sensitive Information.
- Comply with any competition law ring-fencing protocols developed for specific transactions, joint ventures and co-operation agreements.
- **Consult with our Leadership Team:**
  - before sharing Competitively Sensitive Information with external parties or if you are unsure if a proposal or incident complies with competition law;
  - before entering into any agreements with Competitors or concluding agreements which provide for restrictive or exclusionary conduct;
  - before attending any meetings (whether face to face, by telephone or video conference), site visits or industry association events involving Competitors if you are unsure what you can or cannot say or do to mitigate competition law risk; and
  - if contacted by a competition law regulator.
- **Alert our Leadership Team immediately:**
  - of any unauthorised access to, disclosure or loss of Competitively Sensitive Information;
  - of any anti-competitive conduct involving our People or other third parties; and
  - if a Competitor attempts to engage in collusive conduct or exchange Competitively Sensitive Information.

A **Competitor** is any organisation or person that offers, or is capable of offering, the same, similar, linked or substitutable products or services as SDS.

**Competitively sensitive Information** is any non-public information concerning the current or future business operations of SDS and its related companies, which is sufficiently sensitive to reduce market uncertainty and influence the strategy or commercial decision-making of a Competitor.

This includes (but is not limited to) information on pricing, costs, margins, production volume, capacity, marketing plans, business and strategic plans, and dealings with specific customers or suppliers.

## USING SUPPLIERS WITH INTEGRITY

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We work towards effective, fair, equitable and streamlined procurement processes, including related decision-making, with our Suppliers.

We aim to only work with Suppliers who:

- have strong values and standards of conduct; and
  - share our commitment to lawful business practices because their actions can directly impact our financial performance and reputation.
- 

### ENGAGING AND MANAGING A SUPPLIER

If your role involves engaging a Supplier, you must do so in accordance with our relevant policies, standards and procedures. This includes clearly informing them of our expectations, standards and applicable requirements.

All procurement decisions should be based on best value received, taking into account the merits of price, quality, performance, history and suitability to meet SDS requirements.

In managing the performance of a Supplier, you must ensure they are assessed and appropriately monitored, including by carefully checking their invoices.

**You must hold our Suppliers accountable for any conduct inconsistent with our Code.**

### OUR EXPECTATIONS OF SUPPLIERS

Our Suppliers must comply with lawful business practices and applicable SDS policies, standards, procedures and processes, as relevant to the work they are performing for or on our behalf.

### PERFORMANCE OR MISCONDUCT CONCERNS

If you have a concern about an existing or potential Supplier's integrity or ability to perform an engagement, Speak Up so we can address any issues immediately.

Equally, our Suppliers can report a misconduct concern as outlined in our Whistleblower Policy at Section 17.

A **Supplier** is any third party that SDS engages to provide goods and/or services, such as vendors, consultants, contractors.

#### FIND OUT MORE

Anti-Bribery and Corruption Policy (POL-17)

Gifts Policy (POL-10)

Procurement Procedure (PRO-71)

## PROTECTING COMPANY ASSETS, INCLUDING INFORMATION AND DATA

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Together, we must protect our Company Assets, including Confidential Information and Intellectual Property, and use them only for their intended purpose.

We also prohibit falsifying, stealing, concealing or otherwise tampering with company information and data.

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### PROTECT COMPANY ASSETS

- You must only use Company Assets for legitimate business purposes as required by your role and for the sole benefit of SDS. Protect all assets against damage, misuse, loss or theft.

Your use, including any disposal, of Company Assets must follow applicable policies, standards and procedures.

Occasional personal use of SDS email, internet and telephone systems is permitted provided it doesn't interfere with your work duties or SDS information systems. Never take any action that undermines the integrity of our data and systems.

- Your use of Company Assets may be monitored and blocked at the discretion of SDS. Inappropriate use of Company Assets may lead to disciplinary consequences, including civil and/or criminal action.
- Any unusual or suspicious activity affecting SDS technology assets that you become aware of must be immediately notified to your line manager.
- At the end of your employment or involvement with SDS, you must return all Company Assets.

### PROTECT CONFIDENTIAL INFORMATION (CI) AND INTELLECTUAL PROPERTY (IP)

- Only use CI as required in your role. You must keep it confidential and dispose of it in accordance with our applicable policies, standards and procedures. See also Section 8 (Protecting Privacy) and our Privacy Policy.
- Protect all CI and IP used by SDS (whether it belongs to SDS or to a third party) from unauthorised use. Also take care not to disclose CI in an unauthorised way.
- Notify your line manager if you believe you have created new IP and follow applicable standards and procedures so that SDS's interest in that IP can be protected.

### ENSURE COMPLETE AND ACCURATE COMPANY INFORMATION AND DATA

- Our People must create and keep true and accurate records of all financial and non-financial company transactions and data in accordance with our policies, procedures, and applicable laws and regulations.
- All financial transactions and information (such as purchase orders, invoices, travel and expense records tax filings) must be evidenced by appropriate source documents, verified for their validity and accuracy.

See the glossary for the meaning of: **Company Assets**; **confidential information**; and **Intellectual Property**

#### FIND OUT MORE

Protecting our Proprietary Information Policy (POL-34)  
Asset Management Policy (POL-44)  
Privacy Policy (POL-21)  
Back Up Of Intellectual Property (POL-27)  
Issue of SDS Property (POL-16)

## SPEAK UP 'WHISTLEBLOWER'

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Our Whistleblower Policy & Procedure is available to everyone on our website [here](#).

We also raise awareness with our People through management communications, training programs and in other related policies, standards and procedures.

Our Executive Committee are aware of all material concerns raised under the Policy, as well as material breaches of our Code, especially those calling into question our culture.

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### TO BE FULLY INFORMED READ OUR WHISTLEBLOWER PROCEDURE (PRO-179).

It tells you the types of concerns and to whom you need to report them directly to.

#### *In brief...*

Speak Up when our Values and standards of conduct are not being followed (a "**Business Conduct Concern**"),

**Speaking Up protects everyone. If you have a Business Conduct Concern, don't ignore it.**

- For example, discrimination, bullying or harassment, fraud, bribery or corruption, misuse of company assets or a human rights violation.
- Raise the concern immediately so we can take necessary action.
- Raise your Business Conduct Concern honestly. Don't make accusations you know are false.

**Anyone can report a Business Conduct Concern.**

This extends to, for example, our employees and their relatives, our Suppliers (including their employees), customers and community members.

**Who can I report a Business Conduct Concern to?**

See the next page for the various options we make available for raising a Business Conduct Concern.

**How we protect and support you**

- We treat every report seriously, confidentially and fairly.
- SDS will not retaliate against you, and will take steps to ensure our People won't retaliate against you, for raising your Business Conduct Concern.

**Protection of identity (confidentiality)**

We will only disclose identifying details where:

- You give your consent to share that information; or
- If the disclosure is allowed or required by law (for example where the concern is raised with a lawyer for the purposes of obtaining legal advice); or
- If the concern is reported to the Australian Securities and Investments Commission (ASIC), the Australian Prudential Regulation Authority (APRA), the Australian Taxation Office (ATO) or the Australian Federal Police (AFP); or
- Where it is necessary for the effective investigation of the matter, and this is likely to lead to your identification, all reasonable steps will be taken to reduce the risk that you will be identified.

## No tolerance for retaliation

Retaliation can take many forms including threats, harassment, exclusion, intimidation, damage to person or property, victimisation, humiliation or other detrimental conduct.

You will not suffer adverse consequences for:

- refusing to act (with or if asked by others) in a breach of our Code, related SDS policies, standards, procedures or the law;
- reporting a Business Conduct Concern; or
- co-operating with a company investigation.

**Any such retaliation is a serious breach of our Code and this Policy**, and may result in disciplinary consequences including termination. Report any retaliation so we can take steps to manage it.

If someone reports to you a Business Conduct Concern, you must:

- listen, respond respectfully and promptly, and treat every concern seriously;
- protect the identity of the whistleblower (as needed); and
- escalate the concern in accordance with our procedure.

## HOW TO SPEAK UP?

**Options to report a Business Conduct Concern:**

 **Contact your line leader in the first instance**

If you are uncomfortable raising the Business Conduct Concern with your line leader, you can also report to:

 **A Whistleblower Protection Officer**

- |                                    |                            |
|------------------------------------|----------------------------|
| ▪ Director Corporate Services      | Phone Number: 1300 955 097 |
| ▪ Resource and Recruitment Officer | Phone Number: 1300 955 097 |
| ▪ Chief Executive Officer          | Phone Number: 1300 955 097 |

 **Any of the following, if necessary and as relevant to your concern:**

- Directors
- Leadership Team
- Auditor or member of an audit team conducting an audit of SDS.

## WHAT HAPPENS WHEN YOU REPORT A BUSINESS CONDUCT CONCERN?

### Can you report anonymously?

Yes.

### How does revealing your identity help us?

Providing your name and contact details will often assist in our assessing your concern. We hope you will feel comfortable to do this to assist us.

### What information will you be asked to provide?

Background and historical dates; Relevant names and information; Any relevant documents/ evidence. Please provide as much information as possible to allow us to assess and/or investigate properly.

### What happens if you report your Business Conduct Concern?

Based on the nature, urgency and severity of the concern we will acknowledge receipt of your report respectfully and within a reasonable period.

### How we investigate

In some cases, advice, support or guidance is all that we will need to resolve your concern. Where necessary, we will investigate the concern.

**Is it confidential?** The information you provide will be dealt with confidentially, if required. Measures will be put in place to protect your identity as needed. If you participate in or learn about an investigation, you must keep it confidential.

**How do we treat those implicated in a report?** We may be required to inform an implicated person if a complaint has been made against them. We will objectively and fairly assess each report and, where necessary, investigate it.

### Closing a case

Subject to confidentiality and privacy, we will update you appropriately on our assessment and the outcome. We will take necessary remediation actions.

## EXTERNAL WHISTLEBLOWING

Nothing in our Code or Whistleblowing Policy prevents you from, or requires approval for, reporting what you reasonably believe is a breach of the law to an appropriate government authority or from seeking legal advice on your rights.

### FIND OUT MORE

Whistleblower Policy (POL-56)

Whistleblower Procedure (PRO-179)

## GLOSSARY

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**Anything of value** includes cash, cash equivalents, gifts, per diems, entertainment, travel, accommodation, vouchers, meeting fees, kickbacks, commissions, political donations, community or charitable donations, scholarships, sponsorship or job opportunities.

**Bribery** or a **bribe** is the offering of **anything of value** intended to improperly influence the actions of a Government Official or other private person in performing their work duties.

**Bullying** is repeated unreasonable verbal, physical, social or psychological behaviours directed towards an individual or group of people at work.

**Company Assets** are SDS assets which exist in various forms and include physical and non-physical property, such as facilities, equipment, information technology inventory, software, data (including on personal devices and SDS systems), funds, hardware (e.g. computers, telephones and servers), technology services (e.g. internet and email), Confidential Information and Intellectual Property.

A **Competitor** is any organisation or person that offers, or is capable of offering, the same, similar, linked or substitutable products or services as SDS. Direct rivals, customers, suppliers and agents may be competitors in certain circumstances.

**Competitively Sensitive Information** is any non-public information concerning the current or future business operations of SDS which is sufficiently sensitive to reduce market uncertainty and influence the strategy or commercial decision-making of a Competitor.

This includes (but is not limited to) information on pricing, costs, margins, production volume, capacity, marketing plans, business and strategic plans, and dealings with specific customers or suppliers.

**Confidential Information ("CI")** is any information that is not in the public domain. Our Code covers CI belonging to SDS as well as CI belonging to third parties (e.g. Suppliers) that SDS has permission to use.

A **Conflict of Interest** is a situation where your role or relationship with SDS or financial or other personal considerations or interests have the potential to affect, or could have the appearance of affecting, your judgment, objectivity or independence to properly fulfil your responsibilities to SDS.

**Corruption** is dishonest conduct for private gain, typically involving those entrusted with power or authority.

A **counterparty** is any party with whom SDS conducts business, including customers, suppliers, agents, distributors, resellers, financial institutions or banks.

**Fraud** is deception resulting in financial or personal gain intended to secure an unfair or unlawful advantage.

**Government Official** includes:

- employees or officers of any national, state, regional, local or municipal authorities, as well as from public international organisations and organisations owned or controlled by government bodies;
- politicians, political party officials and candidates;
- tribal leaders or senior members of royal families; and
- in some cases, relatives of any of the above.

**Harassment** is an action or behaviour viewed as unwelcome, humiliating, intimidating or offensive by the recipient.

**Intellectual Property ("IP")** is intangible property that is the result of some creative endeavour. Examples of IP include branding and trademarks, product designs, patentable inventions (potentially including business processes), know-how and copyright materials (such as plans, drawings or documents). Our Code covers IP belonging to SDS as well as IP belonging to third parties (e.g. Suppliers) that SDS has permission to use.

**Personal information** is any information (including an opinion) about an Identified or identifiable person. SDS collects Personal Information from a range of individuals in the context of our business activities including our employees; shareholders, job applicants; representatives of our suppliers; customers; contractors; users of our website; and visitors to our offices.

**Sexual harassment** includes unwanted or unwelcome sexual advances or obscene remarks viewed as unwelcome, humiliating, intimidating or offensive by the recipient.

**SDS** means Safety Direct Solutions Pty Ltd.

A **Supplier** is any third party that SDS engages to provide goods and/or services, such as vendors, consultants, contractors as well as third party representatives who interact with external parties on SDS's behalf.

**Victimisation** occurs where you are harassed, treated unfairly, intimidated or punished for raising a concern about misconduct in the workplace (e.g. discrimination or harassment) or supporting someone for raising such a concern.



**Safety Direct Solutions Pty Ltd**

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Safety Direct Solutions RTO #: 51632