



Partisan Protective Services

Code of Conduct

10 July 2018 V 1

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This Code outlines the standards of conduct expected of all Partisan Protective Services team members when dealing with each other, clients, customers, suppliers, contractors, shareholders and anyone we interact with in our business.

Everyone

At work and work-related social situations, or any situation in which you are representing Partisan Protective Services:

- Embrace and act in accordance with our Values.
- Make truthful statements, promises or commitments that you are able to meet.
- Act in an ethical, honest, professional, and lawful manner and be accountable for your actions and decisions. Treat others as you wish to be treated and trust, support and respect our fellow team members
- Fulfil your contract of employment and undertake your duties and exercise any power given to you faithfully with care and diligence.
- Comply with all lawful directions by Partisan Protective Services and conduct yourself appropriately and in a lawful manner with all persons with which Partisan Protective Services conducts business
- Comply with any Partisan Protective Services policy that sets standards higher than those required by law.
- Learn about and comply with Partisan Protective Services policies and procedures, and all relevant laws.
- Perform your duties in a manner that minimises negative environmental, social and community impacts and maximises workplace safety.
- Role model and share your knowledge about this Code with other team members.
- Raise situations you think could be in breach of the Code with your manager.
- Encourage others to raise concerns.
- Keep the Code accessible for ongoing reference.

Supervisors

In addition to your individual responsibilities, as Supervisors, you are also required to:

- Lead by example.

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Ph: 1300 94 99 94 Website www.partisanprotective.com

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- Comply with this Code, Company policies and all laws that apply in your area of responsibility.
- Contribute to our reputation as a good corporate citizen which seeks the respect of the communities and environments in which we operate.
- Exercise fairness, courtesy, respect, consideration and sensitivity in all dealings within the workplace and with customers, suppliers and the public generally.
- Build team members' knowledge of and compliance with this Code, Company policies and all relevant laws.
- Provide an environment where team members can raise their concerns and discuss them openly without fearing or experiencing negative consequences.
- Manage behaviour that is inconsistent with this Code.
- Lead and manage team members in accordance with our Values.

Getting advice

Your line manager is your most direct source of information and assistance. In addition to your individual responsibility to learn about Partisan Protective Services policies, your line manager will be able to assist you to access any specific Partisan Protective Services policies you may wish to view. Specific policies provide detailed explanations of Partisan Protective Services standards across a range of areas and can be found in our WH&S folder. Your Operations manager will be able to clarify how this Code applies to you in a specific situation or direct you to someone who can assist such as your Human Resources representative.

Diversity and equal opportunity

Partisan Protective Services is committed to diversity and equal opportunity. I will recognise and appreciate the value of our differences, internally amongst team members and also externally amongst customers, suppliers, contractors and anyone we interact with in our work with Partisan Protective Services. We will not accept harassment, sexual harassment, discrimination, bullying or any other inappropriate workplace behaviour.

I will:

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- Treat everyone that I interact with in the course of my employment with dignity, courtesy and respect.
- Contribute positively to an environment where team members and others I interact with can work and customers can shop without the distress or interference caused by harassment, sexual harassment, discrimination or bullying.
- Not unlawfully discriminate against people in the provision of our goods and services, and in all aspects of employment including recruitment, training, promotion, remuneration and benefits and termination of employment on prohibited grounds (such as age, gender, race, disability, religion, etc).
- Not make any disparaging or untruthful remarks about other team members, customers, competitors, contractors or suppliers.

The above requirements also extend to your behaviour and activity which may occur on online forums.

Fair trading and anti-bribery

Partisan Protective Services will provide customers with the confidence that we will always be open, honest and trustworthy in all our dealings with them.

I will:

- Deal openly, honestly and fairly with clients and customers.

Partisan Protective Services will work with suppliers of goods and services in a constructive, lawful and fair manner, which abides by Partisan Protective Services policies.

I will:

- Ensure third party relationships are based on price, quality, service and reputation.
- Deal fairly and honestly with suppliers and not use undue pressure, coercion or unfair tactics.
- Not directly or indirectly offer, accept, promise or request cash or any other incentive or benefit, favourable treatment, inducement or reward in any form or engage in conduct involving money laundering, bribes, 'kick-backs',

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secret commissions, facilitation payments or other unlawful (or in breach of Partisan Protective Services policies) payments.

- Not make any political donations for or on behalf of Partisan Protective Services.
- Not make any charitable donation for or on behalf of Partisan Protective Services, without the proper prior approval.
- Report any known or suspected activity involving any form of bribery or conflict of interest.
- Maintain accurate books and records and never engage in fraud.
- Take all practical steps to ensure that agents, contractors, intermediaries or business partners do not engage in conduct on behalf of Partisan Protective Services that would contravene this Code.

Partisan Protective Services will interact with competitors in a fair and reasonable manner.

I will:

- Deal fairly with competitors and not influence or restrict their dealings.
- Not enter into any discussions or agreements with competitors regarding prices, discounts or sales.
- Not misuse our position to restrict competition in the marketplace.
- Comply with and promote all relevant competition and consumer laws.

Safety, health and wellbeing

Partisan Protective Services will provide a working and shopping environment where team members and customers are safe. Partisan Protective Services will not accept behaviour that puts at risk the safety of team members, customers, suppliers, contractors or anyone we interact with in our work with Partisan Protective Services. This includes physical and psychological violence or harm, or threats of violence or harm.

I will:

- Behave in a way that ensures my safety and the safety of others.
- I will not put the safety of others or myself at risk.
- Follow all safety requirements.
- Attend fit for work, not under the influence of alcohol or other drugs/substances.
- Not possess or traffic illegal drugs or weapons at work.
- Not smoke on Company premises except in designated areas.

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- Maintain personal presentation standards.
- Immediately report any team member putting themselves, other team members or anyone in the workplace at risk of harm or injury.
- Immediately and accurately report to a manager any injury I am involved in during the course of my employment with Partisan Protective Services.

Conflict of interest

Situations can sometimes arise where a team member has interests which conflict with those of Partisan Protective Services. For example, a conflict of interest exists where a team member makes a Partisan Protective Services business decision, or influences a decision (of a supplier, customer, contractor, another team member), that provides a personal benefit to themselves or a related third party such as a partner, relative, business or associate. Partisan Protective Services recognises there is potential for a conflict of interest in a range of situations involving team members, customers, suppliers, contractors and other parties, and will work with team members to resolve potential or actual conflicts of interest.

I will:

- Declare any actual or potential conflict of interest to my manager.
- Ensure that personal interests will not conflict with my duties and obligations to Partisan Protective Services.
- Ensure other employment does not impair my ability to perform my role for Partisan Protective Services.
- Not accept gifts from customers, agents, contractors or suppliers or any third party with whom we have business dealings or might have business dealings.
- Only accept entertainment where it is an essential part of doing business, an existing business relationship exists, and my manager has approved it.
- Never request any invitation for entertainment or hospitality and never accept any form of complimentary travel or accommodation from a third party with which Partisan Protective Services has business dealings or potential business dealings.
- Only purchase merchandise direct from suppliers when it is an approved business requirement.
- Not offer or accept a bribe or engage in fraud.

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Confidentiality of information and corporate reputation

Declare any actual or potential conflict of interest to my manager.

Information is considered confidential when it is not readily available to the public. The majority of information used throughout Partisan Protective Services is confidential. If you are in doubt, treat information as confidential. Partisan Protective Services will not accept the unauthorised disclosure of confidential information.

I will:

- Keep Partisan Protective Services information confidential except where disclosure is authorised or required by law.
- Use only my own systems log-on ID and password, and not provide them to another user.
- Use confidential information solely for authorised purposes and I will not use it inappropriately to gain an advantage for myself or someone else, or to cause detriment to Partisan Protective Services.
- Not engage in insider trading of Partisan Protective Services shares or securities.
- Not provide any Partisan Protective Services information that is not publicly known to family, friends or any other person or entity that could affect the Partisan Protective Services share price.
- Only dispose of, trade or acquire any Partisan Protective Services shares or securities in accordance with the rules of the share plan, the law and any rules governing the disposal, trade or acquisition of any other Partisan Protective Services securities.
- Refer requests for information from the media, government, community, bloggers or analysts to Corporate Affairs.
- Not use, at any time, the internet or on-line social media forums to make statements or comments or to post material that might damage Partisan Protective Services reputation or interest, or the reputation or interests of team members, customers, suppliers, contractors, competitors, or any person Partisan Protective Services has business dealings with.
- Not publish, at any time, any Partisan Protective Services confidential information to any internet or on-line social media site.
- Not post derogatory, offensive, inappropriate, hateful or threatening comments or material about a team member, customer or any person with whom Partisan Protective Services has business dealings, such as contractors and suppliers including where such comments or materials constitute bullying, harassment or discrimination of that person.

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Privacy

Partisan Protective Services is committed to ensuring the privacy of individuals and safeguarding the personal information provided by team members, potential team members, customers, suppliers, contractors and anyone else we interact with in our work with Partisan Protective Services. The business will not accept collection, use or disclose information for anything other than the purpose for which it is required.

I will:

- Respect the privacy of individuals.
- Respect information I have or know about team members, customers, suppliers, contractors and anyone else I interact with in my work with Partisan Protective Services.
- Collect, retain and disclose information appropriately and lawfully.

Company resources

Partisan Protective Services will not accept deliberate or reckless damage to, or the theft or misuse of its resources, or the resources of others who we interact with in our work with Partisan Protective Services.

Resources include: stock, money, equipment, stationery, files, data, records, computer hardware and software, intellectual property and Company work time. I will:

- Use Partisan Protective Services business resources for the purpose intended and not use these resources for personal or a third-party gain, to release confidential information or transmit illegal, objectionable or offensive material.
- Only dispose of any resources, if approved and accurately recorded.
- Abide by copyright and trademark laws, including Company logos and never publish, or cause to be published, the Company logo or trademarks of any social media site, the internet or otherwise without Partisan Protective Services express authorisation.
- Maintain accurate business records, including work attendance, merchandise and accounting, financial and expenditure records and

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business dealings, and not falsify such records or cause such records to be inaccurate or falsified.

- Only enter into agreements with external parties to the extent that I have the authority and approval to do so.
- Return all Partisan Protective Services property and any Partisan Protective Services confidential information in your possession upon cessation of employment with Partisan Protective Services.

Breaching the Code of Conduct

Partisan Protective Services treats breaches of this Code seriously.

If you breach this Code, or assist someone else to breach the Code, the breach will be investigated. If it is determined that a breach has occurred, Partisan Protective Services will address the behaviour in line with the circumstances of the individual case. This could include coaching a team member or disciplinary action, which ranges from a warning to termination of employment without notice.

There are some breaches of this Code that Target considers serious misconduct and will not tolerate. Serious breaches are likely to result in termination of employment.

Some examples are:

- Serious harassment, sexual harassment, discrimination or bullying.
- Serious safety breaches, including physical or psychological violence or threats of violence.
- Misleading or defrauding Partisan Protective Services.
- Theft from Target or another Partisan Protective Services business.
- Actions resulting in serious damage of Partisan Protective Services property.
- A serious breach of Partisan Protective Services policies and procedures or the law.
- Consuming or trafficking illegal drugs or weapons.
- Attending work under the influence of alcohol or other illegal drugs.

Reporting a breach

If you genuinely believe that there has been a breach of this Code, we want you to raise your concerns.

Team members who are concerned about conduct should raise their concerns with a manager. If the breach involves your manager, raise it with

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their manager or your Human Resources representative.

Sometimes there may be exceptional circumstances when a team member has used this process and the conduct is not rectified, or a team member believes a breach is so serious that they feel unable to raise their concerns through normal channels.

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