

BUSINESS ETHICS POLICY

Intent & Purpose

We are determined to ensure that our operations comply with our legal requirements regardless of jurisdiction or circumstances. Our Business Ethics Policy is intended to establish the standards that are reasonably designed to deter wrongdoing and promote and reinforce ethical behaviour.

Operation and Incidence

Application

Springmount Services requires the following of its people and third-party suppliers.

- Comply with all legal, regulatory, and statutory obligations including our Code of Conduct and Code of Conduct of any professional or industry body to which they may be subject to in undertaking work activities
- Commit to providing an honest and professional approach in dealing with clients
- Behave with honesty and integrity at all times
- Promote a high level of trust and confidence
- Present a personal and professional manner, appearance, and dress code when representing the Company (Refer to THE COMPANY 504 – POL - Dress Code Policy)
- Demonstrate openness and fairness in all workplace dealings
- Avoid the appearance of impropriety; no team member will accept gifts or promotional items of more than nominal value (c. \$75)
- At all times be aware of discussing work-related matters in public places, including transport, restaurants and in other public areas.
- Reported behaviour and/or actions contrary to the Code of Business Ethics are reported, these issues shall be dealt with as a disciplinary matter.

Subordinate documents

Code of Conduct

RACI

Responsible	It is the responsibility of the Executive Committee to implement, maintain and communicate this policy.
Accountable	The final authority for this policy lies with the Managing Director.
Consulted	When making changes to this policy, a consultation should be carried out with the leadership team.
Informed	All changes to this policy should be communicated to all leaders.

Breach of The Policy

Breach of this policy may be regarded as misconduct, leading to disciplinary action which may result in termination of employment or engagement. An individual may also be exposed to criminal or civil liability for a breach of relevant legislation.