



## ETHICAL CONDUCT AND SOURCING

### Objective:

**We are committed to maintaining the highest standards of business conduct and ethics including human rights and labour rights of all our workers, including workers within our supply chains.**

Our Policy is designed to help identify and mitigate human rights and labour risks that exist within our supply chain, and remedy issues where they are found.

### Risk Assessment

The table below outlines the activities associated with each risk category. Budget Workforce may, at its discretion, require an independent audit to confirm rectification of any identified breaches. The assessment is conducted via information supplied

Assessment Form.

Low	Medium	High
No reported breaches, Ethical Policy in place	No reported breaches, No Ethical Policy in place	Reported breaches

### Mitigating the Risk of Unethical Sourcing

Budget Workforce will obtain evidence from the Medium to High-risk contractors to ensure close out of breaches or lack of policies are implemented. Engaging contractors and suppliers must be risk scored Low to engage in business with Budget Workforce.

### Training

Managers and Workers will be informed of Budget Workforce's Ethical Sourcing Policy. Training and support on the conduct of risk assessments will also be provided.

### Bribery

Budget Workforce has a policy that prohibits employees or anyone acting on our behalf from providing any payment or benefit to any person or entity to improperly influence a government official or to gain an unfair business advantage.

Budget Workforce is committed to performing with integrity and acting ethically and legally in accordance with all applicable laws and regulations, including, but not limited to, anti-bribery and anti-corruption laws.

Budget Workforce staff are not permitted to give, offer, promise, accept, request or authorise a bribe, whether directly or indirectly.

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We expect the same commitment from any consultants, agents, representatives or other companies and individuals acting on our behalf ("Associates"), as well as those acting on behalf of Associates, in connection with work for Budget Workforce.

For the purposes of this Policy, a "bribe" is anything of value given, offered, promised, accepted, requested or authorised (in each case, directly or indirectly) with the intent that a person who is trusted or expected to act in good faith or with impartiality, performs that function improperly or in order to obtain or retain an advantage in the course of business.

"Corruption" is the misuse of public office or power for private gain; or misuse of private power in relation to business outside the realm of government.

Acts of bribery or corruption generally involve the undue influence of an individual in the performance of their duty, whether in the public or private sector.

### **Bribery of Government Officials**

Australia has laws that forbid making, offering or promising any payment or anything of value (directly or indirectly) to a government official when the payment is intended to influence an official act or decision to award or retain business. Under Budget Workforce' policies, "government official" is broadly interpreted and includes:

- any elected or appointed government official (e.g. a member of a ministry of health);
- any employee or person acting for or on behalf of a government official, agency, or enterprise performing a governmental function;
- any political party, candidate for public office, officer, employee, or person acting for or on behalf of a political party or candidate for public office; or
- an employee or person acting for or on behalf of a public international organisation.

"Government" is meant to include all levels and subdivisions of governments (i.e., local, regional, or national and administrative, legislative, or executive). Because this definition of "government official" is so broad, it is possible that employees or other parties could interact with a government official in the ordinary course of their business on behalf of Budget Workforce.

### **Commercial Bribery**

Bribery and corruption can also occur in non-government, business to business relationships. Australia has laws which prohibit offering, promising, giving, requesting, receiving, accepting, or agreeing to accept money or anything of value in exchange for an improper business advantage. Examples of prohibited conduct could include, but are not limited to, the provision of inappropriate gifts or hospitality, kickbacks, or investment opportunities offered to improperly induce the purchase of goods or services. Budget Workforce colleagues are not permitted to offer, give, solicit or accept bribes.

### **Fair Dealing**



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We strive to outperform our competition fairly and honestly. Advantages over our competitors are to be obtained through superior performance of our products and services, not through unethical or illegal business practices.

Acquiring proprietary information from others through improper means, possessing trade secret information that was improperly obtained, or inducing improper disclosure of confidential information from past or present employees of other companies is prohibited, even if motivated by an intention to advance our interests. If information is obtained by mistake that may constitute a trade secret or other confidential information of another business, or if you have any questions about the legality of proposed information gathering, you must consult your supervisor or the Director.

### Gifts

Business entertainment and gifts are meant to create goodwill and sound working relationships and not to gain improper advantage with customers or facilitate approvals from government officials. Unless express permission is received from a supervisor or Manager, entertainment and gifts cannot be offered, provided or accepted by any employee unless consistent with customary business practices and not:

- of greater than nominal or token value,
- in cash,
- consisting of travel or lodging,
- susceptible of being construed as a bribe or kickback or
- in violation of any laws.

Any gift that could create an obligation to the donor or recipient or influence the business relationship with the donor or recipient, should not be offered, provided or accepted.

Employees should not accept gifts or entertainment that may reasonably be deemed to affect their judgment or actions in the performance of their duties.

**Signed:**

**Harjinder Singh**  
**Managing Director**  
**Budget Workforce Pty Ltd**  
**Date: 1<sup>st</sup> February 2021**