



# **Business Ethics Policy**

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**Revision 0**

## COMPANY DETAILS

<b>COMPANY NAME</b>	<b>CBAC Pte Ltd</b>
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## INTRODUCTION

Business ethics is the study of proper business practices that allude to potentially controversial issues, such as corporate governance, insider trading, bribery, discrimination, social accountability, and fiduciary responsibilities. Business ethics involves the moral principles that guide the way a company and its employees should behave.

## PURPOSE

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To provide a guiding principles for CBAC to ethically engage with stakeholders, and avoid damage to our reputation, and/or threaten our commercial success.

## POLICY STATEMENT

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CBAC is committed to conducting our business in an ethical and professional way. We will fully support all personnel and colleagues, who carry out their tasks and activities in such a manner.

We define business ethics as ‘the code of moral principles and values that governs the behaviour of a person or a group with respect to what is right or wrong’.

To serve this end, all CBAC activities shall be governed by the following principles:

- As a fundamental guiding principle, decision-making in the company shall be informed by: (1) non-interference of the fundamental human rights of others; and, (2) equity, fairness, and impartiality.
- CBAC and its personnel shall comply with our legal obligations in Australia, and in any other country in which work is performed. Where there is a conflict between Australian law and the local law of another country, the matter shall be referred to the Board of Directors for advice and resolution.
- Company assets shall be used solely for the benefit of CBAC, and only for valid business purposes. Company assets include not only physical plant and equipment (e.g., vehicles, computers), internet access, company funds, and office supplies, but also business strategies and plans, financial data, and other information about the company.
- All accounting documentation must clearly identify the true nature of business transactions, assets, and liabilities in conformity with relevant regulatory, accounting, and legal requirements.
- No fraudulent, false, or artificial entries shall be made in any company record for any reason, nor shall permanent records be altered in any way.
- Personnel shall avoid entering into business dealings that may be considered illegal, unethical, immoral, or reflect adversely on the integrity of CBAC and/or the individual. If in any doubt, personnel must refer the matter to the Board of Directors for advice and resolution.
- Personnel are prohibited from soliciting and/or receiving, either directly or indirectly, from any person, company, or body anything of a significant value (referred to as ‘graft’, ‘gifts’, ‘kickbacks’, ‘discounts’, ‘rebates’) in connection with a transaction entered into by CBAC. Any attempt by a person, company, or body to offer such inducement must be reported to the Board of Directors. Exceptions: (1) item is of nominal value; or (2) item is primarily of an advertising or promotional nature.
- Personnel may offer or accept entertainment that is an adjunct to a business relationship in the relevant cultural context, but only if the entertainment is reasonable, occurs infrequently, and does not involve lavish expenditures.
- Personnel must disclose to the Board of Directors, as soon as they become aware, any conflicts of interest that arise between themselves and CBAC. In addition, personnel who may be working on secondment to a client must be aware of the potential for conflicts of interests of the client and those of CBAC, and disclose such conflicts to the Board of Directors.

- Personnel shall not disclose confidential or proprietary information relating to CBAC, or its employees, clients, suppliers, or sub-contractors to others outside the company without authorisation from the Board of Directors.
- Personnel who are granted access to a client's offices, files, and systems must treat all information thereby obtained as confidential, and must not divulge such information to any third party, unless authorised to do so by the client.
- While we maintain a policy of non-discrimination against political affiliation and opinion, any donation to a political party or political candidate made on behalf of CBAC must be authorised by the Board of Directors.
- A business ethics policy or code of conduct cannot cover all circumstances or anticipate every situation. As such, personnel should seek guidance from the Board of Directors if they are unsure of the ethical status of a proposed action, if an activity or undertaking is proposed that is not covered by this policy, or where a conflict with this policy may arise.

A failure to comply with the requirements of this policy, and/or to act in an ethical business manner is grounds for immediate disciplinary action up to and including summary dismissal.

We will strive to continually improve the ways in which we promote, communicate, and manage our ethical and moral obligations with our employees, clients, suppliers, sub-contractors, and the wider communities in which we operate. We will ensure that this policy is reviewed periodically, and is communicated to, and accessible by all personnel, workers, suppliers, sub-contractors, and the public.

We will not knowingly conduct business with clients, suppliers, or sub-contractors that fail to comply with our ethical standards, and hence, undermine those standards, damage our reputation, and/or threaten our commercial success.