

# Code of Ethics and Business Conduct for Policy Performance Pty Ltd

Purpose
<p>Policy Performance Pty Ltd is committed to delivering services with the highest standards of ethics, integrity and professional conduct. Our Code of Ethics and Business Conduct (Code) guides how we work, interact and make decisions across all levels of the organisation.</p>
Scope
<p>This Code applies to all employees and subcontractors associated with Policy Performance Pty Ltd.</p>
Our commitment
<p>At Policy Performance Pty Ltd, our values guide how we operate, make decisions and engage with our clients, subcontractors and communities. We are committed to:</p> <ul style="list-style-type: none"> <li>• upholding ethical decision-making in all circumstances, guided by honesty, fairness and accountability</li> <li>• adhering to all applicable laws, regulations and policies relevant to our operations</li> <li>• respecting the dignity, rights and cultural values of every individual and community we engage with</li> <li>• competing fairly, providing high-quality, value-for-money services and avoiding conduct that could damage the reputation of the company, clients and others</li> <li>• rejecting all forms of fraudulent conduct, including dishonesty, theft, deception or misrepresentation</li> <li>• zero tolerance for corruption, bribery or any improper advantage-seeking, including misuse of position or influence</li> <li>• keeping accurate, transparent financial records and acting with fiscal responsibility and integrity</li> <li>• fulfilling our contractual obligations with professionalism and integrity</li> <li>• embedding sustainability into our business practices to support long-term environmental and social wellbeing</li> <li>• safeguarding privacy and confidentiality, including personal data and all sensitive or commercial information, in line with our internal and client Privacy and Data Policies.</li> <li>• avoiding behaviour that could be perceived as seeking or granting undue favour, such as offering or accepting gifts or hospitality in exchange for personal, professional or third-party gain</li> <li>• promoting inclusivity, equity and non-discrimination, ensuring a safe and respectful environment for all</li> <li>• speaking up and reporting unethical behaviour, without fear of retaliation and supporting an open, safe environment for ethical dialogue</li> <li>• acting as responsible stewards of public and partner trust in managing public resources, confidential data and community engagement</li> <li>• disclosing any potential conflicts of interest promptly and taking appropriate steps to prevent actual conflicts from arising, in line with the Conflicts of Interest Policy.</li> </ul>

## Responsibilities

### Management

Management at Policy Performance is responsible for:

- leading by example and fostering a culture of ethics, integrity and sustainability throughout the organisation
- ensuring all policies are communicated clearly to employees, subcontractors and stakeholders
- providing necessary resources, training and support to enable all employees and subcontractors to comply with ethical and legal standards
- monitoring compliance with company policies and relevant laws and addressing any breaches promptly and fairly
- establishing clear channels for reporting unethical behaviour or concerns, ensuring protection against retaliation for whistleblowers
- regularly reviewing and updating policies to reflect evolving standards, laws and organisational priorities
- ensuring subcontractors are selected and engaged based on their alignment with the company's ethical commitments.

### Employees and Subcontractors

All employees and subcontractors must:

- understand and comply with this Code, relevant policies and applicable laws and regulations
- participate in relevant training and communication activities led by the management
- promptly report any breach or suspected breach of the Code.

## Applying this Code

Policy Performance seeks the co-operation of all employees, subcontractors and others affected by our work. This success of this Code depends on:

- the shared commitment of everyone to uphold ethical standards and comply with this Code
- effective communication and consultation between management, employees and subcontractors
- ongoing monitoring, feedback and continuous improvement of ethical practices across the organisation.

## Monitoring and review

Policy Performance will review this Code annually, in consultation with employees:

- to assess the effectiveness of this Code
- by monitoring the compliance through ongoing engagement with employees, subcontractors and other stakeholders
- by reviewing alignment with the law, regulation and government expectations (including the Commonwealth, State or Territory Supplier Code of Conduct).

## Authorised

Name: Charlie Tulloch

Position: Director, Policy Performance Pty Ltd

Signature:



Date: 1 July 2025

Date of next review: 1 July 2026