



ETHICAL BUSINESS PRACTICES

Policy Number:

Authorised by:

Policy Statement

At FPA Australia we are vigilant in adhering to the highest standards of ethical business practice. These standards embody our corporate values. We also embrace observance of these principles as a reflection of good corporate governance. Furthermore, it is of utmost importance to our company that we are not only seen to, but in fact do have a reputation of integrity, honesty and trust in all of our dealings. We believe the maintenance of our high standards and a commitment to the spirit of them plays a significant role in building strong company and business foundation, and enhanced reputation in the marketplace.

At FPA Australia we expect all our employees will respect the trust placed in them, the integrity of the positions or functions they perform, and always maintain the highest standards of ethical business practice. All business should be conducted legally, honestly and fairly, without conflict of commercial or personal interest, improper or inappropriate enrichment.

Everyone at FPA Australia is required to strictly adhere to the specific policy guidelines listed below. The obligation is both a moral and a legal one. We expect all employees will support these standards of ethical business practice and give their total commitment to them.

The policies specifically listed cannot be exhaustive of all potential situations. Employees are expected to maintain the highest standards of ethical business practice at all times in all dealings. Common sense, integrity, honesty and sound judgement should be applied in all circumstances.

1. All employees are to adhere to legal practices at all times
 - 1.1 Employees are strictly prohibited from removing any property from company premises whether belonging to the company, another staff member or some other party, without prior authorisation from the property's owner.
 - 1.2 Falsification of any records at any time is strictly prohibited. In particular, employees are strictly forbidden from falsifying, destroying, removing or altering company records, reports, data or other documentation (whatever the form in which it appears or can be reproduced) including financial, trade, product, technology and personnel information. Falsification of records for the purpose of personal enrichment of oneself or on behalf of another is strictly prohibited.



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- 1.3 Employees are strictly prohibited from possession of weapons, explosives, firearms, or any other means of destruction to person or property, within the premises of the company, or outside company premises whilst on company business.
- 1.4 Employees are strictly forbidden from assisting any other person to do or procure any of the acts listed in 1.1 – 1.3 inclusive.
- 1.5 Employees must use their best endeavours to comply with all laws at all times and be vigilant in observing these obligations. If clarification regarding obligations is required, refer to your supervisor or manager.
2. Employees are not to profit from their position with our company
 - 2.1 An employee may neither offer nor procure, nor accept or retain any value or benefit from anyone (company or individual) doing or seeking to do business with our company. We do not do business by trading favours.
 - 2.2 Not only is the policy of our company to refrain from actual value benefit, but to be diligent in ensuring our company and employees are not seen to be trading in gifts or favours. The highest standards of propriety are to be maintained.
 - 2.3 A 'value' or 'benefit' is defined as a service, compensation, favour, gift, discount, gratuity or anything of financial value or any form of special treatment.
 - 2.4 It is not unusual for such things as business luncheons or the presentation of Christmas gifts to occur in the course of business dealings. Provided these items/occasions of value or benefit are offered during the course of honest, reputable business dealings are unsolicited and of minimal value, they may be accepted.
 - 2.5 Gifts which are sent to employees, which are outside the guidelines of 2.4, are to be returned to the sender. Employees must inform their supervisor or manager about the receipt of any such gift.
 - 2.6 Employees unsure of whether or not a 'value' or 'benefit' falls within the terms of this policy should consult their immediate manager.



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- 2.7 At FPA Australia we consider the value of travel or accommodation to be outside the bounds of the type of gift which may be considered acceptable under guideline 2.4. Under no circumstances may an employee accept travel or accommodation, or reimbursement for it from anyone.
3. Employees may not undertake activities inconsistent with their employment with us
- 3.1 All employees are engaged on the basis that they are able to and do give their best endeavours to our company at all times without a conflict of external interest or employment. Commercial or business competition or conflicts of interest, or any external activity which does in fact have, or has the potential to affect or diminish the effectiveness or efficiency of an employee in the performance of their duties is not permitted.
- 3.2 Guidelines 3.1 apply to all employees, although it is recognised casual or part-time employees have the time to pursue other interests. No matter the employment classification, however, all employees must be diligent in ensuring they are able to give our company their best endeavours at all times.
- 3.3 In stating, this policy, we do not wish to intrude on employees' private activities. Our company's concern is to avoid any conflicts of interest or outside interests which may diminish the efficiency or effectiveness of job performance.
- 3.4 Any employee uncertain of any aspect of these guidelines should consult with their immediate supervisor or manager.
4. Relationships within and outside the company
- 4.1 As stated in the previous guideline, our company regards employees' personal lives as their private business. However, our company cannot be in a position where our company may be compromised or negatively affected by the relationships of employees. Personal or social relationships which do, or could give rise to the appearance of a conflict of interest with our company or the conduct of our business, are to be refrained from.



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4.2 Employees who may find themselves in potential or actual violation of this guideline should discuss the matter with their supervisor or manager. At FPA Australia we understand there may be times when relationships nonetheless develop and would look to accommodating such circumstances to the extent it is proper and possible to do so.

5. Conflict of Financial Interest

5.1 An external financial interest (or value or benefit) which is in conflict with our company's interest, or gives the appearance of being in conflict, is not permitted.

5.2 Provided there is no actual or potential conflict as described in the previous guideline or elsewhere in this policy, receiving compensation or providing services as an employee, consultant, manager or director to an individual or organisation that conducts business with FPA Australia may be allowable in certain limited circumstances. The prior written approval of FPA Australia must be obtained.

5.3 No employee may have a direct or indirect financial interest in a competitor or with anyone (person or company) doing or likely to do business with our company as a vendor.

5.4 FPA Australia never permits ownership by an employee in a company which may or does do business with, or is a competitor of FPA Australia or its subsidiaries or affiliates.

5.5 Insider trading is strictly prohibited. No non-public information obtained by employees or otherwise coming to an employee or otherwise coming to an employee by way of the employment relationship, about our company, our clients or anyone with whom we do business may be used for purposes other than the honest and diligent performance of employee duties.

5.6 The use or diverting of any company or personnel information, trade, product, program, technology or patent for personal or other gain to anyone (person or company) is strictly forbidden.



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Violation or disregard for the standards of ethical business practice or violation of this Ethical Business Practices Policy constitute grounds for termination of employment with FPA Australia. All employees should be aware that, depending on the nature of the violation, immediate dismissal may apply.

In determining the nature of disciplinary action to be taken, regard will be had to the circumstances of the policy violation and the nature and extent of any damage or harm arising from it.

Employees also have an obligation and responsibility to notify their supervisor or manager or senior management of violations of this policy as soon as they become aware of it. All employees have an obligation to uphold these principles. Violation of ethical business practices has the potential to negatively impact on our company's trading reputation or legal position.

Every employee is required to make prompt and full disclosure to their immediate supervisor of any personal circumstance that would appear to be a violation of this policy. Such disclosure would be favourably viewed by FPA Australia in determining the company's response.