

CODE OF CONDUCT

INTRODUCTION

Why do we have a code?

1. This code of conduct outlines the standard of behaviour expected of PSG Security employees and contractors. It is designed to help you understand your responsibilities and obligations, and provide guidance if you are faced with an ethical dilemma or conflict of interest in your work. The Code of Conduct incorporates our Whistleblower procedure.

What principles guide our work?

2. The conduct principles guide behaviour in PSG Security.

Impartiality: Making decisions objectively

Make decisions, advise and behave in a manner that is free of favoritism, self-interest and preference. Treat people fairly by objectively considering all relevant facts and implementing PSG Security policies and programs equitably.

Integrity: Earning and sustaining trust

Maintain trust by being honest, open and transparent in all dealings and by acting in the best interests of PSG Security and the Client. Avoid real or apparent conflicts of interest and report any improper conduct, corruption, fraud and maladministration at work.

Accountability: Taking responsibility for results

Work to clear objectives in a transparent manner. Achieve results through the best use of the PSG Security's and the Client's, where appropriate, financial and physical resources and by working effectively with people. Always anticipate and accept the consequences of actions you take or decisions you make.

Responsive Service: Demonstrating a spirit of service

Provide a relevant and timely service to clients. Seek to match services to diverse needs to the greatest extent possible. Value the views of clients, and use these views to improve service quality.

EMPLOYMENT PRINCIPLES

Merit: Choosing people for the right reasons

Select the applicant who best meets the requirements of the role. Establish and follow selection processes that support genuine contestability and the identification and objective comparison of all relevant applicant information.

Fair and Reasonable Treatment: respecting and balancing people's needs

Manage employees in a consistent manner that shows respect for human dignity and worth, and provides an environment free of intimidation and bullying. Take account of individual differences within the context of operational needs.

Equal Employment Opportunity: Providing a fair go for all

Aim to employ a diverse workforce by making employment decisions that are free of extraneous considerations such as age, gender, ethnicity, seniority or affiliation and by providing a workplace that is free from discrimination and harassment.

Avenue of Redress: Resolving issues fairly

Provide readily accessible grievance and dispute resolution processes that ensure fairness and give confidence that appropriate action will be taken where a problem is identified. Protect employees from negative consequences as a result of accessing formal redress processes.

3. Become familiar and act in accord with this code and its principles.
4. A code of conduct cannot cover every situation. If you are unsure of the appropriate action to take in a particular situation, discuss the matter with your manager or colleagues.

PERSONAL AND PROFESSIONAL BEHAVIOUR

How should I deliver services?

5. Achieve value for money, and avoid waste and extravagance in the use of PSG Security resources. If possible, identify improvements to systems and procedures to achieve optimal effectiveness, efficiency and responsiveness.
6. Client's expectations change. Seek their feedback on the services you provide and listen and respond to their concerns.

How should I manage staff?

7. Provide a safe, encouraging and supportive environment that recognizes and values employee diversity, abilities and contributions. Give employees a clear sense of direction and purpose, and model the behaviours you expect of them.
8. Set realistic goals, timelines and workloads, and provide adequate resources to complete work. Trust employees to manage their work autonomously but also provide them with support when needed. Address any performance issues directly and confidentially with the employees concerned.
9. Treat employees fairly and consistently when making selection decisions, allocating meaningful work, assessing performance and providing development opportunities. Consult genuinely with them on any proposed changes to the workplace that affect them and adhere to industrial and legal obligations.
10. Understand and respond to employee legitimate needs and concerns. Encourage work arrangements that enable them to achieve a work-life balance.

How should I interact with colleagues?

11. Work co-operatively with colleagues, support and learn from each other and accept differences in personal style.
12. Respect and seek when necessary, the professional opinions of colleagues in their area of competence, and acknowledge their contribution.

What is expected of me?

13. Treat all people with whom you have contact in the course of your work fairly, and with courtesy and sensitivity. Be open, honest and transparent when making decisions or providing any advice or service. Provide information to a person whom is entitled, promptly and in an easily understood form. Make sure it is accurate, complete and up to date.
14. Perform your duties diligently, impartially and responsively, to the best of your ability. Whenever possible be absent from work only with prior agreement of your supervisor. Inform your supervisor or manager of any unexpected absences as soon as possible.
15. Observe relevant occupational health and safety requirements, and act to remove or bring to the attention of your supervisor or manager any situation, which is, or may be, a health or safety hazard.
16. Alcohol and drugs: Use of illicit drugs is a criminal act. PSG Security will not tolerate this activity by its employees. You have an occupational health and safety obligation to yourself, fellow workers, the client and the public to be alcohol and drug free. If you are affected by alcohol or other drug, you are not to attend at your workplace. This also applies when you are adversely affected by prescribed medication.
17. Absenteeism due to over indulgence in alcohol or the misuse of any lawfully available drug is unacceptable and is an imposition on your colleagues. You must therefore be mindful of this and moderate any such consumption.

Who is protected from discrimination?

18. Victorian and Commonwealth Equal Employment Opportunity and anti-discrimination legislation protect people from discrimination on the grounds of their sex; gender identity; sexual orientation; lawful sexual activity; marital, parental or carer status; pregnancy; breastfeeding; age; physical features; impairment; race; political or religious belief or activity; and industrial activity.
19. You must not discriminate against, harass or bully anyone, particularly those people over whom you have authority or those who are vulnerable. Material that is fraudulent, harassing, embarrassing, sexually explicit, profane, obscene, intimidating, defamatory or

otherwise unlawful or inappropriate must not be sent by email or other forms of electronic communication or displayed or stored on computer.

What should I do if I am charged with a criminal offence?

20. Immediately inform your manager if you are charged with a criminal offence punishable by imprisonment or, if found guilty, would significantly affect your ability to perform your work; for example a charge of drink driving if you drive a vehicle in the normal course of your work. Inform your manager of any criminal offence of which you have been found guilty before or during your employment with PSG Security.

How should I handle company resources?

21. Use your employer's facilities and equipment including computers, email, internet access and mobile phones for approved purposes only unless you have received permission in writing from PSG Security to use the resources privately. This private use may have been granted to enable you to better manage the balance between your work and private communications. It will not have been granted to conduct a commercial business.
22. There are several types of intellectual property or, in other words, ownership of information, including copyright, patents, trade marks, trade secrets, and design rights. Copyright covers the expression of ideas such as in writing, music and pictures. PSG Security retains the copyright of work produced by you during your employment. You retain the copyright of the work only if approved by your employer, or if you can demonstrate that you did not use your employer's time, name, information or resources producing the work.
- 22 (a) You must respect the intellectual property of others including business information and trade secrets (e.g., computer systems, software, and related knowhow) and patents, trademarks and service marks, trade dress, and copyrights. Do not directly or indirectly solicit, obtain, or use trade-secret information belonging to others from job applicants, new or existing company employees, independent contractors, or agents, original equipment manufacturers, suppliers, vendors, customers, or other third parties. If you become aware that any company employee, independent contractor, or agent may be using or discussing trade secrets of his or her former employer or another third party in his or her work for the company, you must consult with company management immediately.

How should I report unethical behaviour?

23. Comply promptly with all lawful and reasonable directions you are given. If you have grounds for complaint arising out of such directions, whether ethical or otherwise, you should discuss and attempt to resolve the matter with your manager. If you are still dissatisfied, you may lodge a personal grievance with PSG Security to have the matter resolved. You must continue to carry out any lawful and reasonable directions that you may be given until the matter is resolved.

24. Report any unethical behaviour or wrongdoing by another employee to an appropriate manager. This may include behaviour that you believe violates any law, rule or regulation or represents corrupt conduct, substantial mismanagement of company resources, or is a danger to health or safety or to the environment.

25. You will be protected against reprisals for reporting unethical behaviour or wrongdoing providing that your claim is based in a reasonable belief and you have reported the matter to the appropriate person. This may be the Director, Security Manager or supervisor.

How should I treat personal, client and customer information?

26. Respect privacy and become familiar with privacy legislation. Collect, use and disclose only personal, client and customer information that is necessary for the performance of your work or required by law. For sensitive information such as racial or ethnic origin, political views, religious beliefs, sexual preferences or criminal record, first seek the consent of the individuals concerned. Make sure that the information is accurate, complete and up to date. You must maintain the confidentiality of professional secrets and other non-public information you may receive in the course of the company's business relationship with Louis Vuitton.

27. Take reasonable steps to protect personal information from misuse and loss, and from unauthorized access, modification or disclosure. Advise people that they have a right to access their personal information and seek corrections to it.

Can I accept gifts and favours?

28. You should not seek or accept favours or gifts for services performed in connection with your employment. Included in this category are gifts in kind, such as free accommodation or travel or entertainment vouchers whether for you or members of your

- family. The general principle is that you should not seek or accept favours or gifts from anyone who could benefit by influencing you.
29. Immediately report to the managing director any circumstances where an offer of a benefit or gift is made, regardless of whether it is accepted or not, if you feel that such circumstances involve an attempt to induce favourable treatment.
30. It is expected, however, that token gifts in the nature of souvenirs, mementos or symbolic items of low material value may be accepted in the circumstances approved by the managing director.

How should I handle financial matters?

31. Ensure that in financial matters, including the handling of monies, there is full accountability in relation to any advice or transaction in which you may be involved.
32. If you are a corporate credit cardholder, comply with any limits set by PSG Security on the value or types of purchases that may be made by you. Never use the credit card for private purchases, cash withdrawals for expenses that have or will be claimed by any form of allowance. Substantiate all purchases and immediately report any loss, theft or misuse of the credit card.

What are my responsibilities in regards to business integrity?

33. Prohibition of money-laundering: Money-laundering can occur where an action is taken to mask the true origin of money or assets that are connected to criminal activity. We require you to commit to taking all appropriate measures to prevent the company's operations from being used as vehicles for money-laundering.
34. Legal requirements: You are required to act in full compliance with local, national and international laws in the conduct of your work on behalf of the company.
35. Prohibition of all forms of corruption: PSG Security applies a zero-tolerance policy concerning corruption and trading in influence. You are required to respect all applicable laws concerning corruption and to take appropriate measures to prevent, detect and sanction any corruption or trading in influence, directly or indirectly, across the scope of your activities.

36. Respect of competition: You must comply with Australian competition law as it applies to you and PSG Security. This includes not entering into concerted practices or unlawful agreements with our competitors.

37. Prevention of insider trading: You are required to comply with all applicable laws and legislation concerning insider trading and to refrain from selling or buying shares in LVMH – Moët Hennessy Louis Vuitton SE, or any linked derivative financial instruments, based on inside information, either directly or indirectly.

38. Fraud: You are required to comply with the law at all times. Behaving in a dishonest or fraudulent manner constitutes serious misconduct and you may be subject to disciplinary action. Matters amounting to criminal offences will be referred to the police.

39. Truthfulness in marketing and advertising: Australian companies are prohibited by law from engaging in misleading or deceptive conduct. Any marketing or advertising materials that you create or approve must be truthful in order to comply with Australian Consumer Law.

40. Responsible & Accountable Resources

Position	Primary Responsibility
Director	Ensure that the company's business activities comply with the Code of Conduct and Whistleblower procedure
Customer Service Manager	<ul style="list-style-type: none">• Delivery awareness training in the Code of Conduct

41. Measurement and Verification

41.1 Verification

The purpose of the verification is to determine that the requirements of this section are functioning as designed. The table below contains a summary of verification requirements.

Process Step	Verification
Code of Conduct Awareness	Code is provided to employees at induction & awareness raised during tool box talks

9.2 Measurement

The table below contains a summary of measurement requirements.

Process Step	Measurement
Compliance with the Code	Number of training sessions in which awareness of the Code is raised
Compliance with the Code	Number of complaints alleging breaches of the Code
Compliance with the Code	Number of findings of non-compliance from self assessments
Compliance with the law	Number of disciplinary actions taken against PSG by a regulator

Whistleblower Procedure

1.0 Policy Statement

PSG Security's Code of Conduct and our policies have been created to ensure high standards of conduct and ethical behaviour in all our undertakings as an organisation. The Whistleblower Procedure has been adopted to ensure that people can raise concerns raising actual or suspected contravention of our ethical and legal standards without fear of reprisal or feeling threatened in the process.

The procedure aims to:

1. Encourage people to report and issue if they genuinely believe someone has contravened our Code of Conduct, policies or the law; and
2. Outline how we will deal with serious misconduct or unethical behavior.

2.0 Actions

All employees are encouraged to report any behaviour that they believe may contravene PSG Security's Code of Conduct, policies and procedures or the law.

2.1 What sort of concerns should be reported?

1. Conduct or practices which are illegal or breach any law;
2. Corrupt activities;
3. Theft, fraud or misappropriation of funds;
4. Serious harm to public health, safety or environment or the health and safety of any employee; or
5. Any action taken against, or harm suffered by an employee as a result of making a report under this policy.

2.2 Who can make a report?

Any one including an employee, a client or a member of the public can make a report where they genuinely believe that PSG Security, an employee or staff member or a contractor of PSG Security is involved in unethical or unlawful behavior.

2.3 Who can you talk to?

If you become aware of any behavior that you believe breaches PSG Security's Code of Conduct, policies and procedures or the law then you should:

- Take the matter up with your immediate supervisor or manager
- Report the matter to the Customer Service Manager
- Report the matter to the Director

2.4 What happens after a report is made?

PSG Security will investigate all reported concerns and where appropriate in the circumstances, will provide feedback to you regarding the investigation's outcome.

In accordance with our privacy obligations, your identity and the fact you have made a report and the contents of the report will be kept confidential and no details of your participation in the process will be included in your personnel file or performance review. The report will not be disclosed to anyone except those who are actively involved in investigating the matters raised in the report.

2.5 What happens to you as a Whistleblower?

You will not be discriminated against or disadvantaged in your employment with PSG Security for making a genuine report in accordance with this policy, nor will you receive reprisals due to your actions in making a report. PSG Security will take reasonable steps to ensure that adequate and appropriate protection is being provided for those who, in good faith, make a report. This protection applies if the matter is proven or not, regardless of whether it is reported to an external authority.