



Complex::Global

CODE OF ETHICS

THE PRINCIPLES BY WHICH WE OPERATE

VERSION 1.2



Everything we do in ComplexGlobal is based on our guiding belief that we treat people fairly and ethically and that we manage risk responsibly. As part of assisting our clients we help put in place all the necessary measures to ensure that clients are fulfilling their responsibilities to safeguard their organisation and keep it secure. Those responsibilities include compliance and ethics. Our advice to our clients and our dealings with our stakeholders will always be objective - with no geographic or political bias - and we will tell them the truth (however unpalatable it may be at times). In turn, ComplexGlobal will never compromise on its own commitment to act ethically and with integrity.

Success demands that all ComplexGlobal employees and stakeholders are required to comply with the laws and regulations of the countries in which they operate. However, legal compliance is only the starting point. The long-term sustainability of our business depends on our ability to maintain the highest standards of personal and collective integrity, often in difficult circumstances. Part of our extensive vetting procedure for suppliers, vendors, consultants and freelancers aids in the fact that those same standards we champion internally are expected with everyone under our control.

Scope

This policy applies to all employees, suppliers, consultants, contractors, freelancers, vendors and associated stakeholders (including the Group Board of Directors) in companies in the ComplexGlobal Group ("ComplexGlobal" or the "Company").

Associated Documents

This policy must be read in conjunction with the following:

- Human Rights Policy
- Corporate Social Responsibility Policy
- Modern Slavery Policy
- Anti Bribery, Corruption & Anti Fraud Policy
- Whistleblower Policy

Our Ethical Commitment

Ethics are not an optional extra or something we adopt to make ourselves feel good. They define how we do what we do. Every day we are asked to help clients in controversial, dangerous and morally complex situations. Applying ethics in these circumstances is often difficult, but it is essential. Guided by an ethical code and confident in our own innate integrity, we have the opportunity to help our clients do business in the most challenging circumstances. Making us proud of what we do is always more important than short-term financial gain.

Confidentiality

ComplexGlobal will not reveal the identity of any Risk, Strategy, Emergency Operations or any other client without their consent.

All ComplexGlobal documentation and client documents entrusted to the company must be handled securely and remain confidential. Any breach, or suspected loss, must be reported to the Client Manager, Project Manager or Senior Director immediately.

Respect & Discrimination

Everyone we work with (both internal and external) should respect their colleagues. We won't allow any kind of discriminatory behaviour, harassment or victimisation. Employees & Stakeholders should conform with our equal opportunity policy in all aspects of their work, from recruitment and performance evaluation to interpersonal relations.

INTEGRITY
ALWAYS

Business Integrity

Business integrity goes beyond compliance with the law, and involves the application of our core values. ComplexGlobal does not pay bribes directly or indirectly and does not engage in any acts of corruption including the facilitation of tax evasion within our business relationships. ComplexGlobal internal and external stakeholders are expected to use their judgement not just to avoid malpractice but to promote good practice in accordance with the company's commitment to high standards of integrity.

Conflicts of Interest

ComplexGlobal staff, consultants and freelancers must avoid situations or transactions in which their personal interests could conflict or might be seen to be in conflict of those of ComplexGlobal. This includes: acting on any client information gained through their employment with the company for personal gain; passing such information to a third party; or acting in any way that could be construed as insider trading.

Conflicts of interest can arise if individuals have a personal interest in business dealings involving ComplexGlobal. Personal interest can be direct or indirect, and refers not only to personal interests but to those of family members and friends. If there is a potential for conflict, the interests of ComplexGlobal and the applicable project must take priority. ComplexGlobal staff must disclose any personal conflict of interest or perceived conflict to their direct manager. (For company conflicts of interest see Conflicts of Interest Policy.)

Human Rights

ComplexGlobal respects the full range of human rights. The company and all its employees have accountability to ensure a working environment in which everyone is treated with respect and dignity. The company recognises that protecting the environment supports the human right to live in a healthy and sustainable environment.

ComplexGlobal supports the Universal Declaration of Human Rights, and our employees are never to be complicit in human rights abuses. ComplexGlobal is guided by the UN Guiding Principles on Business and Human Rights and the Voluntary Principles on Security and Human Rights. ComplexGlobal is a participant in the UN Global Compact.

Political Activity

As a corporate body, ComplexGlobal has a policy of strict political neutrality: we do not make donations to any political parties, organisations, or individuals engaged in politics. However, ComplexGlobal will co-operate with governments and other official bodies in the development of strategy and project delivery that may affect our legitimate business interests, or where we have specialist expertise. Where we produce content & opinion via our ideas & intelligence platform, we endeavour to be balanced & fair at all times. ComplexGlobal employees are entitled to their own political views and activities, but they may not use company resources to promote or associate their views with those of the company.

Business Relationships

ComplexGlobal will take account of ethical and reputational issues, as well as legal compliance, when deciding whether to work with particular clients or take on new assignments.

We expect our suppliers, subcontractors, representatives and joint venture partners to adhere to integrity principles that are consistent with our own.

Anti Bribery, Fraud & Corruption

ComplexGlobal takes a zero-tolerance approach to bribery, fraud and corruption and is committed to acting professionally, fairly and with integrity in all its business dealings and relationships wherever it operates. We are committed to implementing and enforcing effective systems to counter bribery. We have conducted a Risk Assessment exercise considering the nature and extent of the potential risks of bribery faced by the ComplexGlobal, taking into account all interactions ComplexGlobal has with third parties. We will continue to monitor our overall risk profile.

Authority to Act

ComplexGlobal requires its employees, suppliers, contractors and freelancers to abide by this code in all circumstances. The company takes breaches of the code very seriously. Stakeholders who fail to abide by the code may face disciplinary action, including dismissal.

Employees should report any breach, or suspected breach, of this policy. They will not be penalised for reporting genuine concerns that prove to be unfounded. Please refer to Company Whistleblowing Policy for further details.

Senior management will give full backing to any staff or stakeholders who find themselves in difficult situations, or who fail to win business, as a result of abiding by the code.



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