

FAIR BUSINESS COMMITMENTS

COMMITMENT STATEMENT

At Insentra, we hold ourselves to the highest ethical standards, and our commitment to responsible business conduct is unwavering. Our Fair Business Commitments serve as a testament to our dedication to ethical principles that guide our every action. These commitments encompass critical aspects of our operations, including conflict of interest, fraud prevention, anti-competitive practices and responsible marketing. We believe that fostering a culture of integrity, transparency and accountability is essential not only for our success but also for maintaining the trust and confidence of our clients, partners and stakeholders.

Both our VP, Global Operations, Peter Brownsdon, and our Head of People and Vibe, Tania Ilias, play key roles in our ethics management framework. Whether ethical concerns emerge within our organisation or from external sources, the Insentra team is proficient in making decisions that align with the principles outlined in this Fair Business Commitments document, as well as our established policies.

These Fair Business Commitments extend to all crew members, regardless of employment type, making it mandatory for everyone to adhere to these principles. Failure to comply with these commitments may result in severe consequences, including termination and legal actions when applicable.

FAIR BUSINESS OBLIGATIONS

CONFLICT OF INTEREST:

- a. Crew members are prohibited from engaging in activities that could compromise their objectivity, impartiality, or loyalty to Insentra; and
- b. All crew members must promptly disclose any actual or potential conflicts of interest, which may arise from personal relationships, financial interests, or external affiliations,
- c. Each disclosed conflict will be evaluated on a case-by-case basis to determine its significance and potential impact on our organisation,
- d. Appropriate actions will be taken to address and resolve conflicts of interest, which may include recusal from certain activities, divestment of financial interests, or other measures deemed necessary,
- e. We will maintain thorough records of conflict disclosures, evaluations and resolutions, ensuring transparency and accountability.

FRAUD:

- a. All crew members are strictly prohibited from engaging in fraudulent activities, including but not limited to misrepresentation, forgery, embezzlement, or deceptive financial practices; and
- b. We maintain systems to promptly detect and investigate any suspicious activity, transactions, or behaviour,
- c. Crew members are required to report any suspected fraudulent activities immediately to their supervisors or the designated compliance officer,
- d. Upon receiving a fraud report, we will conduct thorough and impartial investigations, involving appropriate authorities when necessary,
- e. We will take decisive action to address confirmed fraud incidents, which may include disciplinary measures, legal action and recovery of losses,
- f. We maintain comprehensive records of fraud prevention efforts, investigations and resolutions, ensuring transparency and accountability.

ANTI-BRIBERY AND CORRUPTION:

- a) Crew members must never offer, promise, give, request, or accept a bribe or other improper benefit intended to influence a business or government decision, whether in Australia or overseas;
- b) In Australia, this commitment reflects our obligations under the Criminal Code (Cth), including the offence of failing to prevent foreign bribery committed by an associate, meaning an employee, agent, contractor, or other service provider acting on Insentra's behalf, for Insentra's profit or gain;
- c) Where Insentra operates or engages associates in other jurisdictions, we apply an equivalent standard consistent with local anti-bribery laws, including the Bribery Act 2010 in the United Kingdom and the Foreign Corrupt Practices Act in the United States;
- d) We apply due diligence, proportionate to the nature, scale and geographic reach of the engagement, when appointing agents, contractors and other third parties who act on Insentra's behalf;
- e) Facilitation payments are not permitted;
- f) Crew members must report any suspected bribery or corruption promptly to their supervisor, the designated compliance officer, or through our Whistleblower Policy; and
- g) We will maintain records of anti-bribery training, due diligence and any reported concerns and their resolution, ensuring transparency and accountability.

ANTI-COMPETITIVE PRACTICES:

- a. All crew members must adhere to fair competition principles and avoid anti-competitive practices, including price-fixing, bid-rigging, market allocation, or abuse of market dominance; and
- b. All crew members are expected to comply fully with competition laws and regulations, both domestically and internationally, relevant to our industry and operations,

- c. Crew members are required to report any potential violations of antitrust laws promptly,
- d. Reported concerns will be thoroughly investigated and appropriate remedial actions will be taken in cases of non-compliance with anti-competitive laws,
- e. We will maintain comprehensive records of training, compliance efforts, investigations and resolutions, ensuring transparency and accountability,

RESPONSIBLE MARKETING:

- a. Our marketing activities will comply with all relevant laws, industry standards and ethical guidelines; and
- b. We will provide honest and accurate information in all marketing materials, respecting the trust our customers place in our products and services,
- c. We will clearly and openly communicate details about our products, pricing and terms, ensuring customers have the information they need to make informed choices,
- d. We will not engage in misleading, offensive, or harmful advertising practices, respecting cultural sensitivities and avoiding content that may be considered discriminatory or inappropriate,
- e. We prioritise the privacy and data protection of our customers, adhering to applicable laws and regulations and obtaining consent when collecting personal information.

CONCLUSION:

We are committed to ethical business practices and responsible conduct. Our Fair Business Commitments emphasise integrity, transparency and accountability in every aspect of our operations. These commitments extend to all crew members and are mandatory, with severe consequences for non-compliance. Insentra's dedication to conflict of interest management, fraud prevention, fair competition and responsible marketing reflects our unwavering commitment to ethical standards and maintaining the trust of clients, partners and stakeholders.

We take pride in our commitment to ethical business practices and are pleased to report that we have not been involved in any legal proceedings related to such matters. Insentra is dedicated to upholding fair business practices and maintaining a high standard of integrity in all our business operations.

For detailed insights into our approach and policies regarding ethical business conduct, we encourage you to consult our publicly accessible business policies. These documents provide comprehensive information on our guidelines and procedures for conducting business in an ethical and transparent manner.

Peter Brownsdon,

VP, Global Operations

On behalf of Insentra

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