

## **FINANCIAL INTEGRITY POLICY**

**Financial integrity in all dealings is considered to be a key guiding principle of the way DeltaSBD and its employees conduct business.**

*To achieve this policy the following will apply:*

- *If an employee becomes aware of any non compliance with this code, the employee must report this non compliance to their General Manager or Company Secretary. Failure to do so will be considered a violation of this policy*
- *Financial inducements: DeltaSBD does not countenance the making of or accepting payments, payments in kind (gifts, favours, etc) or any other financial benefit, whether direct or indirect, to influence individuals to award business to DeltaSBD or to make business decision in DeltaSBD's or an individual's favour.*
- *Gifts: Employees must exercise the utmost care about giving and receiving business related gifts. This applies to direct payments and payments in kind including the provision of goods and services, personal favours and entertainment (e.g. meals, travel, etc)*
- *Conflict of interest:*
  - *Employees should not engage in activities or hold or trade assets that involve or could involve a conflict between their personal interests and the interests of DeltaSBD. Such circumstances could compromise or appear to compromise the employee's ability to make impartial business decisions.*
  - *Neither employees nor their immediate family members should have interests or investment in a competitor, customer or supplier of DeltaSBD that would create a conflict of interest. Merely holding shares would not normally lead to a conflict. However conflicts would arise if, for example, an employee had shares in a family company that was a supplier to DeltaSBD and the employee was able to influence decision making to award the contract to that company.*
  - *DeltaSBD shareholders should not engage in activities or hold or trade assets that involve or could involve a conflict between their personal interests and the interests of DeltaSBD or DeltaSBD clients*

This policy is applicable to all employees and contractors, employees' and contractors immediate family members and by extension to those external personnel or organisations who have business dealings with DeltaSBD (clients, suppliers, service providers, etc.).



Managing Director, DeltaSBD