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Business Ethics Policy

Business integrity is the quality of being honest and having strong moral principles. A business that holds itself to consistent moral and ethical standards earns the respect of its peers and the trust of its clients. Reinforced by a robust code of ethics, business integrity can be achieved in the application and enforcement of a set of guiding principles governing the actions of the company, its staff and business partners.

Aspen Medical has a policy that outlines its approach to business integrity in two parts: a **Code of Ethics** and a **Code of Conduct**. This policy applies to Aspen Medical and all of its subsidiaries and affiliates.

Our **Code of Ethics** outlines the ethical principles of Aspen Medical and its staff, representing the aspirations of the company at the business level. Our **Code of Conduct** translates these principles into practical guidance that empowers Aspen Medical, its staff, its business partners and their employees to realise these aspirations.

Our **Business Ethics Policy** – the combination of these two codes – has been developed to reinforce our commitment to honest and truthfulness and for the practical purpose of protecting Aspen Medical, its staff and business partners from **acts of corruption, modern slavery (slavery, servitude, forced or compulsory labour, bonded labour) or human trafficking** and the potential criminal liabilities. Specifically, it recognises the responsibilities of Aspen Medical under the *Criminal Code Act 1995* and its responsibilities in accordance with the relevant laws, statutes and codes applicable in the countries in which we operate. Aspen Medical will amend this code as and when necessary to reflect changes in national legislation, international agreements etc.

As part of our commitment to achieving the principles laid down in our Code of Ethics, Aspen Medical has assigned a Board Director responsible for compliance with our Code of Conduct on all projects undertaken by the company. Aspen Medical’s Managing Director/CEO and Board Director responsible for Business Compliance and Ethics, is charged specifically with ensuring the company maintains its commitment to combat corruption, modern slavery and human trafficking, and continues to enforce a zero-tolerance approach to non-compliance.

Code of Ethics

In all our endeavours, Aspen Medical and its staff pledge that we will:-

Accept the responsibilities of our Profession...

- At all times uphold the dignity, standing and reputation of our Profession, “leading by example” as advocates of good governance and strong moral/ethical codes of practice;
- Act with impartiality, and in the legitimate interests of our client(s) at all times when providing professional advice, judgement or decision;
- Apply due skill, care and technical diligence in services rendered to our client(s), imparting knowledge at levels consistent with technological progress, changes to legislation, multilateral agreements on aid and sustainable development etc.;
- Disclose any conflict of interest, potential conflict of interest or future involvement that may potentially create a conflict of interest;
- Recognise that many of the countries and communities we work in are in need of our help, seeking solutions that are compatible with the Sustainable Development Goals (SDGs) and the principles of economic, social and environmental sustainability;
- Advocate and adhere to core labour standards as outlined in the International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work (1998), seeking to eliminate forced, compulsory and child labour, and protect the rights of the individual;
- Advocate and adhere to the core standards as outlined in the *Criminal Code Act 1995* seeking to prevent slavery and human trafficking within our supply chains and our own business; and
- Perform all services with integrity, and conduct ourselves with the professionalism expected of a company with our international standing, reputation and experience.

Promote transparency and fairness in Procurement...

- Advocate the concept of "selection by ability" for individuals, seeking to eliminate discrimination based on gender, age, race, political, social or cultural backgrounds;
- Advocate the concept of “selection by ability” for companies and organisations, adhering to the principles of fair and transparent procurement throughout the tendering process;
- Refrain from bidding for and/or performing any service unless judged competent to do so;
- Neither wilfully attempt, nor otherwise sanction attempts to influence the decision of any tendering body through deliberate misrepresentation of ability, or other acts of corruption;
- Neither carelessly nor intentionally do anything to injure the reputation of a third-party, nor attempt to prejudice the appointment of rival individual/company through negative campaigning; and
- Engender a sense of trust and respect with all consultants and companies associated with Aspen Medical in mutual appreciation of our professionalism, and of our duty to the client.

Adopt a rigorous stance on corruption...

- Promote a “zero tolerance” approach to all forms of corruption;
- Ensure continuing compliance with the *Criminal Code Act 1995* and any relevant national legislation governing the operations and actions of companies\’s/individuals where we work;
- Perform appropriate due diligence on all potential partners, and refuse to associate with any company, or employ any individual suspected of corrupt behaviour/practice;
- Ensure all staff, contractors and business partners are (i) regularly reminded of our strict policy on corruption, and (ii) agree, by contract, to adhere to our “Code of Conduct” when working on opportunities and projects with Aspen Medical;
- Provide context-appropriate anti-corruption training to all staff (including Aspen Medical staff, independent consultants, and consultants’ and contractors’ staff where appropriate) to reinforce the responsibilities incumbent upon them as representatives of Aspen Medical;
- Maintain and review “whistle-blowing” procedures for the reporting of observed acts of corruption/bribery/fraud/extortion, and communicate these procedures to all Aspen Medical staff, independent consultants, and consultants’ and contractors’ staff;
- Immediately report to the relevant authority any known act of corruption, fraud or bribery committed by its staff, contractors, partnering companies or any third-party agent in the course of their commission on any lead, bid or project;
- Suspend any employee suspected of committing a corrupt offence, subsequently terminating their contract should any later investigation find they have acted in direct contravention of our “Code of Conduct”;
- Cooperate fully with any legitimately constituted investigative body which may conduct any inquiry into the administration of our business; and
- Ensure that all confidentiality of rates and contract documents, financial details and account payments are not disclosed or discussed with any parties except parties that are specifically authorised to do so.

Adopt a rigorous stance on modern slavery and human trafficking...

- Promote a “zero tolerance” approach to all forms of modern slavery and human trafficking;
- Ensure continuing compliance with the *Criminal Code Act 1995* and any relevant national legislation governing the operations and actions of companies/individuals in the countries where we work;
- Perform appropriate due diligence on all potential partners, and refuse to associate with any company, or employ any individual suspected of partaking in modern slavery and/or human trafficking;
- Ensure all staff, contractors and business partners are (i) regularly reminded of our strict policy on modern slavery and human trafficking, and (ii) agree, by contract, to adhere to our “Code of Conduct” when working on opportunities and projects with Aspen Medical;

- Maintain and review “whistle-blowing” procedures for the reporting of observed acts of modern slavery and human trafficking, and communicate these procedures to all Aspen Medical staff, independent consultants, and consultants’ and contractors’ staff;
- Immediately report to the relevant authority any known act of modern slavery, or human trafficking committed by its staff, contractors, partnering companies or any third-party agent in the course of their commission on any lead, bid or project;
- Suspend any employee suspected of partaking/aiding/abetting/failing to recognise and notify and forms of modern slavery and/or human trafficking, subsequently terminating their contract should any later investigation find they have acted in direct contravention of our “Code of Conduct”; and
- Cooperate fully with any legitimately constituted investigative body which may conduct any inquiry into the administration of our business.

Code of Conduct

In our conduct Aspen Medical, its staff, its business partners and all independent consultants pledge that:

We will:

- ...adopt a “zero tolerance” approach to all forms of corruption modern slavery and human trafficking;
- ...ensure compliance with all Australian, international and national anti-bribery legislation governing the operations and actions of companies/individuals;
- ...engender a sense of trust and respect with all partner companies;
- ...perform all services with integrity and adhere to the principles of fair and transparent procurement;
- ...apply due skill, care and technical diligence in services rendered to our client(s);
- ...undertake appropriate due diligence on suppliers;
- ...ensure all staff and suppliers are (i) regularly reminded of our strict policy on corruption, modern slavery and human trafficking and (ii) agree, to adhere to the principles laid down in Aspen Medical’s “Business Ethics Policy”;
- ...disclose any conflict of interest, potential conflict of interest or future involvement that may potentially create a conflict of interest;
- ...ensure all staff and suppliers involved in project delivery complete the context-appropriate anti-corruption training and are provided with Gift registers and appropriate guidance;
- ...ensure staff and suppliers are aware of and understand the “whistle-blowing” procedures for the reporting of observed acts of corruption/bribery/fraud/extortion/modern slavery/human trafficking;
- ...ensure staff and suppliers are aware of and understand the procedures for reporting any known act of corruption, fraud, bribery, modern slavery or human trafficking;

- ...immediately suspend any employee suspected of committing a corrupt offence, or partaking/aiding and abetting in acts of modern slavery and/or human trafficking pending further investigation; and
- ...cooperate fully with any legitimately constituted investigative body which make inquiry into the administration and management of the bid or project.

And we will not:

- ...wilfully attempt, or otherwise sanction attempts, to influence the decision of any tendering body through deliberate misrepresentation of ability, or other acts of corruption including bribery and extortion;
- ...carelessly or intentionally do anything to injure the reputation of a third-party, nor attempt to prejudice the appointment of rival individual/company through negative campaigning;
- ...become involved in any activity which will, or might, involve dishonestynor comply with any direct instruction to act dishonestly;
- ...become involved in any activity which will, or might result in modern slavery or human trafficking;
- ...instruct any other person to act dishonestly or to knowingly commit any act of corruption, bribery, extortion, fraud, modern slavery or human trafficking;
- ...give or accept gifts, payments or other benefits – including exchange of favours – if the intention is to improperly influence actions or decisions;
- ...attempt to have claims/payments approved in any way other than the legitimate and recorded means; or
- ...dishonestly provide, conceal, or approve work, materials, equipment or services which are not of the quality and quantity required under contract.