

Code of Ethics and Business Conduct Policy

Rationale

The intention of this policy is to ensure that all employees understand the commitment to operating our company with integrity and in accordance with the highest ethical standards. IBRS expects all employees to achieve and maintain a high standard of conduct and work performance.

Scope

This policy covers all directors, employees, and advisors of IBRS.

Procedure

IBRS expects that employees will act with respect and dignity and set an example among their business, personal and professional acquaintances by their conduct.

Any employee found to have breached this policy may be subject to disciplinary action, up to and including termination of employment.

All employees are to:

- Observe and obey the law and act honestly and ethically;
- Maintain competent performance standards;
- Carry out all reasonable instructions and comply with all IBRS's policies and procedures;
- Maintain a professional, businesslike approach and appearance befitting 'the face of IBRS' to clients and the wider business community;
- Protect all IBRS's assets personally entrusted to them and assist in protecting IBRS's assets in general;
- Actively maintain IBRS's intellectual property rights and confidentiality agreements pertaining to their employment contract;
- Foster a safe, fair and equitable work environment and not behave in an unsafe, discriminatory or harassing way to other employees or clients;
- Actively avoid behaviour that constitutes conflict of interest such as receiving inappropriate bribes or gifts; marketing products/services in competition with IBRS; using 'inside information' to gain or maintain a financial interest in any organisation IBRS does business with.



Legal Compliance and Governance

IBRS is committed to obeying all relevant Australian federal, state, and local laws and regulations.

Australian Law Compliance

Personnel must respect and comply with all applicable Australian laws, including, but not limited to:

- Tax and financial reporting obligations.
- Consumer law and fair trading practices.
- Licensing and regulatory requirements relevant to our industry.

Inclusion and Diversity

We are committed to a workplace free from discrimination, bullying, and harassment, in line with the Fair Work Act 2009 and relevant Australian anti-discrimination legislation as outlined in IBRS's Inclusion and Diversity policy. Personnel must not engage in any conduct that discriminates against a person based on characteristics such as age, race, gender, religion, sexual orientation, disability, or marital status.

Work Health and Safety

IBRS is committed to providing a safe workplace as outlined in the IBRS Workplace Health and Safety policy. All Personnel must:

- Comply with all state/territory WHS laws, policies, and procedures.
- Take reasonable care for their own health and safety and that of others who may be affected by their actions.
- Report all hazards, incidents, and injuries immediately

Corporate Governance

All officers, employees, and advisors must not make improper use of their position or IBRS information to gain an advantage

Business Integrity

We conduct our business with honesty, transparency, and fairness.

Honesty and Accuracy

All business records, expense reports, communication, and public statements must be truthful, accurate, and complete. Misleading or deceptive conduct is strictly prohibited.



Anti-Bribery and Corruption

We have a zero-tolerance policy for bribery and corruption. Personnel must not give, solicit, or accept bribes, kickbacks, or improper payments from anyone, including government officials, suppliers, or customers, to gain a business advantage or harm the IBRS.

Conflicts of Interest

A conflict of interest occurs when personal interests could improperly influence, or appear to influence, professional judgment. Personnel must:

- Avoid situations that could lead to a conflict of interest.
- Immediately disclose any potential or actual conflict to your manager or Nick Bowman.
- This includes the acceptance of gifts, hospitality, or outside employment that could compromise objectivity.

Although IBRS employees are generally free to engage in personal and financial business transactions, this freedom is not unlimited. Employees have a duty to avoid situations where loyalties may be divided between IBRS's interests and other interests.

These include the following:

- Dual Employment: Employees shall not accept any other work elsewhere where such activities interfere with their duties and job performance or which is complementary to, or conflicts with their employment with IBRS;
- Giving IBRS business to a company in which an employee, a relative or a close friend holds a financial interest;
- Involvement in a company, which provides products or services related to your job at IBRS;
- Providing confidential IBRS's information to a family member who becomes employed by a direct competitor.

An employee should discuss with their manager if they are working elsewhere; have involvement in a company whose products or services directly relate to their job and if a family member works with a direct competitor. If you encounter a potential conflict of interest, you must disclose the details and stand back from any related decision-making process. In addition, you should avoid apparent conflicts of interest, which occur where a reasonable observer might assume there is a conflict of interest and, therefore, a loss of objectivity in your dealings on behalf of IBRS.

Gifts and Gratuities

It is in IBRS's best interests to establish mutually beneficial commercial relationships with our suppliers and business partners. Offering or accepting gifts, entertainment or personal favours is only acceptable if their value is modest and the practice is consistent with local business practice.



You should not accept gifts, entertainment or favours which might place you under any obligation or which would reasonably be viewed as influencing business transactions. Any gift or hospitality of more than token value must be reported to senior management who will determine whether it can be accepted.

Confidentiality and Privacy

We are entrusted with confidential business information and personal data. Personnel must:

- Protect the company's proprietary and intellectual property information.
- Adhere strictly to the Australian Privacy Principles (APPs) under the Privacy Act 1988 when handling the personal information of customers, suppliers, and other personnel.
- Information held within the IBRS such as business plans, pricing, and financial data, remains the property of IBRS and must not be disclosed outside of IBRS.

Employee Conduct and Workplace Culture

We foster a supportive, professional, and productive environment.

Respectful Workplace

Personnel must treat all colleagues, clients, and visitors with respect, courtesy, and professionalism. Workplace bullying, intimidation, sexual harassment, or any form of disrespectful behaviour will result in disciplinary action.

Use of Company Resources

Company assets, including equipment, software, and IT systems (like email and internet), are provided for business use. Personnel must use these resources responsibly, efficiently, and legally. Incidental personal use is permitted provided it does not interfere with work or violate this Code.

All IBRS property must be returned within the specified time frame or at termination of the employee's employment. IBRS has the right to request IBRS property be returned at any time.

If an employee loses IBRS property, they need to report it immediately to their manager.

Drugs and Alcohol

Personnel must not attend work or conduct business while under the influence of illegal drugs or alcohol to an extent that impairs judgment, performance, or poses a WHS risk.



Fraud

Fraud of any description will not be tolerated. Individuals have an obligation to report any suspicions of fraud to senior management.

Political Activity and Contributions

Employees are free to be personally involved in political activities in their own time. However, the impression must not be created that this activity represents IBRS.

Reporting and Accountability

We encourage personnel to raise concerns and report suspected violations without fear of retaliation.

Reporting Mechanisms

If you suspect a violation of this Code, a law, or a company policy, you must report it promptly to your manager or Nick Bowman.

Whistleblower Protection

We protect personnel who make reports in good faith, even if an investigation later finds no violation. We prohibit any retaliation against a whistleblower, in accordance with the protections provided under the Corporations Act 2001. Any personnel who retaliates against a person who has reported a concern will face disciplinary action.

Consequences of Violations

Violations of this Code, depending on the severity and frequency, will result in disciplinary action up to and including immediate termination of employment or contract, and may involve legal action.

Stakeholder and Community Relations

We are committed to being a responsible corporate citizen.

Customer Relations

We commit to dealing with our customers fairly, honestly, and promptly. We honour our contracts and warranties and strive to provide excellent service and quality.

Supplier and Partner Relations

We select our suppliers and business partners based on fair and objective criteria. We are committed to paying our invoices promptly and maintaining mutually respectful, ethical relationships with all third parties.



Environmental Responsibility

We commit to actively seeking ways to minimise the environmental impact of our operations. This includes reducing waste, increasing energy efficiency, and promoting sustainable practices where practical for a business of our size.

