

# OUR COMMITMENT TO BUSINESS ETHICS AND AVOIDING CONFLICTS OF INTEREST



## Business Ethics

Polarcus is committed to conducting business in a fair, honest and ethical manner to ensure the interests of all our stakeholders are managed responsibly.

Polarcus employees and representatives shall never give, offer or authorize, directly or indirectly, anything of value to a potential customer or government official to obtain any improper advantage.

Polarcus employees and our representatives shall never offer, pay, solicit, or accept any bribes in any form. All our suppliers are expected to recognise and observe the same commitment.

All financial transactions shall be properly recorded in the Company's accounting system and our accounting procedures will be supported by adequate internal controls. All Polarcus accounting records are subject to internal and external independent auditing. Polarcus shall comply with all applicable laws and regulations, including those governing economic sanctions.

## Avoiding Conflicts of Interest

A conflict of interest may arise when an individual's private interests intersect with their professional obligations. The existence of a potential conflict may compromise, or be perceived to compromise, Polarcus' Core Values and Commitments. Polarcus employees are expected to avoid any actual or apparent conflict between individual private interests and the Company's interests.

The Company directors, management and employees must disclose their outside professional activities and any financial interests in other entities that they or their immediate family members may create a conflict with their position at Polarcus.

Polarcus operates an open-door policy from the CEO and throughout the organization where any work-related concerns can be discussed freely and openly without any fear of retribution.

If an employee has reasonable grounds to believe that reporting an incident would lead to retaliation against them, has implications of bribery, corruption or financial irregularity, or where a previously submitted report regarding the same irregularity has not been corrected, the employee can formally voice their concerns via one of the following options:

**[whistleblower@polarcus.com](mailto:whistleblower@polarcus.com)**: an email will automatically be sent to the CEO and a nominated Polarcus Board member to action.

**[whistleblower.board@polarcus.com](mailto:whistleblower.board@polarcus.com)**: an email will automatically be sent to the Chairman of the Polarcus Board of Directors and one other nominated Polarcus Board member to action.

The Polarcus 'whistleblower' communication mechanism can also be used by any other stakeholder (including any supplier or client representative) that wishes to raise a concern or report. Reports can be submitted anonymously by email or in writing.



Duncan Eley, CEO