

# Ethics Policy

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## SCOPE

TDG Environmental (TDG) is committed to conducting business professionally at all times and to the highest ethical standards, so that our business partners have confidence and trust in TDG's business dealings, services and decision making. TDG is committed to our Code of Conduct that set out the standards for ethical behaviour of the company's Directors, Managers and Employees. TDG expects all its employees to act honestly, transparently, and responsibly in their decision making and business partnerships.

This policy applies to all employees and contractors of entities within TDG.

## POLICY

### 1. Ethics Statement

TDG must always strive for professional excellence and exhibit a professional attitude based upon sound judgment free of personal biases. The most important responsibility of management is to believe in, and then act upon, the shared values of our organisation. TDG's values are integral to the way we do business, and our culture reflects this. Our core values are:

- People and Culture
- Innovation
- Focus
- Influence

### 2. Personal Honesty & Integrity

In all business dealings TDG expects Directors, Managers and Employees have a responsibility to the company, and their colleagues, to demonstrate and observe the highest standards of ethical, honest, and professional conduct. This includes:

- Always acting honestly and with impartiality.
- Conforming with all legal obligations.
- Not engaging in practices that give one party an improper advantage over another.
- Being prepared to attest to honesty, and not engaging in any form of collusive practice.
- Protecting confidential information.
- Clearly specifying all requirements and criteria for evaluation and responding promptly to requests for advice and information.
- Immediately disclosing and managing potential conflicts of interest.
- Reporting to TDG's management any suspected breaches of these ethical standards

### 3. Modern Slavery

Modern slavery is an ongoing issue worldwide.

Modern slavery is a crime and a violation of fundamental human rights and involves the serious exploitation of workers, this could include threats or deceptive measures to strip victims of their freedom. The Australian Modern Slavery Act (2018) defines slavery into eight areas.

- Human Trafficking
- Slavery
- Servitude
- Forced Marriage
- Forced Labour
- Debt Bondage
- Deceptive Recruiting
- Child Labour

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All of these practices deprive individuals of their liberty in order to exploit them for personal or commercial gain. Our company values instil in us the obligation to conduct our business with integrity.

TDG will not knowingly support or do business with any organisation that is involved in such practices and we would seek to terminate any relationship immediately where evidence of the same occurred.

## 4. Inducements & Rebates

Purchases or sales of goods and services must not lead to Directors, Managers and Employees or their family receiving personal inducements or rebates. "Inducements or rebates" can take many forms and are not limited to direct cash payments or credits. In general, if a Director, Manager or Employee stands to gain personally through the transaction, it is prohibited. Such practices are not only unethical, but, in many cases, are illegal.

Airline Frequent Flyer Programs and Hotel Loyalty Programs attributed to Directors, Managers and Employees business travel and accommodation are an acceptable personal reward for the inconvenience of travel. However, decisions regarding with which airline or hotel chain a booking will be made will be decided by TDG based on considerations such as price and availability.

## 5. Financial Responsibility

Proper use of company funds is a trust that must continually be guarded. TDG's funds must be always managed in the most efficient manner. All rules and regulations pursuant to company funds must be adhered.

## 6. Dealing with Suppliers & Customers

TDG obtains and keeps our business because of the quality and value of our products and services, and the respect and confidence we instil in our customers. Conducting business with suppliers and customers can pose ethical or even legal problems, especially in global transactions where local laws and practices may be different from those with which we are familiar. The ability to comply with TDG's principles effectively will be the dominant factor in determining whether we can enter into business partnerships or remain with certain suppliers or customers.

Business partners who engage in any unethical or illegal (including corrupt) behaviour could lead to:

- Termination of contracts.
- Loss of future work.
- Loss of reputation.
- Investigation for corruption.
- Matters being referred for criminal investigation.

## 7. Managers & Employees

All Managers and Employees are responsible for observing this policy, managers are also responsible for investigating any alleged violations of the policy.

## 8. Board of Directors

The Board of Directors of TDG requires management to conduct business in accordance to this policy. The Board upon notification of wilful violations of the policy shall assure that such violations are addressed, that the legal rights of individuals are protected, the Company's legal obligations are fulfilled, and that proper corrective action is taken. The Board will further see that measures are put in place to prevent recurrence of violations.

## 9. Penalty

Violation of this policy shall be sufficient cause for discipline and may be cause for immediate dismissal.

## 10. Declaration

TDG's Ethics Policy provides an outline of the ethical framework within which the company operates. It reinforces TDG's core values for conducting business as well as stating what the company expects from its Employees and Business Partners.

It is a requirement of your employment with TDG that you have reviewed the Ethics Policy and understood the need to abide by it when conducting business with, or on behalf of the company.