Pacific Internet Solutions

Code of Conduct

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Introduction

Since the company's founding, integrity, honesty, fair dealing and full compliance with all applicable laws have guided the practices of Pacific Internet Solutions (PIS). Since then, the workers have upheld and fulfilled this commitment in their daily responsibilities, while the company's reputation is one of the most important factors.

The PIS Corporate Business Principles set out certain values that PIS undertakes to uphold globally. This code of conduct specifies the principles and helps to implement them on an ongoing basis through the establishment of certain non-negotiable minimum standards of behavior applicable to key areas.

Overview

This code of conduct is subject to The Australian Computer Society (ACS) which is the recognized association for Information & Communication Technology (ICT) Professionals, which includes around 16,000 members from all levels of the information and communication industry. As Pacific Internet Solutions company we have joined this association seeking the best quality standards for ourselves and society, therefore, each employee, employer or person who has any link with our company must abide by this code of conduct.

The code of conduct that we will now call "the code", is a reference, at least, to fundamental, labor, <u>environmental rights</u> and practices against any act or fact that may occur against the interests of the company. This code is a formal statement of the principles, values and ethical standards by which we are governed as a company.

We will include guidelines on the relations between workers and the company and the possible sanctions that can be incurred when going against this code.

Purpose

Our goal is efficiency, trust and responsibility. Based on these 3 fundamental pillars as objectives that we tirelessly pursue, we have created this code, which will serve as the main manifesto of the environment we seek as an information company. We seek to promote

principles such as honesty, integrity, confidentiality and responsibility in all departments that work together to deliver an efficient service. For this, we have created this code that will serve as a guide, but also as a reference book that could be used in any situation that requires information to find a quick and effective solution.

Who is this code for?

This code is addressed to any person, whether employee or employer, contractor, supplier or directly related to Pacific Internet Solutions.

Articles and Standards.

Article 1. Compliance with and Respect for the law

We respect the law at all times

PIS and its employees are governed by the law. Compliance with all applicable laws and regulations must never be compromised. In addition, employees must adhere to internal rules and regulations as applicable in a given situation. Such internal regulations are specific to the Company and may go beyond the requirements of the law. However, the code does not violate the rights to privacy and dignity of workers, as well as their freedom of expression and information.

Article 2. Honesty and Integrity

Within our fundamental principles are honesty and integrity. Both of these principles have helped us create and maintain a reputation for high quality both among our employees and with society in general. We are committed to:

_Do not break <u>public</u> trust within the different professions. The truth will be told in dealings between workers, suppliers and employers.

_Honesty and integrity are in all professional and behavioral decisions.

_The truth will be privileged, more than a lie or falsehood that seeks a quick profit in the short term. Building long-term trust based on truthfulness will be preferred.

Article 3. Conflicts of interests

We will always act in the best interests of PIS

A conflict of interest occurs when the personal interests of an employee or the interests of a third party compete with the interests of PIS. In this situation, it may be difficult for the employee to act fully in the interests of PIS.

Whenever possible, employees must avoid conflicts of interest or if an employee is faced with a situation that may involve or give rise to a conflict of interest, the employee must immediately notify his superior and/or the person in charge of the human resources, legal or compliance area in order to resolve the situation in a fair and transparent manner.

_ The person who wants to avoid a conflict of interest should not participate in a job in another company that is related to the interests of PIS.

Article 4. Confidentiality

We value and protect our confidential information and respect the confidential information of others.

Confidential information is information that is not or is not yet public knowledge. It includes trade secrets, business plans, marketing and services, engineering and manufacturing ideas, designs, databases, records, financial or other unpublished information.

The continued success of PIS depends on the use of confidential information and its nondisclosure to third parties. Unless required by law or authorized by company management, employees will not disclose confidential information or allow its disclosure. This obligation subsists once the employment relationship has expired. In addition, employees must use their best efforts to prevent unintentional disclosure of information by taking special care when storing or transmitting confidential information.

Article 5. Management of privileged information

We respect and follow the rules for handling privileged information.

Failure to comply with this rule may not only result in the application of disciplinary sanctions but also result in the filing of criminal charges.

In case of having doubts about the interpretation or application of the information management regulations, employees should consult the Privacy Requirements document.

Article 6. Bribery and corruption

We repudiate all forms of bribery and corruption

Employees, directly or through intermediaries, must never offer or promise an improper personal or financial favor or other favor in order to obtain or procure business or other advantage from a third party, whether public or private. Employees should also not accept such an advantage in exchange for preferential treatment from a third party. Likewise, employees must refrain from engaging in any activity or conduct that could give rise to the occurrence or suspicion of such conduct or an attempt thereof.

Employees should be aware that offering or giving improper benefits in order to influence the decision of the recipient, even if the recipient is not a government official, can not only lead to disciplinary action but also result in the filing of criminal charges.

Article 7. Personal gains, gifts and transparency

We compete and carry out our activities based solely on quality and competence.

Employees may not be influenced by receiving favors or attempt to improperly influence others by giving favors. Employees may only offer or accept reasonable gains and token gifts that are appropriate under the circumstances and will not accept or offer gifts if such behavior could create the impression that it constitutes improper influence with respect to the relevant business relationship.

When evaluating the situation in accordance with the above, the same employers will apply the most restrictive local practice in order to avoid even the appearance of improper negotiations. In case of any doubt, the employee must request the advice of his superior or the person in charge of the area.

No employee shall offer to third parties, or accept from them, gifts included in the following list, regardless of their value:

_Money _Money loans _Bribery _Similar Monetary Benefits

Article 8. Professionalism and work environment (Professional conduct)

Mainly being professional is something that is achieved over time and applying different measures that reinforce the positive actions of a person.

_As a PIS worker, the professional must have technical knowledge about their profession. These types of aptitudes and competences are developed once the knowledge acquired throughout the university career or the course taken is put into practice.

_ Stay informed of new technologies that may be relevant to the job. In addition to motivating and encouraging your colleagues to do the same, which will cause the work environment to be effective and up-to-date.

_Stay calm, be patient, be focused and pay attention to all the problems or difficulties that may arise at work with the aim of resolving them in a timely manner and in the best way.

_ Promote professional conduct in all areas of work.

Article 9. The Primacy of the public interest

We are proud of PIS's reputation and we also have PIS's best interests in mind in our outside work and activities.

Activities outside of PIS should not take place if they interfere with employees' responsibilities to PIS, or if they pose a risk to PIS's reputation or otherwise conflict with PIS's interests.

In case of any doubt about whether an activity is allowed, employees should consult the person in charge of the Human Resources, Legal or Compliance area.

Article 10. The enhancement of quality of life in workplace environment

The quality of life at work is critical to enjoying the job. After all, most of the waking hours are spent in the workplace.

_Develop close relationships: A 2018 study published by Gallup, indicated that women are 63 percent more inclined to work harder if they have a strong connection with a coworker. The sense that someone is looking out for the best interests provides comfort and reassurance in a work environment. Developing strong relationships will help better about going to the office each day.

_Think "team": Similarly, investing in a collaborative team environment will make more enjoyable. It may seem easier to remain siloed.

_Ensure Work-life Balance: Consider the steps that you can take to remain true to your own needs.

Article 11. Competence

Job skills are all those knowledge, aptitudes and job skills that an individual possesses to competently cover a certain job.

The most valued competences by PIS are the following:

_ Have initiative: People with initiatives and proactive tend to commit to the organization either by solving problems that may arise during work activities, developing projects or getting involved in the tasks to be carried out, which is a great benefit for the company.

_Have a sense of responsibility: A worker who is punctual, responsible for his actions and his work, is highly valued by organizations when selecting personnel.

_Have decision-making power: A person capable of making the right decisions quickly, can face the challenges of everyday life efficiently.

Knowing how to work as a team: Working together to achieve an objective promotes interpersonal relationships, creating a good work environment. Teamwork, where different ways of approaching a project are turned over, usually yields successful results.

Ease of adapting to changes: Getting out of your comfort zone and adapting to changes is the best way to develop and grow professionally.

Knowing how to communicate effectively: Knowing how to transmit ideas and being able to share knowledge is extremely important, especially if it is transmitted to a work group.

Article 12. Environment

Everyone is looking for a good place to work, so the first thing you should consider is behaving well, without forgetting that there are other people around.

The basic rules at work are fundamental for the good development and communication with other co-workers, the rules are the following:

_Be punctual: This is vital for personal image. Always respect the time of entry or if you have a meeting, lunch, etc. Being late generates discomfort with your colleagues since some tasks are delayed.

_ Do not talk bad: It is essential to control the character when you are upset for some reason. No disrespect between employees or employers will be tolerated.

_Eating at the desk: Avoid eating with others, especially if it is food with strong odors, as this can be uncomfortable for others and also distract from the tasks you are doing.

_Use of cell phones with vibrator: The frequent sound of the cell phone, whether for calls or messages, becomes annoying, so it is better to put the time you are in the office on vibrate.

_Keep the workspace clean: Having a dirty place can affect people's performance, so it is always good to try to have a clean place so as not to give a bad image.

_Be respectful <u>of</u> what belongs to others: Even if you trust the other person, it is not correct to take what does not belong to you, so always ask to borrow something before taking it.

Article 13. Families and relatives

Our hiring and staff development decisions will be fair and objective.

Direct family members and partners of employees may be hired as employees or consultants only if their appointment is based on their qualifications, performance, skills and experience, and provided that there is no direct or indirect employment relationship between them. the employee and his family or partner.

These fair hiring principles will apply to all aspects of the employment relationship, including compensation, promotions and transfers, as well as in the event that the relationship develops after the moment in which the respective employee has joined the company.

Article 14. Discrimination and harassment

We encourage diversity and respect the personal dignity of our employees

PIS respects the personal dignity, privacy and personal rights of each employee and is committed to maintaining a workplace that is free from discrimination or harassment. Therefore, employees must not discriminate with respect to origin, nationality, religion, race, gender, age or sexual orientation, nor must they engage in any type of verbal or physical harassing conduct based on the aforementioned or on any other reason.

Employees who feel that their work environment does not comply with the aforementioned principles can discuss their concerns with the person in charge of the human resources area.

Article 15. Compliance with the code

We will consult the Code, comply with its provisions and seek help if necessary

It is the responsibility of each employee to ensure full compliance with all the provisions of this code and, if necessary, seek help from their immediate superior or person in charge of the human resources, legal or compliance area. Doing the right thing and ensuring the highest standards of integrity is the personal responsibility of each employee and cannot be delegated.

Article 16. Equal Opportunity

PIS as an Equal Employment Opportunity employer, aims to provide a working environment free from discrimination, harassment or bullying.

All complaints of harassment, bullying and discrimination will be treated seriously and investigated promptly and impartially.

Any conduct which constitutes discrimination, harassment or bullying may be considered and act of unacceptable behaviour, misconduct or serious misconduct. Where investigation of a complaint establishes inappropriate conduct, appropriate disciplinary action will be taken and may result in termination of employment or your engagement with PIS.

Discrimination: Occurs when one person or group is treated less favourably that another due to an attribute or characteristic that is protected under legislation. Discrimination may be direct or indirect.

In Australia it is unlawful to discriminate against a person on the basis of a particular personal characteristic. Unlawful grounds include, but are not limited to:

_sex

_race, color, or national extraction

_age

_Marital status

_Physical, mental or intellectual disability or impairment

- _Sexual preference, gender identity or transgender status
- _Pregnancy or potential pregnancy
- _Family responsibilities and/or/parental/career status
- _Trade union membership or union/industrial activity
- _Religious or political beliefs

Harassment: Is a form of discrimination and may also be unlawful if it based on particular grounds. Harassment can take many forms. It may be verbal, physical, written or pictorial. Harassment is usually a pattern of behavior but one act may constitute harassment if it is sufficiently serious.

Harassment is conduct that:

_ Is unwelcome or unwanted.

_ Causes offence, intimidation or humiliation. The perception of whether or not the behavior is threatening or harassing lies with the receiver.

_ Occurs in circumstances where a reasonable person would have anticipated that the person harassed would be offended, humiliated or intimidated.

_ Harassment based on sex, race or disability is unlawful under discrimination legislation. Occupational Health and Safety legislation also makes harassment in the workplace unlawful because it constitutes a possible hazard to the health of employees. Conduct that may be considered harassment includes, but is not limited to:

_ Sexual harassment. This is one form of unlawful harassment and may include:

- . Pressure or demands for dates or sexual favors.
- . Unnecessary familiarity for example, deliberately brushing against a person or constant staring at a person.
- . Unwanted physical contact for example, touching or fondling.
- . Sexual jokes or innuendo verbal or transmitted via electronic or any other media.
- . Offensive telephone calls and/or text messages of a sexual nature.
- . Unwelcome comments or questions about a person's sex life in person, by phone, email or text message.
- . Display or circulation by email or text message of sexual material, including magazines, posters or pictures and messages.

_ Verbal or written abuse or comments that degrade or stereotype people because of their race, sexuality, pregnancy, disability, etc.

_Verbal or written public statements that may incite hatred or negativity towards an individual or a group of people.

_ Jokes based on race, sexuality, pregnancy, disability, etc.

_ Mimicking someone's accent, or the habits of someone with a disability.

_ Offensive gestures based on race, sexuality, pregnancy, disability, etc.

_ Ignoring or isolating a person or group because of their race, sexuality, pregnancy, disability, etc.

_ Display or circulation (by email or text message) of racist, pornographic or other offensive material.

_ Using the internet or email to receive, access, store, process or distribute information considered to be of a threatening, obscene, pornographic, or harassing nature may also constitute harassment.

Discrimination is not permitted at any level of the Company or in any part of the employment relationship. This includes areas such as recruitment, promotion, training opportunities, salary, benefits and terminations.

The Company will treat all Employees according to their skills, qualifications, competencies and potential. To support this policy, the Company will:

- . Provide relevant education and awareness programs for all Employees
- . Implement systems and monitor those systems to eliminate all discriminatory practices
- . Ensure procedures are in place to address any cases of discrimination or harassment
- . Appoint trained contact persons to handle harassment concerns.

Breach of this policy is viewed very seriously by the Company and could lead to disciplinary action against the individual concerned.

The Enhancement of Quality of Life: The development of ICT has had a significant impact on our society and way of life. Whilst this impact has been beneficial to a very great extent, like all technologies, ICT has also had some negative effects, and will continue to do so. An ethical approach to your work will help to recognize and minimize these adverse effects. You should promote equal access to the benefits of ICT by all members of society.

In accordance with this value, you will:

. Recognize, in your work, the role that ICT can play to enhance the quality of life of people, particularly the disadvantaged or those with disabilities.

- . Protect and promote the health and safety of those affected by your work.
- . Understand, and give due regard to, the perceptions of those affected by your work
- . Attempt to increase the feelings of personal satisfaction, competence, and control of those affected by your work.

Article 17. Occupational Health and Safety

The Company is committed to providing a safe and healthy workplace, and to developing, maintaining and promoting safe and productive work practices in all aspects of its business. The Company is committed to complying with all occupational health and safety laws and regulations governing its activities.

The Company must take into account the impact of health and safety issues when making business decisions and must ensure that

business decisions do not comprise our commitment to avoiding injury to people.

Contact

When in doubt, employees should always be guided by the basic principles set forth in the introduction to this code.

any breach of this code may lead to the application of disciplinary measures, including the possibility of dismissal and, if applicable, the initiation of legal action or the application of criminal sanctions.

For any questions or comments, you may have regarding this policy or the procedures described in it, please do not hesitate to contact us. As Pacific Internet Solutions we are excited to be able to clarify your doubts as soon as possible, our staff will be available for you.

Below are the contact methods of our Data center:

www.PacificInternetSolutions.com Contact: 048975216 PacificInternet@Solutions.com @PacificInternetSolutions #Conductcode

2/246 Varsity Parade, Varsity Lakes QLD 4227