

## Visual Security Code of Conduct

### **Introduction:**

Everyone working for Visual Security has a part to play in achieving the way we do business. While carrying out our responsibilities, there are requirements in terms of how we conduct ourselves.

Visual Security has values to describe expected behaviour of our employee's and our Code of Conduct details requirements to put our values into actions.

### **Our Values:**

How we achieve best practices in providing the best service possible is important to us. As a service provider, we are regarded both in terms of what we do and how we behave.

Our five core values that describe the types of behaviour that are expected and encouraged at Visual Security is:

- Professional, Integrity and Honour at all times;
- Achieving and exceeding our industry standards;
- Fairness and honesty in everything we do;
- Respect for everyone;
- Violence and Aggression has no place in our business.

### **Way We Work:**

Employees are required to observe ethical practices in all activities undertaken for and on behalf of Visual Security. We should all bear in mind that other people's perceptions of our actions are important.

Employees should act to avoid any situation, action, activity or practice that might be considered improper or might cause embarrassment to Visual Security.

Visual Security will:

- Act in all matters that merits public trust and confidence;
- Conduct business in an ethical, law abiding and responsible manner;
- Ensure employees are aware of what is expected of them, including full commitment to the highest ethical and legal standards; and
- Understand and interact constructively with clients and people of the public.

### **NT Professional Standards of Crowd Control and Security Officer:**

Director-General of Licensing is the authority appointed under the Private Security Act which is responsible for the administration of the Act and this code.

All Visual Security employees will abide by the NT Professional Code of Practice for Crowd Controllers and Security Officers.

**Compliance with Law:**

You must fully and diligently comply with all applicable laws and regulations. You are responsible for ensuring that you are familiar with all applicable laws and regulations relevant to your work. Under no circumstances should you take any action or knowingly be a party to any action that is illegal or could be regarded as of doubtful legality. Ignorance of applicable laws and regulations will not be considered an appropriate reason for non-compliance.

**Compliance with Policies and Procedures:**

You have an obligation to comply with the policies and procedures of the company and, where applicable including this Code of Conduct. These policies are available on the Visual Security website or can be obtained from the Operations Manager. They are reviewed and updated from time to time on an annual basis.

**Conflict of Interest:**

You must ensure that there is no actual or apparent conflict between your personal interests and the performance of your duties; and Identify, and fully disclose in writing to your manager, possible conflicts of personal or financial interests.

The use of your position or the assets or influence of the Company for personal advantage or for the advantage of others is prohibited.

You should declare to your manager any financial interest (including shareholdings) you may have, in any decision they are required to make in the course of your employment.

An actual or apparent conflict of interest may arise from acquiring, buying, selling or otherwise dealing in, either directly or through others, any interests in any entity that has or may have any material type of business arrangement with Visual Security. This includes, but is not limited to, entities that are targets for acquisitions by Visual Security. Whenever you have, in the course of your employment with Visual Security, obtained "price sensitive" information in respect of that other entity, you and your associates are prohibited from any dealing in the securities of that entity.

**Protection and Use of Company Assets:**

You must not be involved in theft, fraud, or misappropriation of company assets.

This includes but is not limited to:

- Intentionally disregarding or abusing standard company procedures;
- Misuse of authority or position to gain benefit for yourself or another person;
- Assisting or involvement with others in misdemeanours; or
- Withholding information relating to the defrauding of Visual Security, its suppliers or its customers.

Disciplinary action and/or, in certain circumstances, civil or criminal action may be instituted in the event that an employee is involved in theft, fraud or misappropriation of company assets.

**Business Gifts and Entertainment:**

The offer, payment, soliciting or acceptance of bribes in any form is prohibited. You must not, under any circumstances demand gifts, rewards, benefits or hospitality that could be interpreted as being in exchange for a favour or favourable consideration.

**Equal Opportunity and Discrimination:**

Visual Security is committed to providing a workplace that is free from discrimination, harassment and victimisation. As such, we aim to embed Equal Employment Opportunity and anti-discriminatory practices into all aspects of our operations. Where appropriate to our business, Visual Security will develop and implement affirmative action strategies.

You must not, under any circumstances, behave in a manner that could lead directly or indirectly to another individual being discriminated against in relation to any company business.

Any person found to have directly or indirectly discriminated against another person will be subject to disciplinary action. You may also be liable under civil and/or criminal law.

**Bullying and Harassment:**

You must not, under any circumstances, behave in a manner that could reasonably lead to another person being injured, humiliated, intimidated or offended.

Any person who is found to have bullied or harassed another person or who has participated in the bullying or harassment of another person will be subject to disciplinary action. You may also be liable under civil and/or criminal law.

**Other Inappropriate Behaviour:**

You must not participate in any behaviour that could cause offence or harm to other people. Examples of such behaviour may include:

- Making false or malicious statements about other employees, Visual Security products;
- Gambling at work (unless it is a sweep authorised by the site general manager according to local custom); and
- Horseplay, practical joking or skylarking at work

**Visual Security Employee and Management Accountabilities:****Employees of Visual Security must:**

- Comply with this Code;
- Perform their duties diligently and effectively;
- Recognise fellow employees' rights to freedom of association and non-association;

- Work cooperatively with fellow employees and take care to ensure their actions do not endanger the safety and wellbeing of themselves and others or the environment;
- Be familiar with Visual Security policies and procedures;
- Be aware of any laws or regulations applicable to their work or impacting on their area of responsibility.

**Visual Security Management must:**

- Comply with this Code;
- Take responsible measures, including the establishment and maintenance of proper systems of control, to prevent any breach of this Code;
- Periodically review compliance with the Code and establish procedures for obtaining reports for the purposes of review;
- Take appropriate action against any employee breaching the Code;
- Work cooperatively with fellow employees and take care to ensure their actions do not endanger the safety and wellbeing of themselves and others or the environment;
- Be familiar with Visual Security policies and procedures;
- Be aware of any laws or regulations applicable to their work or impacting on their area of responsibility.

Sincerely,



Jim Kelly  
Managing Director