



Solutions

CODE OF CONDUCT

Government Relations Solutions

Code of Conduct

Preamble

This *Code of Conduct* is founded on three concepts:

- Free and open access to government is an important matter of public interest;
- Representing client interests to public office holders is a legitimate activity;
- Representation and advocacy must be undertaken in an open, honest and fully accountable manner.

It was implemented from the company's inception, prior to any Government in Australia having a "*Register of Lobbyists*" and their respective codes of conduct. We believe that a *Code of Conduct* is fundamental to promoting public and client trust in the integrity of government decisions resulting from interaction with GR Solutions. To this end, any work undertaken by our company is required to abide by standards of conduct, which are set out below.

Principles

Integrity and Honesty

We will conduct with integrity and honesty all contact with public office holders, clients, employers, the public and other government relations companies.

We will not make misleading, exaggerated or extravagant claims about the nature or extent of our ability to achieve outcomes.

We will advise clients where their objectives may be illegal or unethical, and refuse to act for a client in pursuit of any such objective.

Openness

We will at all times, be open and frank about our consulting activities, while respecting confidentiality.

Professionalism

We will observe the highest professional and ethical standards and conform fully to all Australian Federal and State Government requirements of government relations companies, their employees and contractors. GR Solutions are registered lobbyists in the Commonwealth of Australia and in the State jurisdictions of New South Wales, Victoria, Queensland, Western Australia and South Australia.

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Company Rules

Transparency

1. Identity and purpose

We will, when making a representation to a public office holder, disclose the identity of the person or organisation on whose behalf the representation is made, as well as the reasons for the approach.

2. Accurate information

We will provide information that is accurate and factual to public office holders. Moreover, we will not knowingly mislead anyone and shall use proper care to avoid doing so inadvertently.

3. Disclosure of obligations

We will indicate to our clients, our duties and obligations under any Australian Federal and State legislation.

Due Diligence and Best Efforts

4. Advocacy

We will vigorously and diligently advance and advocate our clients' interests.

5. Effort

We will devote the necessary time, attention, and resources to our client's interests.

6. Keeping our Client Informed

We will keep our clients informed regarding the work that we are undertaking and to the extent possible, will give our clients the opportunity to choose between various options and strategies.

Confidentiality

7. Confidential information

We will not divulge confidential information unless we have obtained the informed consent of our client, or disclosure is required by law.

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8. Insider information

We will not use any confidential or other insider information obtained in the course of our lobbying activities in an unethical manner or to the disadvantage of our client.

Conflict of interest

9. Disclosure

We will inform our clients of any actual, potential or apparent conflict of interest, and obtain the informed consent of each client concerned before proceeding or continuing with the undertaking.

10. Competing interests

We will not accept clients or assignments with conflicting or competing interests.

Improper influence

11. Undue Pressure

We will not directly or indirectly exert undue pressure on a public office holder.

12. Financial Incentive

We will not offer, give or cause a client to give, any financial incentive to any public office holder or to receive any incentive that could be reasonably construed as a bribe or solicitation of favour, nor will we propose or undertake any other action that would constitute an improper influence on a public office holder.

13. Use of Confidential Information

We will not use, for purposes other than those of our mandate, confidential information obtained in the course of our consulting activities.

14. Company Board Appointments

We will not appoint any Member of Parliament to the company board or pay any retainer or commission to any Member of Parliament or person acting on their behalf.