



Code of Conduct

## Introduction

At Sententia Consulting, we are committed to the highest standards of behaviour in everything we do. When we established this firm in 2020, we sought to create a firm that genuinely lived its values and was uncompromising in the promotion of positive impacts of consulting on our clients, our team and our community. This reflects our values as a firm and our values as individuals – we have made sure of that through our selection of the people that join our firm or partner with us.

Our vision is to make a significant and positive contribution to society, through consultancy that values big thinkers who solve unique problems. That significant and position contribution will come not only by *what* we do, but also by *how* we do it.

By operating consistent with our values, and consistent with our behaviours, we protect and enhance our reputation, and enhance the performance and reputation of our clients. This is what the market deserves from its consultants, and it is what we are committed to deliver.

Our Code of Conduct defines the standards of behaviour for which we hold each other responsible. It outlines the responsibilities that all Sententia Consulting people have to each other, our clients, our partners and the community more generally. These behaviours and responsibilities will guide our actions and position us to deliver our vision and on that basis they represent our highest priority.

## Application of this Code of Conduct

The Code of Conduct is intended for use by:

- All of our employees including contractors, who are expected to uphold this Code and be accountable for the behaviour consistent with this Code; consciously and consistently model the behaviours outlined in this Code; and report immediately any behaviours that are inconsistent with this Code including all violations or potential violations of law, regulation, ethical standards or our policies.
- Our partners and leadership team, who also have a responsibility to communicate in word and deed the values and principles of the firm; to promote a workplace environment that encourages respectful, honest and open communication; and to make decisions that are consistent with our Values and their responsibilities.
- Suppliers, partner organisations, clients and the general public, to understand Sententia Consulting and the behaviours they can expect from engaging with us.

The Code of Conduct establishes a baseline for our expected conduct and treatment of one another however it does not diminish any contractual or legal requirements placed on individuals of the firm.

The Code of Conduct will be continually reviewed for applicability and relevance in the context of community expectations and the norms of the environments within which we work.

## Our Values

Our Values are the foundation of Sententia Consulting, the work that we do and the way our business operates. They define our culture and demonstrate our commitment to the highest standards of personal and professional conduct.

- Drive change and equip people for it;
- Deliver quality and consistent excellence;
- Empower and invest in our people and clients to succeed together;
- Simplify the complex;
- Embrace diversity in people, skills and ideas;
- Give every client one hundred percent; and
- Uncompromising integrity and honesty.

## Our Commitments

### Comply with laws, regulations and standards

Sententia Consulting's Code of Conduct does not operate in isolation. We comply with all relevant laws and regulations, human rights, employment standards, work health and safety legislation, licence requirements and lawful directions given by persons in authority.

We also uphold and act in accordance with the professional standards of the professional bodies that we are members of and Sententia's policies and procedures, including Sententia Consulting's Values.

An employee must notify Sententia Consulting immediately if they are aware of any adverse findings made by a court, commission, tribunal or other statutory or professional body regarding conduct or capacity to deliver services.

### Maintain our objectivity and independence

Sententia Consulting strives to provide advice and services that are in the best interests of our clients, free from bias or prejudice and delivered in an open and transparent manner. We will promote our services honestly, compete fairly and support a free and competitive market.

Sententia Consulting maintains its independence by:

- Complying with legislation, regulations and standards;
- Provide high quality and innovative client service;
- Charging fair and reasonable fees for the work we deliver;
- Remaining objective in all our work;
- Not allowing bias, conflicts of interest or undue influence to override our professional judgment; and
- Identifying and managing conflicts of interest in an open and transparent manner with our clients, before accepting an engagement that would present a perceived or potential conflict.

### Protect and safeguard confidential information

Sententia Consulting takes measures to protect and safeguard the confidential and personal information that we hold, by collecting and handling it in compliance with applicable laws, professional obligations, contractual obligations in client agreements and our own data management policies and practices.

This confidentiality extends to sensitive information about Sententia Consulting and its internal business operations including business documents, financial information, decision making processes and employee details.

Sententia Consulting employees must maintain appropriate stewardship of company resources by restricting access and knowledge of internal documents, procedures and affairs to within the firm. This also includes the confidential use and security of our assets, use of devices and access to our premises.

## Use of Client Information

Sententia Consulting does not use client information for any reason other than the service of that particular client. Client information cannot be used for personal, commercial or political ends, or in service of a different client.

Client information constitutes the following:

- Any information that you create, receive, use (in any form) or learn during your employment and/or affiliation with Sententia Consulting;
- Any information that is not generally known by the public, our affiliates, clients or colleagues; and
- Any information of a sensitive nature that if disclosed, could result in financial or reputational harm to our clients or the firm.

Any disclosure of client information must have agreement from both the client and the Engagement Lead unless disclosure is required by law.

Extending Sententia Consulting's commitment to confidentiality and avoiding conflicts of interest, employees and members of their households must declare any holdings or trades of publicly traded securities of any client. Sententia Consulting prohibits employees from holding an investment in a non-public company that they serve or making an investment that creates a conflict of interest for the firm or themselves and any potential occurrence of insider trading.

## Documentation and Record Keeping

Sententia Consulting employees will compile and maintain all documentation and records where relevant, in a complete and accurate fashion whereby employees:

- Comply with relevant legislative and contractual obligations;
- Actively record and store documents and data in a timely manner on Sententia Consulting's corporate systems (where permissible by the client);
- Avoid making any false or misleading entries;
- Respect the confidentiality and privacy of the information held;
- Disclose relevant information only where required while maintaining appropriate confidentiality;
- Ensure that access to documents and records kept are restricted to Sententia authorised employees only;

- Use information only for the purpose for which it was provided;
- Refrain from using confidential information to advantage Sententia Consulting or others;
- Ensure confidential documents are not inadvertently or inappropriately distributed;
- Appropriately dispose of documents where no longer needed, relevant or when asked to do so by the distributor, in a timely manner and consistent with legislative obligations; and
- Maintain appropriate confidentiality after ceasing to have a relationship or working for Sententia Consulting.

## Working with partner organisations and clients

When working with third parties, employees of Sententia Consulting must:

- Not knowingly work with third parties who are corrupt or associated with corrupt or illegal actions;
- Perform proper due diligence prior to engaging, and establishing appropriate risk management plans as appropriate;
- Do not make commitments to third parties without proper authority; and
- Limit information sharing to what is strictly necessary consistent with Sententia Consulting's commitment to confidentiality.

Sententia chooses to work with clients who embody similar values and expectations as our firm and maintain expectations akin to those outlined in this Code.

When deciding to solicit our professional services for a prospective client, consideration is given to the following:

- Overall compatibility with Sententia Consulting's values;
- Our ability to satisfy the prospective client's requirements;
- WHS risk management compatibility;
- Societal impact of work performed;
- Compatibility with our Sustainable Sententia initiative; and
- Impact on our reputation.

## Provide high quality service in everything that we do

Sententia Consulting prides itself on providing the highest quality services and commits to the highest standards of excellence in all work we undertake, irrespective of the client. Our commitment to delivering the highest quality standard of work, professional standards, legislative compliance and contractual obligations are not compromised for financial incentives.

## Make positive societal and environmental impacts

We commit ourselves to making positive contributions to society through the impact of our work and ensuring we are conducting ourselves as good corporate citizens and as a role model for constructive change.

Living our 'Sustainable Sententia' initiative on a daily basis to ensure Sententia Consulting is actively progressing its efforts towards becoming an environmentally

and socially responsible firm both in our own day-to day operations and in the business we agree to take on.

Sententia Consulting is committed to developing initiatives and working with other businesses, charities and government departments that create stronger communities. Sententia Consulting actively supports and encourages employees to be good corporate citizens, including by volunteering if so inclined and has policies in place to support such endeavours that support the community.

## Our Responsibilities

### Display a high standard of personal conduct

All employees are expected to conduct themselves in a manner consistent with this Code of Conduct and our Values. This involves:

- Treat everyone with respect, kindness and honesty;
- Act in a collaborative, supportive and considerate manner at all times;
- Respect people's privacy and personal information;
- Refrain from all forms of harassment and discrimination based on gender, race, religious belief, political affiliation, pregnancy, disability, sexual orientation or illness;
- Refrain from potentially harming the reputation and/or career prospects of others;
- Refrain from allowing personal affairs to affect professional relationships; and
- Not engage in behaviour that could be seen as harassment, bullying, sexual harassment or discrimination.

These expectations of personal conduct extend to employees conduct outside the workplace, including on social media.

Employees are expected to speak up if they observe behaviour that does not adhere to this Code or Sententia Consulting's Values.

### Continue to maintain and develop professional competence

All employees have an ongoing responsibility to maintain professional knowledge and skill at a level required to ensure that we always provide high quality advice and service in everything that we do. This necessarily includes technical skills, non-technical skills and awareness of market, sector and client circumstances and emerging trends and issues.

### Corruption, Bribery, Gifts & Entertainment

Employees have the following obligations to ensure our conduct and firm as a whole avoid corruption or the perception of corruption:

- Raise potential (actual or perceived) conflicts of interest;
- Must not accept gifts intended to influence or provide preferential treatment; and
- Must not engage in bribery, only giving gifts to clients of a reasonable nature and without expectation of preferential treatment.

### Provide a safe, inclusive working environment

Sententia Consulting stands by its people as our most important asset and dedicates itself as a firm to provide the following for its employees:

- Work-life balance;
- A safe and respectful working environment;
- Competitive remuneration and benefits;
- Investment in professional development;

- Culture where issues can be raised without fear of retaliation; and
- Support through mentoring, coaching and guidance.

Sententia Consulting is committed to maintaining an ongoing diverse and inclusive culture and embodies these values and the benefits they bring to the firm by embedding diversity and inclusion within our:

- Employment practices;
- Workforce planning; and
- Client selection processes.

Sententia Consulting is committed to fostering a safe and respectful environment and it is each employee's duty to identify, assess and take steps to ensure all are working within a safe and respectful environment.

Employees and contractors should familiarise themselves with Sententia Consulting's Work Health and Safety Policy to gain an in-depth understanding of our obligations in the workplace in minimising risks, reporting hazards and ensuring people feel safe and supported at the workplace (irrespective of where that workplace is).

## **Create a culture of trust, courage and empathy where everyone can thrive**

Sententia Consulting is committed to embedding practices into our interactions that includes a commitment to cultivating a culture of trust, challenging one another, willingness to embrace new and challenging concepts and frank but respectful discussions. Sententia Consulting will operate as a workplace that is respectful and supporting, while enabling employees to hold, at times, conversations with courage.

This Code reflects these desires and advocates that all employees have a responsibility to ensure they are all striving to create a working environment in which people can feel and be, at all times:

- Courageous;
- Empathetic;
- Supported and connected;
- Inspired and energised; and
- Proud and joyful.

Members of Sententia also ought to avoid creating a workplace or situations in which people might feel powerless, afraid, unwelcome, overwhelmed or incapable.

## **Stay informed about laws, regulations, professional standards and policies**

It is the responsibility of all Sententia Consulting employees to stay informed about any updates to professional standards, laws and regulations that apply to our work and if people find themselves in doubt, they should clarify this uncertainty.

## **Protect our corporate reputation**

Employees of Sententia are expected to act at all times to proactively manage risks to the firm and to build and protect the firm's reputation. Our reputation, integrity,



independence and trust of our clients, employees and community is a significant asset and forms the basis of our ability to perform our duties.

Employees are expected to remain courteous and professional at all times, including in participation in professional memberships and on social media. While people's personal and professional views are distinguishable, employees need to be mindful of the potential conflation of the two in the public eye. Sententia Consulting employees are expected to conduct their personal affairs in a manner that is consistent with the Code and does not reflect poorly on them nor the firm.

All written communications and more formal communications must be courteous, respectful, well written and mindful of upholding Sententia Consulting's reputation. Public comments will not be made, either personally or professionally that might be perceived as being on behalf of Sententia Consulting unless authorised to do so.

### **Reach out when in doubt**

Not every situation can be neatly captured in this Code of Conduct, so help and guidance are always available to Sententia Consulting employees. Employees are not expected, nor should they try to deal with complex situations on their own.

There are many avenues available to seek support including your Engagement Leads, your reviewer and members of the Leadership Team.

## Compliance – Speak up if something does not seem right

This Code is designed to be comprehensive while being digestible with clear expectations that work in conjunction with corresponding policies and general legislative obligations.

Complying with the Code is a group effort and as such, Sententia employees help one another to ensure they are upholding its expectations at all times.

Sententia strives to embody and live its values at all times, largely by fostering a respectful and supportive working culture and is one that enables employees in the event of doubt or non-compliance to reach out to a network of resources for assistance. Sententia Consulting employees should escalate instances of non-compliance or where the Code is unclear as to how best to proceed.

If Sententia Consulting employees are aware of a breach (realised or potential) of this Code and its corresponding values, professional standards, policies and legislative obligations, they need to raise it through one of the contacts listed above so it may be reviewed, and appropriate action taken.

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**Speak up if something does not seem right.**