

Compliance Policy

Compliance Policy Purpose

Generator Property Management Pty Ltd (GPM) seeks to identify and comply with all statutory legal obligations that apply to it, including adhering to the requirements of laws, industry and organisational standards and codes, and principles of good governance.

The objectives of this Policy are to outline GPM's compliance management system and how that system identifies and records GPM's external and internal compliance obligations. The aim of the obligations are to actively promote a culture of compliance and prevention of fraud and corruption throughout the organisation.

GPM is committed to the highest standards of legal and ethical behaviour and to promoting an organisational culture that does not tolerate any act of fraud or corruption. Such acts can lead to criminal prosecutions and other legal action and can damage GPM's reputation and public image.

GPM's employees, contractors, suppliers, and customers are to be made aware of what constitutes fraudulent and corrupt conduct and to communicate that fraudulent and corrupt acts against GPM are unacceptable, may constitute a criminal offence, and will be prosecuted.

Compliance Policy

This Policy applies to all areas and all activities of Generator Property Management Pty Ltd and is an overarching program for the management of compliance obligations within GPM.

The GPM Board and Chief Executive Officer (CEO) are proactive in the identification, assessment and management of Compliance and Risk within the business and for ensuring both the substance as well as the form of Compliance.

This policy has their full support and is seen as a key component in ensuring the long-term success and viability of the business.

The business has a clear and absolute commitment that we will comply with both the spirit and letter of all requirements placed on the business. This commitment applies equally to staff, contractors, suppliers, stakeholders, and all other interested external parties with whom we deal with.

The business commits to ensuring that appropriate resources are allocated to manage compliance obligations as well as develop, implement, maintain, and improve the Compliance program.

Compliance procedures are recognised as an integral part of good management practice and the company is committed to identifying both staff competence and any training needs to ensure they have the ability to manage their compliance obligations.

This Compliance Policy spells out how the business will comply with various laws, regulations, codes, standards and organisational policies and procedures that apply to our business.

Compliance means consistently achieving the performance that is expected by Government, Industry bodies, customers, stakeholders, interested external parties and management and is usually measured by the objective verification that what should be done is in fact being done.

Our objective is to be and behave like “A good corporate citizen”. This involves the consistent application of honesty, efficiency, and fairness in the conduct of all aspects of our business.

The Corporations Act 2001 emphasises compliance because without it a business runs the real and possible risk of not meeting the many and complex requirements of the Corporations Act 2001.

Our approach is to ensure that we have complete and truthful disclosure of all breaches and then quickly rectify any breaches of compliance identified. Given the complex nature of different regulatory requirements we acknowledge that on occasion there may be a conflict between these and GPM's ability to comply in all situations. In the event of a conflicting compliance related issue GPM will endeavour to resolve this as soon as possible and we will be transparent in our efforts to do so. Effective compliance reduces the likelihood of major disruptions to the plans of the business and increases the chances of the business achieving its goals.

A review of the compliance issues and outcomes of the business will be conducted quarterly and reported to the Board Audit Committee.

It is the responsibility of all staff of the business to promptly advise the Chief Executive Officer (CEO) of any situations where it appears there is failure or potential failure of the business to comply with its obligations.

In some situations, it may be necessary to call on the support of outside bodies to help in the Compliance assessment process and such an approach is recommended when required.

All staff and authorised representatives must be familiar with and comply with this Policy and Procedure, understand the importance the business places on the effective operation of our Policies and Procedures and are encouraged to look for improvements to our procedures.

Governance Arrangements

GPM's corporate governance arrangements shall support full compliance with relevant legal statutory obligations imposed on the organisation and its officers including the following areas:

- Corporate governance;
- Trade practices law;
- Environmental law;
- Work health and safety law; and
- Equal employment opportunity.

GPM's governance arrangements including policies, standards, delegations of authority, and audit and risk management processes and structures including organisation structures, business processes, Code of Ethics, and position descriptions and employee responsibilities are to incorporate compliance objectives.

Maintenance of Ethical Standards

GPM is committed to maintaining high ethical standards through:

- participation and involvement of all employees in the development and review of GPM's Code of Ethics;
- development of other policies and procedures and informing staff and contractors of their requirement to comply;
- encouraging and supporting employees to report incidents of fraud, corruption, maladministration and serious and substantial waste;
- on-going communication around avenues to report suspected inappropriate activities; and
- on-going monitoring of instances reported and controls activities that service to mitigate the risk of fraud and corruption from occurring.

Reporting Fraud & Corruption

Reports of fraud or corruption should be made following GPM's Public Interest Disclosure (PID) Policy. Options for external reporting are referenced in GPM's Code of Ethics. . GPM will ensure that any person making a complaint will not be victimised as a result of the lodgement of a complaint.

GPM's Chief Executive Officer (CEO) has a legal duty to report to ICAC any matters that he suspects, on reasonable grounds, may involve corrupt conduct including fraud.

GPM's will notify the NSW Police in circumstances where criminal offences are suspected.

Reports of fraud or corruption are to be fully investigated as outlined in the Public Interest Disclosure Policy.

Key Regulatory Compliance Risk Analysis

GPM's key regulatory compliance risks predominantly relate to its legal obligations in the areas of, Work Health and Safety, Environmental, Trade Practices, and Fraud Prevention ("Key Risk Areas").

GPM has determined that non-compliance in any Key Risk Areas could expose GPM and its employees to significant liability.

Legal risk analysis is to be managed as a dynamic process within GPM, that is, the analysis is to be undertaken on a regular basis and as required to address a new requirement.

The results of GPM's legal risk analysis are to be periodically reviewed by GPM's lawyers or other independent party to ensure these are both comprehensive and accurate.

Each Regulatory Instrument is to be reviewed by the Chief Executive Officer (CEO) who is responsible for nominating the employees within GPM affected by that instrument. Those employees are responsible for developing a compliance plan for that instrument ("Compliance Plan").

Compliance Plans are to include a summary of the instrument and how it impacts on GPM's operations;

Which Employee(s) it impacts on;

- The rights, entitlements, obligations and responsibilities that apply to GPM;
- The compliance risks associated with that instrument;

- Processes and procedures developed to control or mitigate these risks;
- Accountability and reporting; and
- Record keeping.

Standards, Procedures & Policies

Each of GPM's employees are to prepare and maintain relevant standards, policies and procedures which relate to the business responsibilities of that employee. These are to be regularly reviewed and updated as appropriate to address relevant Compliance Obligations for each Employee.

Monitoring, Supervision, Reporting & Rectification

GPM's Compliance Management System is built on having a small number of staff who are subject matter experts with wide senior management experience. This is supplemented by having periodic reviews by expert advisors who review GPM's approach to ensuring compliance with various areas of obligation and propose best practice systems to ensure compliance is maintained. These reviews prompt a process of continuous improvement.

At the strategic level the Chief Executive Officer (CEO) reviews operations hierarchically and cross-sectionally so as to identify and remedy any organisation-wide compliance issues, such as systemic or culture issues and otherwise evolve GPM's operations into more effective systems.

Compliance Analysis & Continuous Improvement

GPM is to regularly analyse the effectiveness of its compliance activities and use this information to improve the processes that make up the CMS including:

- (a) the Chief Executive Officer (CEO) monitoring and assessing whether GPM is performing its day-to-day operations in accordance with its Compliance Obligations,
- (b) each Employee promoting awareness regarding the importance of and effective compliance within their position, and
- (c) management and staff should periodically identify relevant training to be undertaken that is relevant to their individual duties.

Breaches & Complaints

Any employee who becomes aware of or suspects any breach of law or this policy should alert the Company Secretary. The identity of an employee reporting such conduct will be kept confidential insofar as it is permitted by law.

Any employee who has any queries, concerns, or suggestions about matters covered by this policy should speak to the Chief Executive Officer (CEO) or the Company Secretary.

Updates

These Policy and Procedures are updated on a two-yearly basis. Any material changes to these Policy and Procedures will be advised to staff by management either via Email or at our regular Staff meetings.

When you see an opportunity to improve a procedure kindly make the suggestion known to the Chief Executive Officer (CEO) as we all have a responsibility to improve our standards, individually and as a Company.

Definitions:

Fraud:

Dishonest activity causing actual or potential financial loss to GPM including the theft of money, or other property, by employees or people external to GPM. This also includes the deliberate falsification, concealment, destruction, or use of documentation used or intended to use for normal business use.

Corruption:

Dishonest activity in which a director, manager, employee, or contractor of GPM acts contrary to the interests of GPM and abuses their position of trust in order to achieve some personal gain or advantage for themselves or for another person or entity.

Corrupt conduct is also defined in Sections 7, 8 and 9 of the Independent Commission Against Corruption Act 1988. That definition is specifically couched in terms of a public official and requires the conduct could constitute or involve criminal or disciplinary offence, or there are reasonable grounds for dismissing, dispensing with the services of, or otherwise terminating the services of an employee.

Review:

This document will be subject to review every 2 years or as required to meet GPM's business requirements. Regular internal audits will also be conducted.

Authorised by:



David Wood

Chief Executive Officer