



Policy Name:	Integrity Policy
Attention:	LSH Group Australia Employees
Version:	1.0
Last Reviewed:	1 st April 2026
Effective From:	1 st April 2026
Approved By:	GCEO / Corporate Review / MD

Integrity Policy

1. Purpose

LSH Group Australia ("LSH Group" or the "Company") is committed to conducting business with honesty, integrity and professionalism in accordance with all applicable laws and ethical standards.

This Policy outlines the behavioural and ethical expectations for all Directors and Employees.

2. Scope

This Policy applies to all Directors, officers and Employees across the Group.

3. Standards of Conduct

All Employees must:

- Act honestly, ethically and with integrity
- Comply with all applicable laws and policies
- Treat all stakeholders with respect and professionalism
- Act in the best interests of the Group

4. Compliance with Laws

Employees must comply with all applicable legislation, including:

- *Fair Work Act 2009 (Cth)*
- *Competition and Consumer Act 2010 (Cth)*
- *Criminal Code Act 1995 (Cth)*
- *Privacy Act 1988 (Cth)*
- Work Health and Safety laws

5. Business Conduct and Fair Dealing

The Group is committed to fair, honest and ethical business practices. Directors and Employees must act in good faith, deal fairly with stakeholders and avoid misleading or deceptive conduct.

6. Competition and Consumer Law



The Group complies with the *Competition and Consumer Act 2010 (Cth)*. Anti-competitive conduct, including price fixing, market sharing or cartel behaviour, is strictly prohibited. Employees must not discuss sensitive commercial information with competitors without prior legal advice.

7. Anti-Bribery and Anti-Corruption

The Group has zero tolerance for bribery and corruption. Directors and Employees must comply with the *Criminal Code Act 1995 (Cth)* and all applicable anti-bribery and corruption laws.

No Employee may offer, give, solicit or accept any benefit intended to improperly influence a decision or action. This applies to dealings with both public officials and private sector counterparts.

Third parties acting on behalf of the Group must be subject to appropriate due diligence and contractual protections.

8. Customer Relationships

Employees must act honestly and professionally in all dealings with customers. Misrepresentation, concealment of material facts or unfair practices are prohibited.

9. Gifts and Entertainment

Gifts and entertainment must be reasonable, infrequent, transparent and consistent with Australian law and this Code. Cash or cash-equivalent gifts are generally prohibited.

Employees must not solicit gifts or benefits and must decline or report any offer that could give rise to a real or perceived conflict of interest. All gifts and entertainment must be recorded in accordance with Group procedures.

10. Protection and Use of Company Property and Technology

Company property, including information systems and intellectual property, must be used responsibly and for legitimate business purposes. Use of Company technology is subject to monitoring in accordance with applicable laws.

11. Compliance with Laws and Fair Employment Practices

The Group complies with all applicable employment, discrimination and work health and safety laws, including the *Fair Work Act 2009 (Cth)* and State and Territory WHS legislation.

The Group is committed to equal opportunity, diversity, inclusion and a workplace free from bullying, harassment and discrimination.

12. Reporting and Whistleblower Protections

Employees are encouraged to report suspected misconduct. Reports may be made through managers, HR, the Group Compliance Officer, or the Compliance Hotline.

Employees may report violations of this Code and other illegal or unethical behaviour to:

- their manager or supervisor;



- the site Dealer Principal;
- the Group Compliance Officer / Shanan Asri, shanan.asri@lsh.com
- the Compliance Hotline, compliance.report@lsh.com ;
- the Company's HR Department; or
- other contacts designated by the Company's Board of Directors / Managing Director.

The Group supports and complies with whistleblower protections under the *Corporations Act 2001 (Cth)*. Victimisation of individuals who raise concerns in good faith is prohibited.

13. Psychosocial Hazards (NSW, VIC & QLD Compliance)

LSH Group is committed to providing a safe, respectful and psychologically healthy workplace in accordance with:

- *Work Health and Safety Act 2011* (NSW & QLD) and associated Regulations and Codes of Practice; and
- *Occupational Health and Safety Act 2004* (VIC) and associated Regulations.

The Group recognises its primary duty of care to eliminate psychosocial risks so far as is reasonably practicable, or where elimination is not possible, to minimise those risks.

13.1 Psychosocial hazards

Psychosocial hazards are aspects of work design, management or environment that may cause psychological or physical harm. These include, but are not limited to:

- excessive, unreasonable or sustained workload or time pressures;
- bullying, harassment, discrimination or workplace conflict;
- lack of role clarity, support or fairness;
- exposure to traumatic events or distressing material;
- remote or isolated work without adequate supervision or support;
- poor organisational change management or unsafe workplace cultures.

13.2 Responsibilities

- **The Company** will identify, assess and control psychosocial risks, consult with Employees and Health and Safety Representatives (where applicable), and review controls regularly.
- **Managers and supervisors** must model respectful behaviour, monitor workloads, address issues promptly and escalate concerns.
- **Employees** must take reasonable care for their own health and safety and that of others, comply with reasonable instructions, and report psychosocial hazards and incidents.

No Employee will be subjected to adverse action for raising WHS or psychosocial safety concerns in good faith.

14. Disciplinary Action

Breaches of this Policy may result in disciplinary action, up to and including termination of employment, and may also expose individuals to civil or criminal liability.



15. Policy Governance and Consistency

This Code operates alongside, and must be read in conjunction with, the following Group policies:

- Bullying and Harassment Policy;
- Internet, Email and Computer Usage Policy;
- Privacy Policy;
- Whistleblower Policy.

Where an inconsistency arises, the policy that provides the higher standard of compliance or protection will prevail, subject to applicable law.

16. Policy Review

This policy will be reviewed at least every 12 months, or earlier if required due to legislative or operational changes.

17. Policy Status

This Policy does not form part of any employee's contract of employment. It is a lawful and reasonable direction of the Company with which compliance is required. Any statement in this Policy about what the Company will or will not do does not create a legally binding obligation on the Company.

This Policy may be amended from time to time to reflect changes in legislation, regulatory requirements or organisational needs.