



CONTRACTUAL AGREEMENT CODE OF CONDUCT (T&Cs)

We Always Do The Right Thing For Our Clients, Our Team, Our Network of Members & Investors, Our Affiliated Celebrities & Global Ambassadors, Boardmembers & Also, For The Protection of Our Collective IP: Premium Brands, Products & Services, In Conjunction With Trademark: Violeta Bec

Strong Customer-Client Trust

Helps our Marketing & Investment Services team to attract and retain our customer marketplace, maintain a reputation for providing valuable IP Products & Services and consistently across the Australian Marketplace.

A Breach of Customer-Client Trust

Can result in harmful business consequences that can have a lasting effect and take years to recover from.

Growing Trust with Our Customers-Clients

By always respecting the trust customers place in us and through demonstrating that we are doing everything possible to protect the Data of our customers and Team members,

Acceptable Use of Information & System Policy

The word "Policy" applies to any Employee, Board members, Investor & or Member, affiliated Business Clients, Third Party affiliated members, who are associated with the Violeta Bec Trademark and also, with both our Trading & Holding Companies.

This includes where affiliated persons are both working remotely from home and also, whilst travelling & when overseas.

It Is Your Responsibility In This Contractual Agreement to:

Read The Policy

Make sure that you have read this Policy and if there is anything that you don't understand, please contact our Sydney HQ Office for more information and assistance.

Agree to The Policy

You must acknowledge that you understand and agree to abide by the responsibilities set out in this Policy. This also include any Direct Reports affiliated with entities in conjunction with our Investors & Members, Business Clients, Celebrity & Global Ambassadors and our affiliated Third-Party business services & providers.

Follow the Policy

All persons affiliated with our Brands, Trademark & Patented Business & Affiliated Clients & employees, are responsible for their own security and behaviours and also must abide by the **Enterprise Cyber Security Policy**.

Protecting Trademark Violeta Becs' IP-Data, Patents & Information – Affiliated With Our Trading & Or Holding Companies [Under our Contractual-Agreement Terms & Conditions]

Protecting business information from misuse and loss is also your responsibility, where the following needs to be ensured by YOU:

1. Only collect, use, retain, store and disclose any collective Data & Information, that is required for your role, material created sent, received, copied or stored on behalf of or even with respect to our Trademark Violeta Bec & affiliated operational entities (being Trading & Holding Company), as it remains our subject Trademark & Patented property.
2. Protect our Data & Information subject to 3 classifications being: Public, Internal & Sensitive information (Information Handling & Protection)
3. Never send or store any Sensitive information such as credit card numbers, unless it is part of an authorized business process or activity that is compliant with **Payment Card Industry (PCI) Standards**.
4. Never send or store any Sensitive Information such as PINs or CVVs by any form.
5. Never disclose any sensitive information to unauthorized individuals.
6. Physically secure hard copies of sensitive information when unattended.
7. Protect any customer-client information from misuse, such as any customer-client information, for the purpose for which it was collected and also, any loss.
8. Ensure whiteboards and presentation aids are erased at workplaces, or secured at the end of any meeting, where such items like Trademark & Patent IP-Data & Information gets discussed etc.

Using Email & Internet Safely

Protecting business information from misuse and loss is also your responsibility, where the following needs to be ensured by YOU:

1. Do not click on a links in suspicious emails and immediately report these incidences to the IT Service Desk and especially, if these emails are from an unknown source.
2. Immediately Report any suspicious emails to your own company: IT Service Desk & Teams.
3. Do not use OUR BAM@violetabec.com.au email and YOUR own company emails, for the following purposes:
 - i) Conducting any related commercial activities, not approved in the Contractual Agreement.
 - ii) Creation or distribution of 'junk' or 'chain' mail
 - iii) Subscribe to any non-business related services (for example, Drop Box, Pokemon-Go, .. etc.)
4. Never leak any sensitive information between corporate and personal Gmail accounts, from any device.
5. Do not use our Trademark Premium Brands, Logos &/ Labels plus any Patent information or details, on the Internet for either: Accessing, creating, downloading, retrieving, sending and forwarding material that is: Illegal, Pornographic, Negative material that depicts - race, sex, or religion, derogatory or slanderous material or even material in breach of copyright.

6. Never perform any action using any of our IP: Data, Patents, Information, Brands & Logos over the Internet, which could bring the Violeta Bec Trademark or any of its affiliated companies and or our reputation into dispute.

7. Always ensure to promote Trademark: Violeta Bec or any of our Trademarked Premium & Collective Brands, Logos and or Patents, in a positive light across any social media and or other internet-based platforms into the future.

Manage Systems & Information Access

Never share your logon account details or passwords with anyone else & regularly change the passwords you use to access our Contractual-Agreement, systems and IP: Information.

YOU Must ensure to:

1. Implement strong password controls on all devices which access systems and information, which is affiliated with our Trademark: Violeta Bec and or collection of Patents.

Secure passwords are ones that include no less than 8 characters, a combination of letters, numbers and symbols and you should avoid using personal information such as: first name, last name and date of birth.

2. Do not use the same passwords for all systems and consider using a password manager such as: LastPass for example.

3. Do not write down any passwords on paper or electronically save passwords, where other team members or even others can find them.

4. Change passwords every 30 days for those accounts which access sensitive information such as: credit card details, business sensitive details, including any financial information details.

5. Close, lock your screen or your application access when your device (Computer, Laptop, I-Pad, Mobile) is not in use.

6. Disable access to computer and office system accounts, when Direct Reports leave your company (who may be affiliated with our Contractual Agreement), or even when a job role changes-which no longer requires the same entitlements.

Secure Your Devices

Ensure that your workplace devices comply with your Computer & Internet Policy Standards & Usage Guidelines & All Times.

It Is YOUR Responsibility to ensure:

1. Install only approved applications across all your own Company owned electronic devices.

2. Ensure that you have all the latest downloaded operating system/malicious software detection, is installed across all your devices before connecting to the Violeta Bec network & emails.

3. Immediately switch off your device and contact your IT Service Desk, if malicious software has been found on equipment containing Violeta Bec – IP affiliated Data & Information details.

4. Secure your IT-Equipment at all times, such as: I-Pads, Laptops, Desktops, Custom-Tablet Devices, Mobile Phones.
5. Never use removable media such as: USBs or SD Cards and Mobile devices, to store sensitive information.
6. Never leave USB keys or mobile devices unattended.
7. Contact your IT Service Desk Team for guidelines about keeping devices safe, prior to travelling overseas on business.
8. Ensure any Third-Party and Computer equipment is not connected to our Violeta Bec systems network.
9. Immediately report any of your devices as either lost or stolen, to your Line Managers & also your IT Departments.

Record Keeping Policy

Trademark Violeta Bec & all affiliated entities, are committed to operating responsibly and in accordance with Australian Government Legislation & accounting principles.

This means that WE (and YOU) should always:

1. Make sure our financial records, people-records and systems are accurate and secure.
2. Ensure that our financial transactions and funds need to be recorded correctly and are supported by proper paperwork, so they can be audited reliably and reported honestly.
3. Do not falsify any documents, or any information given to external parties including the government or regulators, as this is strictly unacceptable & under our terms of agreement.
4. Not deliberately keep or help another team member help to keep records that intentionally mislead or hide the true nature of a transaction.
5. Ensure no Off Book transactions are made and in conjunction with our joint Contractual-Agreement, as this is Illegal Practice and is strictly prohibited.

Respectful Workplace Policy

Trademark Violeta Bec & all its affiliated entities and staff, are committed to operating responsibly and respectfully and in accordance with Australian Government Legislation.

This means that WE (and YOU) should always adhere to the T&Cs concerning:

Violence, is not acceptable in any workplace and can include

1. Punching, Pushing, Fighting or other Physical Evidence
2. Threats of Violence.

Victimisation, means treating someone negatively because they have made or have been involved in a complaint. At our Workplace, we encourage our team members to speak up when something is not right and victimization is not okay and such examples of this type of behaviour includes:

1. Making derogatory comments.
2. Ignoring a team member, or otherwise creating a hostile work environment.
3. Not rostering a team member for work shifts.

Unlawful-Discrimination, is when someone is treated less favourably and because of a legally protected attribute such as:

1. Gender, Marital or Relationship Status, Pregnancy, Breastfeeding, Parental Status or Carers' or Family Responsibilities.
2. Sexual Orientation, Gender Identity, Intersex Status or Gender Expression.
3. Race, Colour, Descent, Nationality, National Origin, Ethnicity or Religion.
4. Disability, Impairment or Age.

Sexual Harassment, is unwanted, un-welcome or unreciprocated conduct or behaviour of a sexual nature, which offends, humiliates, or intimidates, where examples include such behaviour like:

1. Sending, Showing or Requesting Sexual Pictures or Messages (Including by phone or on social media).
2. Unwelcome Comments or Questions About a Person's Appearance, Sexual Activities or Private Life.
3. Unwelcome Physical Contact, Such as Shoulder Massages, Invading Someone's Personal Space, Pinching or Kissing.
4. Unwelcome Non-Physical Contact, Such as Staring or Leering in a Sexual Manner.
5. Persistently Asking Someone on A Date, After Previous Refusals.
6. Unwanted Sexual Propositions.

Harassment, is any uninvited, unwelcome or unreciprocated behaviour that a reasonable person would anticipate may humiliate, offend, embarrass or intimidate another person, where examples include such behaviour like:

1. Offensive or Demeaning Comments or Jokes.
2. Sending or Showing Offensive Pictures or Messages Including by phone or on social media).
3. Mimicking Someone's Accent or Habits.
4. Unwelcome Comments or Questions About a Person's Appearance, Sexual Activities or Private Life.

Bullying, is any repeated, unreasonable haviour directed towards a person, or group of people, which could pose a risk to their health and safety. Bullying may be intentional or unintentional, where examples include such behaviour like:

1. Abusive, Insulting or Offensive Language or Comments.
2. Spreading Misinformation or Rumours.
3. Behaviour which Belittles or Humiliates.
4. Making Threats or Intimidation.

Follow This Policy

Information Handling & Protection

This Policy applies to the security of our mutual information & data and the information of the information and data and all your affiliated customers., for which we have a trusted responsibility for maintaining

Information classification is used across our operations, which showcases the level of sensitivity of all information and hence, determines the extent to which information should be controlled and secured as it is being accessed, created, amended, stored or even transmitted. Accordingly, Data & Information must be handled and protected and in accordance with the following 3 classifications being:

1. Public Information (eg. Press & Media Releases & Approved Advertising Brochures).
2. Internal Information – not approved for sharing (eg. Customer information, Internal Communications or Commercial Information).
3. Sensitive Information – authorized access information belonging to customers (eg. Credit Card Details, Tax File Number or even Company Financial Information).

The misuse or loss of any Sensitive and or Internal Company information may have legal and regulatory implications for all entities, individuals & Third Parties, who are directly or indirectly affiliated as part of these Contractual-Agreement Terms & Conditions.

Information Handling & Protection

In conjunction with this Policy, ensure that you read, have understood and agree with the **Violeta Bec, Australia Trademark - Code of Conduct & Internet and Cyber Policies.**

Exception

There will be some specific IT roles in your Company, where some roles will be authorized to perform duties that would otherwise breach our Policies. Through your companies, only these individual roles are to only have our mutual approval for performing various duties and in collaboration under the grounds of our Contractual-Agreement, to perform any duties within their limits of their role, via the **Acceptable Use & Privileged Accounts Policy.**

Non-Compliance

Non-compliance is an action that is contrary to the information security principles, policies, standards, guidelines or operational procedures.

Any Non-Compliance of this Policy may result in Disciplinary Action, including Dismissal and or Legal Action at the Discretion of our Trademark & Owner.

Any suspected breach or non-compliance of this Policy must be promptly reported to any Line Managers, HR Department and also to the Cyber Security Team.

Any affiliated parties (Including entities and officeholders, in conjunction with this Contractual-Agreement), should have no expectation of Personal Privacy when using our Trademark IP: Data & affiliated Information & Patents, as Violeta Bec T/as - Business Acumen Management Pty Ltd reserves the right to be able to monitor & inspect any material, which has been created, sent, received or stored, to ensure compliance with our Policies and thus, prevent any inappropriate use.

We also reserve the right to block any internet sites in collaboration with the Australian Government, which are deemed as unacceptable, unproductive or present risks to our Trademark Violeta Bec, our Information and Systems and last but not least, our valued employee team members.

Policy Changes & Updates

This Policy may be amended or replaced at any time at the absolute discretion of the Director of Business Acumen Management Pty Ltd or any of its authorised Officeholder Delegates.

It is the mutual responsibility for all members in conjunction with this mutual Contractual-Agreement, that all parties keep up to date with any Policy updates and changes.