

# Commitments & Policies

Page Seager is committed to achieving high operational and ethical compliance standards in the following areas:

## Data security

- (a) Data security is a strategic business matter for Page Seager, it is not a technical issue outsourced to the IT department.
- (b) Protecting our clients' data is paramount and central to all decisions associated with IT systems and physical premises.
- (c) We are committed to protecting our business from all forms of cyber security threats and implementing controls which aim to protect client data and personal information against theft, abuse, and other forms of harm or loss.
- (d) We have an external cyber security specialist firm undertake penetration testing on an annual basis to identify where we can improve our controls and mitigate threats.
- (e) We have strict confidentiality obligations arising from all client engagements, regulatory requirements, professional conduct obligations, and employment contracts.
- (f) Upon commencement with the firm, all employees sign a confidentiality undertaking in their employment agreement.
- (g) When performing work for a client, we disclose confidential information to employees by adopting the principals of 'need-to-know' and 'least privilege' as required, in order to perform the work for the client.
- (h) We have developed and maintain detailed documentation which are the core of our approach to cyber security. They cover leadership & governance, human factors, operational technology & procedures, business continuity, risk, and legal & compliance.
- (i) We benchmark ourselves against the Australian Government's, Australian Cyber Security Centre Essential Eight, maturity level two.

## Privacy

- (a) Page Seager is committed to respecting our clients' privacy. We protect personal information in accordance with the obligations under the *Privacy Act 1988* (Cth) (**Privacy Act**), including the Australian Privacy Principles (**APPs**).
- (b) More information on how we collect, use, store and disclose personal information can be found in our Privacy Policy, which are available on our website (link copied below).

– **Privacy Policy**

## Data retention and destruction

(a) Page Seager will not retain data indefinitely. We will take all reasonable steps to destroy or de-identify information when it is no longer required for any purpose for which it may be used or disclosed under the Privacy Act and we do not otherwise need to retain the information under Australian law.

(b) We will only keep information that is reasonably necessary for Page Seager's business functions or to comply with our legal obligations. In respect to client, trust and other records our approach is as follows:

(i) Client files:

We will take all reasonable steps to destroy or de-identify information when it is no longer required for any purpose for which it may be used or disclosed under the Privacy Act.

This means that in general we will destroy or de-identify client information contained within client files, 7 years after the end of a matter unless we are required by law to keep information contained within the file for a longer period or we otherwise need to retain the information in the file for purposes for which we are permitted to use such information in accordance with the Privacy Act.

(ii) Client details:

A record must be kept of the following client details for a period of 7 years after the finalisation of a matter in accordance with rules 24 and 56 of the *Legal Profession Regulations 2018* (Tas). This record includes the following details:

- Client name
- Address
- Matter reference / file number
- Matter description

(iii) Trust records:

Trust records must be retained for a period of **7 years** after the last transaction entry or the finalisation of the matter, in accordance with rule 55 of the *Legal Profession Regulations 2018* (Tas).

(iv) Intellectual Property records:

As a matter of best practice, records of intellectual property rights may be retained for the duration of the right's existence:

- Patent: 20 years – section 67 *Patents Act 1990* (Cth)
- Trade mark: 10 years – section 72 *Trade Marks Act 1995* (Cth)
- Copyright: 70 years following the death of the author – section 33 *Copyright Act 1968* (Cth)

These standard timeframes may be subject to exceptions, extension or renewal.

(v) Commonwealth and State records:

Commonwealth and State records must not be destroyed, disposed, damaged or altered unless required by law or approved by the relevant Archivist and their procedures. This is in accordance with sections 24 and 26 of the *Archives Act 1983* (Cth) and section 20 of the *Archives Act 1983* (Tas).

(vi) Documents required for court proceedings:

We may be required to retain documents for the use in court proceedings or to comply with a court order.

## Code of conduct, values and workplace behaviour

- (a) At Page Seager we have a Code of Conduct Policy that:
- (i) aims to provide an ethical framework for our decisions, standards, performance and behaviour;
  - (ii) outlines the minimum standards of behaviour expected at all times relevant to our work and responsibilities;
  - (iii) exists to encourage a positive organisational culture that will result in a safe and healthy work environment for everyone;
  - (iv) operates in conjunction with the legal and regulatory requirements of Federal and State laws and Page Seager's policies, procedures and rules; and
  - (v) confirms we are ultimately all responsible for our own behaviour.
- (b) Our values:
- (i) set the standard for our behaviour and the way we conduct our business activities;
  - (ii) relate to every aspect of our work, from the relationships we build with our clients and colleagues, to the way in which we conduct ourselves on a daily basis;
  - (iii) outline our standard of conduct towards clients, colleagues and the community; and
  - (iv) strengthens our reputation and maintains the expectations of our clients and colleagues.
- (c) Our shared values are:
- (i) **integrity** - we will interact with other employees and others in our workplace in an open, honest and ethical manner to create an environment based on mutual respect and trust;
  - (ii) **teamwork** - we will work collaboratively to achieve the best outcomes for Page Seager, its clients and the community;
  - (iii) **service excellence** - we will provide an efficient and professional service to clients;
  - (iv) **continuous improvement** - we will encourage and support each other to improve the quality and efficiency of our work, our systems and our assets; and
  - (v) **safety** - we will ensure safety is entrenched in everything we do.
- (d) We are also committed to a workplace that is free from any form of inappropriate workplace behaviour. Our Workplace Behaviour Policy seeks to:
- (i) communicate our intention to take all reasonable steps to ensure that employees and other persons at the workplace understand their obligations and do not engage in discrimination, harassment, bullying, sexual harassment, victimisation, vilification or inappropriate behaviour;
  - (ii) demonstrate our commitment to ensuring that the principles of equity and equal opportunity are reflected in our policies and procedures that relate to employees and their employment;
  - (iii) confirm that we will not tolerate discrimination, harassment, bullying, sexual harassment, victimisation, vilification or inappropriate behaviour in the workplace; and
  - (iv) confirm behaviour or conduct which is determined to be discrimination, harassment, bullying, sexual harassment, victimisation or vilification will be a breach of the policy, and if it also breaches the applicable legislations will be against the law and may subject the individual to fines, penalties and potentially imprisonment.

## Family and domestic violence

### Overview

- (a) Page Seager recognises that our clients and employees may be exposed to family and domestic violence (**FDV**). We are committed to actively supporting clients and employees that may be affected by FDV. A key priority of the Page Seager's FDV policy is to ensure all clients and employees affected by FDV are provided safe, supportive and flexible assistance and all interactions are undertaken in a respectful and sensitive manner.
- (b) We also recognise that any person can be affected by FDV and that the impact of violence is not restricted only to private life as its impacts can extend to the workplace as well.
- (c) We are committed to providing a healthy and safe working environment for all employees and recognise that employees sometimes face difficult situations in their work and personal life, such as FDV that may affect their attendance, performance at work or safety.
- (d) We are also committed to making Page Seager a great place to work and making a significant difference to employees affected by FDV by providing appropriate safety and support measures.
- (e) Family violence is more than physical violence and also includes:
  - (i) economic abuse;
  - (ii) emotional abuse;
  - (iii) intimidation;
  - (iv) breaching any existing orders relating to family violence; and
  - (v) property damage.
- (f) It is important to recognise that economic or financial abuse is one of the most powerful ways a perpetrator can keep their partner or family member trapped in an abusive relationship and may also impact on that person's ability to stay safe once they leave the relationship.

### Our Commitment

Page Seager's commitment in relation to FDV covers three broad groups:

- (a) Clients:
  - (i) We have strict confidentiality obligations arising from all client engagements, regulatory requirements and professional conduct obligations.
  - (ii) All conversations are confidential and access to confidential information will be provided only with the client's written consent.
  - (iii) Where a FDV issue arises, we will work with clients to identify a safe and practicable method of communicating with or providing information to them.
  - (iv) At all times clients will be treated with understanding and respect, engaged in a respectful and sensitive manner, and provided with safe, supportive and flexible assistance.
  - (v) We are able to assist with referring clients to external support services.
- (b) Employees:
  - (i) Page Seager maintains a supportive work environment for employees who can feel comfortable requesting assistance for FDV related concerns. We all have an important role to play in creating and maintaining this environment.
  - (ii) Consistent with our Workplace Behaviour Policy, employees will not be victimised or otherwise subjected to detrimental action as a consequence of that person raising, providing information about, or otherwise being involved in the support for an individual experiencing FDV.

- (iii) Any disclosure to Page Seager or request for support made by an employee who is experiencing FDV will be dealt with in the strictest of confidence, including any personal information that is provided by the employee.
- (iv) The support Page Seager offers to employees affected by FDV will be tailored according to their needs and circumstances, but may include:
  - (A) assistance in accessing support services;
  - (B) access to leave arrangements as set out in our Workplace Manual;
  - (C) access to flexible working arrangements;
  - (D) support for implementing security and privacy measures at work, including a safety plan designed in conjunction with Page Seager's WH&S personnel; and
  - (E) any other supports, measures or adjustments that are appropriate and able to be offered by Page Seager in the circumstances.
- (c) Communities:
  - (i) Page Seager through its staff committee promotes measures to reduce FDV in the community via:
    - (A) participation in internal or external events which raise awareness of FDV; and
    - (B) supporting organisations (donations or in kind) which directly or indirectly assist people affected by FDV.

## Anti-bribery and corruption

- (a) Page Seager is committed to conducting business in an honest, fair and transparent manner.
- (b) Our Code of Conduct Policy sets clear behavioural expectations, including:
  - (i) we do not take improper advantage of our positions in order to obtain a benefit for others or ourselves;
  - (ii) we conduct ourselves in an unprejudiced, objective and efficient manner, considering matters on their merits without regard to outside influences or personal interests;
  - (iii) we do not engage in any corrupt conduct;
  - (iv) we do not participate in activities that may result in inappropriate personal gain;
  - (v) we do not participate in outside business activities that could affect or compromise our ability to perform our duties or lead to an appearance of such; and
  - (vi) we do not solicit, accept or offer money, gifts, favours or entertainment that might influence, or appear to influence our judgment.
- (c) We engage and pay suppliers only for legitimate goods and services.
- (d) We have segregation of duties across all financial processes and tasks and adopt financial practices that prevent the establishment of secret accounts, or the creation of 'dummy' documents that do not represent legitimate transactions.

## Money laundering and terrorism funding

- (a) We are committed to the highest standards of ethics, integrity, and compliance with all relevant laws and regulations, including those aimed at preventing money laundering and terrorist financing.
- (b) We act consistently with applicable Anti-Money Laundering and Counter-Terrorism Financing laws and regulations in Australia, and we will not knowingly engage in or be associated with money laundering in any form.

- (c) Whilst Page Seager is not currently a reporting entity under the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006* (Cth) we are subject to stringent requirements prescribed by the regulatory regime of the legal profession legislation and rules of professional conduct, for example in relation to the handling of cash transactions.
- (d) From 1 July 2026, this will change with the law being extended to include certain services provided by lawyers and therefore Page Seager will be regulated under the Act. We are well progressed in respect to our future obligations, including:
  - (i) the appointment of a Compliance Officer (our Chief Operating Officer);
  - (ii) the appointment of an external consultant to assist in the development of a compliance program, risk assessment and initial staff training;
  - (iii) a commitment to an ongoing support and training program post 1 July 2026, with the external consultant mentioned above. This will cover areas such as ongoing training, annual compliance program and risk assessment updates and preparation for AUSTRAC reviews and audits;
  - (iv) the selection of a software solution that will assist in performing the required customer due diligence when onboarding clients; and
  - (v) the identification of internal resources dedicated to undertaking the day-to-day AML/CTF compliance tasks.

## Modern slavery

- (a) We have a zero-tolerance approach to modern slavery in any form, within our business, in all our business dealings and in our supply chain.
- (b) Whilst Page Seager is not required to report under the *Modern Slavery Act 2018* (Cth), we are committed to conducting our business in an ethical and responsible manner and we act consistently with the responsibilities under the Act to take actions to prevent and address modern slavery within our operations and supply chain.
- (c) Page Seager Pty Ltd is an Australian Private Company which operates solely from Tasmania, Australia and therefore we do not have operations in high-risk locations.
- (d) Our workforce comprises approximately 70 people that all operate from our Hobart office in Tasmania. We do not procure any labour resources outside of this workforce, meaning that we do not acquire labour resources outside of our Tasmanian operations, nor do we have any contract labour resources. Given the nature of the services we provide and the professional workforce we employ, we assess the risk of modern slavery or human trafficking to be low.
- (e) Outside of our workforce, the largest supplier spend falls into the following categories:
  - (i) Premises rent;
  - (ii) Insurances;
  - (iii) Online searches (primarily property related searches);
  - (iv) IT services (primarily software as a service);
  - (v) Online library services; and
  - (vi) Office supplies.
- (f) We regularly review our supply chain and our approach to selecting suppliers is to 'buy local' wherever possible, starting with buying within Tasmania and if this is not achievable, buying within Australia. We also undertake informal due diligence on new suppliers prior to them being approved as a supplier to the business. The due diligence process considers a number of factors such as quality, cost, fit for purpose, reliability, range and origin. Where we have any concerns regarding a supplier we will not deal with them.

## Social responsibility

- (a) Page Seager is committed to fostering a workplace that is welcoming and inclusive. We celebrate each other's differences, knowing that a diversity of backgrounds, sexual orientations, gender identities and ages expands and deepens our perspectives. We recognize that diversity is our strength. By fostering equity, we ensure that everyone has equal access to opportunities, resources, and support. Together, we strive to create a workplace that celebrates differences, dismantles barriers, and champions fairness for all.
- (b) Page Seager supports diversity, equality and inclusion in the workplace through our Workplace Behaviour Policy which specifies a commitment to the principle of equal employment opportunity. The application of equal opportunity (also referred to as the merit principle) means that recruitment, remuneration, promotion and access to training and development is determined on the basis of relevant skills, experience, qualifications, knowledge, aptitude and the potential for future development of the individual. This precludes the consideration of any personal characteristic or attribute that is not directly relevant to the inherent requirements of the job.
- (c) This commitment dovetails into our promotions policy where we explicitly reiterate our commitment to a merit-based approach to promotions and specifically note that a part-time lawyer has exactly the same opportunity under the promotions policy as a full-time lawyer.
- (d) In relation to parental leave, our documented Parental Leave Policy provides equal access to this leave for all employees. Our policy also includes a paid period of leave in addition to any Federal Government scheme which is also available to all staff.
- (e) We are committed to undertaking social procurement where possible. Where we have been able to achieve this is through our supplier Oak Tasmania, a provider of security shredding services. Oak Tasmania is a social enterprise that provides employment opportunities for people living with a disability, whilst also being fully accredited with ISO certification.
- (f) We are committed to managing our business in an environmentally responsible manner, and to care for the environment in which we live and work. We are committed to achieving ongoing environmental sustainability improvements with a focus on areas such as energy efficiency, resource conservation, waste reduction, and carbon footprint reduction. We strive to integrate sustainability considerations into all aspects of our business operations, including office management, procurement, and client service delivery.

Acting in an environmentally responsible manner is demonstrated by our actions in relation to:

### Energy

- (i) Our lighting system (C-Bus) is set to automatically turn off at set intervals each night to reduce energy usage.
- (ii) Airconditioning has a set schedule of operation during our ordinary business hours only, and is turned off outside of these hours each workday, on weekends, public holidays and periods of extended shut down (e.g. Christmas and New Year).
- (iii) Printers and monitors are set to turn off where there is a period of inactivity.
- (iv) Our lighting is energy efficient LED panels.
- (v) 100% of our electricity is renewable via the Tasmanian hydro-electric scheme.

### Resources

- (i) We minimise paper usage by promoting digital documentation and communication via our electronic practice and document management system. When printing is necessary, we prioritise double-sided printing and use recycled or sustainable paper products that are elemental chlorine free.
- (ii) Water is captured and stored onsite in tanks that is then reused across the building in amenity areas.

**Waste**

- (i) We actively work to reduce waste generation by recycling, reusing, and properly disposing of materials.
- (ii) We actively minimise single-use plastic and adopt sustainable alternatives in our office spaces. For example, we have cold water filtration stations that do not have single use cups or involve the use of large plastic drums, instead they are plumbed into the mains water.

Last updated in December 2025.