

Independence, conflicts of interest and ethics

We have well-established systems and procedures to help safeguard the objectivity of our people and the firm, to avoid conflicts of interest and to comply with ethical and other applicable standards. The release of revised ethical standards this year has added to the complexity of these considerations, requiring a constant balance between the straightforward approach outlined in the Deloitte Code and the increasing levels of regulation and professional requirements in this area.

We take these requirements seriously, and adopt an approach that wholeheartedly embraces the spirit as well as the letter of regulation. We are confident that they are demonstrated through the tone set by the leaders of our practice and the behaviour and actions of our people.

Deloitte Code

This practical guide sets out our ethical framework and codifies our ethical principles:

Honesty and integrity – we act with honesty and integrity;

Professional behaviour – we operate within the letter and the spirit of applicable laws;

Competence – we bring appropriate skills and capabilities to every client assignment;

Objectivity – we are objective in forming our professional opinions and the advice we give;

Confidentiality – we respect the confidentiality of information;

Fair business practice – we are committed to fair business practices;

Responsibility to society – we recognise and respect the impact we have on the world around us;

Respect and fair treatment – we treat all our colleagues with respect, courtesy and fairness;

Accountability and decision making – we lead by example using our shared values as our foundation.

Independence and conflicts of interest

We have invested in best-in-class systems to enable us to maintain our independence and avoid conflicts of interest in client assignments. Our firm has a dedicated Compliance, Independence and Ethics Partner, as well as a team of professionals to support our people with their compliance obligations. The Compliance, Independence and Ethics Partner works directly with the Senior Partner and Chief Executive and the Board to set the strategy and priorities for ethics and compliance, and has operational responsibility for our independence, ethics and compliance programme.

Tools and technology

Our engagement take-on, compliance and client database systems are all internally developed and comprise cutting-edge solutions to the complexity of regulatory requirements; the tools are designed to be intuitive to use whilst facilitating compliance, reporting and monitoring. We assess whether potential new engagements are consistent with maintaining independence and managing any potential conflicts of interest, and we monitor partner and staff investments to ensure that we safeguard the independence and objectivity of Deloitte, our people and our engagement teams.

Learning

Our online independence and ethics learning programme is undertaken by everyone in the firm, using real-life examples to translate independence and ethical questions into practical actions. In addition, our helplines allow our people to request information, ask questions or report issues confidentially to senior members of PPG.

Partner rotation

We apply audit partner rotation policies such that audit engagement partners and other key partners involved in audits of our listed public interest clients serve in these roles only for a period of five years and seven years respectively. IRPs for each public interest audit client are also rotated after five years.

Whistle-blowing

PPG provides a whistle-blowing function for all of our people. This policy is fundamental to our professional integrity and reinforces the value that we place on our people being honest and respected members of their individual professions. The policy has the following fundamental elements:

- 1. Protection** – all of our people are protected from victimisation, harassment or disciplinary action as a result of any disclosure made in good faith and not made maliciously or for personal gain.
- 2. Anonymity** – normally our people make disclosures internally and their identity is protected at all stages in any internal matter.
- 3. Encouragement** – the firm encourages those who suspect wrongdoing to report it.

Monitoring

Our internal practice review and other monitoring processes provide us with assurance that these policies are appropriately observed. In addition, the practice review includes an assessment of compliance with DTT independence policies. The results of these internal reviews are included in a report to the DTT Chief Executive Officer and DTT's Board of Directors, and significant issues are discussed in regional meetings of the independence network and considered as further guidance and learning materials are developed.