

ORGANISATIONAL GOVERNANCE

• OVERVIEW

This Corporate Social Responsibility (CSR) framework brings together a range of individual initiatives that Shearwater has developed over time.

At Shearwater, we believe we have a high degree of responsibility not only for the economic consequences of our activities, but also for the social and environmental implications. As such, our CSR framework considers the economic, social and environmental aspects of business activity.

We have developed this framework in alignment with elements from ISO 26000 - Social Responsibility Guidelines. This represents world's best practice when it comes to CSR frameworks.

• ACCOUNTABILITY

An organisation should be accountable for its impacts on society, the economy and the environment.

Accountability can be achieved by conducting due diligence. This is defined as a “comprehensive, proactive process to identify the actual and potential negative social, environmental and economic impacts of an organisation's decisions and activities over the entire life cycle of a project or organisational activity, with the aim of avoiding and mitigating negative impacts”.

Ongoing accountability and adherence to this CSR framework will be achieved through conducting an annual due diligence review. This will help ensure we are continuing to meet the standards and objectives contained herein. This will also provide opportunities for identifying areas for improvement.

• TRANSPARENCY AND DISCLOSURE

An organisation should be transparent in its decisions and activities that impact on society and the environment.

Notwithstanding our obligations to client confidentiality and privacy regulations, Shearwater commits to disclose in a clear and accurate manner, the activities for which we are responsible, including their known and likely impacts on society and the environment.

Such information will be made available on the CSR section of the Shearwater website.

• ETHICAL BEHAVIOUR

An organisation should behave ethically.

Organisational behaviour should be based on values of honesty, equity and integrity. These values imply a concern for people and the environment and a commitment to address the impact of activities and decisions on stakeholders' interests.

Shearwater's Vision, Purpose and Values have been developed to reflect our commitment to ethical business practices.

Our Vision: Be the leading Australian information security firm, solving cyber challenges on a global stage.

Our Purpose: Create a safer connected world

Our Values:

- Act with heart and soul
- Create magical customer experiences
- Take pride, own the outcome
- Speak freely and respectfully
- Have fun, as a team

Shearwater places the highest priority on conducting itself in an ethical manner at all times. We encourage others to adopt similar values to ours through our [Code of Ethical Conduct](#). This CSR framework encompasses and outlines the methods in which we put into effect our commitment to ethical corporate behaviour.

• STAKEHOLDERS

Stakeholders are individuals or groups who are affected by, or have the ability to impact, the organisation's actions. An organisation should respect, consider and respond to the interests of its stakeholders.

Shearwater's stakeholders include:

- Shareholders;
- Employees/Contractors;
- Customers;
- Suppliers;
- Commercial Partners;
- Regulators; and
- Broader Community.

Shearwater recognises and has due regard for the interests, as well as the legal rights, of our stakeholders and we make every effort to respond to their expressed concerns.

We commit to consider the views of stakeholders whose interests are likely to be affected by a decision or activity, even if they have no formal role in the governance of Shearwater or are unaware of these interests.

• RESPECT FOR THE RULE OF LAW

An organisation should accept that respect for the rule of law is mandatory.

Shearwater works closely with regulators and legislators to ensure our operations comply with all required standards.

We are governed by the Australian Federal Government with respect to Privacy, Notifiable Data Breach (NDB), Taxation and Corporate Law. We are also governed by laws within each of the Australian States in which we undertake activities. This includes Work Health and Safety laws, workplace surveillance etc.

Additionally we comply with the requirements of a number of industry entities such as the Payment Card Industry (PCI) council and CREST regarding penetration testing codes of conduct and operating obligations. We have also been certified as ISO 27001 compliant.

• INTERNATIONAL NORMS OF BEHAVIOUR

An organisation should respect international norms of behaviour, while adhering to the principle of respect for the rule of law.

In line with this commitment, we are signatories to the Ten Principles of the United Nations Global Compact on human rights, labour, environment and anti-corruption.

We are committed to making the UN Global Compact and its principles part of the strategy, culture and day-to-day operations of our company, and to engaging in collaborative projects which advance the broader development goals of the United Nations, particularly the Sustainable Development Goals.



United Nations
Global Compact