



# ANTI-SPAM COMMITMENT STATEMENT

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Any person(s) using i24s Group Pty Ltd's (i24s) documents or data accepts the risks of:

- a) using the documents or data in electronic form without requesting and checking them for accuracy against the original hard copy version; and
- b) using the documents or data for any purpose not agreed to in writing by i24s.

## 1 PURPOSE

i24s Group Pty Ltd (“i24s”) (“the Group”) (ABN 74 650 861 402), is a 100 per cent owned and operated Aboriginal business. The Group is a leading provider of talent pipeline/workforce solutions, industrial equipment hire and goods, and outreach and advocacy services, for the Mining, Resources, Energy, Infrastructure and Property sectors.

While i24s wishes to foster a culture of openness, trust, and integrity, this can only be achieved transparency, a thorough understanding of the respective laws and standards, and a robust approach to managing spam.

The purpose of this **Anti-Spam Commitment Statement** (“Statement”) is to provide a framework for i24s to manage, maintain and continuously improve managing communications with all parties, specifically, spam.

The governance of this Policy is overseen by the Group’s Co-Founders and Officers/Executive Directors, Angela and Justin Kickett.

## 2 INTRODUCTION

All i24s entities are committed to providing transparency to outside parties with respect to compliance with Australia’s Anti-Spam Act, in effect as of August 2010, and its relevant rules and regulations about **commercial electronic messages** (“CEMs”), which are messages sent from Australia or accessed in Australia that have as a purpose to encourage participation in a commercial activity.

i24s complies with the rules established by the Australian Communications and Media Authority (ACMA) rules, National Privacy Principles, Australian eMarketing Code of Practice, Internet Industry Code of Practice, Telecommunications Act and Privacy Act, among others.

## 3 PURPOSE

The i24s **Anti-Spam Commitment Statement** (“Statement”) is a formal Statement of rights and obligations which is made available to outside parties who may receive i24s electronic communications. It is intended to inform outside parties of the type of responsible and transparent practices adopted by i24s when sending electronic communications, of who they may contact at i24s for any concern pertaining to electronic communications, and of where/how they may unsubscribe from CEMs received from the Group.

## 4 APPLICATION AND SCOPE

This Statement applies to CEMs sent by the Group from Australia or accessed in Australia by outside parties.

When the following terms are referenced herein, “we”, “our” or “us”, we are referring to everyone at i24s. The scope of this Policy applies to all workplaces which are under the Group’s control.

## 5 STATEMENT

i24s undertook various initiatives to comply with the local governing laws, including the implementation of business procedures, processes and guidelines. In addition to the adoption of this Statement, i24s notably undertook the following initiatives:

**Collection Processes:** The consent of outside parties is necessary in order for i24s to send a CEM. This consent must be “expressed” or “implied” consent, unless the electronic communication is exempt from the rules or its consent requirements. i24s modified consent collection processes to ensure that consent obtained from recipients is in compliance with the respective rules.

**Email Footers:** i24s modified its email footers to manage anti-spam requirements. In particular, CEMs sent from i24s identify i24s as the party sending the CEM, provide a method whereby the recipient can readily contact i24s, such as a mailing address and one of (i) a telephone number with active response voicemail, (ii) an email address, or (iii) a web address.

**Unsubscribe Mechanisms:** CEMs sent from I24S provide a working unsubscribe mechanism (functional for 60 days), which is processed within a maximum of 10 business days after receiving the unsubscribe request. To this effect, i24s incorporated compliant unsubscribe mechanisms into CEM email footers. Recipients may at any time unsubscribe from receiving CEMs from i24s by following the process laid out in the CEM, or by contacting a Co-Founder/Executive Director.

**Guidelines and Training for Employees**

i24s implemented internal guidelines as well as a training program about spam, for all its employees. I24s employees are further required to confirm their awareness of spam requirements and their agreement to abide by this Statement and associated business procedures, processes and policies.

**Receiving Electronic Messages**

The types of electronic messages i24s may send from time to time include the following:

- an electronic message sent to i24s current clients, service providers, business partners, or other persons with whom i24s has a business relationship to carry out its commercial activities;
- an electronic message sent to i24s’ current or potential clients (whether individuals or businesses) by the Group. For example, this may be for prospecting purposes or in order to answer a request for information or an inquiry;
- an electronic message sent to i24s’ current or potential service providers by various I24S business units. For example, i24s may outsource part of its activities to a third party (such as a maintenance company, a translation service provider, etc.);
- an electronic message sent to i24s’ current or potential business partners. For example, i24s has various partnerships with recruitment agencies, strategic partners and preferred partners, etc.;
- an electronic message sent to i24s’ current or potential clients, service providers and business partners to provide information on i24s services. For example, i24s may send newsletters or invitations to events in the context of a current or potential business relationship; and
- an electronic message sent by i24s as part of its recruitment process.

If you received a CEM or other electronic communication from i24s, you may be in a business relationship with the Group, you may have provided express or implied consent to receive CEMs from i24s, or the electronic communication may be exempt from anti-spam rules or its consent requirements.

If you are receiving an electronic communication from i24s, it may be a message that does not qualify as a CEM or is otherwise exempt under anti-spam rules. For instance, a message is not

considered a CEM where it does not have as one of its purposes to encourage the participation in a commercial activity. The electronic message is also exempt if it is one the following:

an electronic message sent to you from a i24s employee with who you have a personal relationship, meaning that you have previously had a direct, voluntary, two-way communication;

- an electronic message sent to you from a i24s employee with who you have a family relationship;
- an electronic message sent within i24s (for e.g., between employees of i24s);
- an electronic message sent between i24s and another business, where there is an ongoing relationship between i24s and this other business;
- an electronic message sent by i24s in response to a request or inquiry; or
- an electronic message sent by i24s in order to enforce a legal right or obligation (for e.g., if there is an outstanding debt, or breached contract).

### **Expressed or Implied Consent**

**Express Consent:** You may have provided your express consent to i24s upon subscribing to receiving an eNewsletter or other CEMs.

**Implied Consent:** The Group may infer your implied consent if:

- i24s has an existing business relationship with you or has a former business relationship with you which terminated less than two years ago (for e.g., if you are a former client);
- The Group received an inquiry from you within the last six months;
- You disclosed your electronic address to i24s (for e.g., you provided your business card to a i24s employee) or you conspicuously published your electronic address (for e.g., via a corporate website or in a brochure) and the CEM is in connection with your business role and function.
- Situations where no consent is required: i24s does not need your consent when sending the following types of CEMs:
  - an electronic message sent once, following a referral by a current i24s client, service provider, business partner or employee who also has a personal or business relationship with you;
  - an electronic message that provides you with a quote or estimate for the supply of a service in answer to a request for a quote or estimate;
  - an electronic message that facilitates, completes or confirms a transaction;
  - an electronic message that provides i24s service warranty, product recall, safety or security information; or
  - an electronic message that provides information about a i24s service purchased (including updates and upgrades) or the ongoing use or ongoing purchase of a i24s service.

### **Existing Business Connections**

A CEM would be regarded as being sent in connection with your business role and function in the following circumstances:

the electronic message was sent to you by i24s to sell its services and you operate a business which may be interested in the i24s specific service promoted.

the electronic message was sent to you by i24s to retain your services and is directly linked to

your business. For example, i24s may contact you to perform portions of a contract in the context of a response to a request for proposals.

**Social Media**

You may be contacted by i24s via social media, such as LinkedIn, if you are connected on the social network with a i24s employee, or if you have indicated through your preference settings that you are open to receiving messages about commercial activities, business opportunities or ventures.

You may also be contacted if you have conspicuously published your electronic address (for e.g., on a social media website), have not indicated that you do not wish to receive CEMs, and the CEM is sent in connection with your business role and function.

**Receiving CEMs from i24s**

You may unsubscribe at any time from receiving CEMs by clicking on the unsubscribe link contained in the footer of the CEM. You may also request to be unsubscribed by notifying the i24s directly and we will remove you from the CEM distribution list(s) within ten business days.

Once unsubscribed, you will no longer receive CEMs from the Group, although you may still receive electronic messages which relate to an ongoing business relationship and/or which are exempt under anti-spam rules.

**Amendments to this Statement**

From time-to-time, the Group will review and update this Statement as required to keep current with rules and regulations, new technologies, standards, business practices and outside parties' concerns. We will post changes to the Statement on our website and if the changes are significant, we will provide a more prominent notice.

## **6 GOVERNANCE**

The governance of this Statement is overseen by the Group's Officer, Angela Kickett. For further information about this Statement and/or other health, safety, environmental or quality management matters, please contact i24s on +61 8 9209 2090 or [admin@i24s.com.au](mailto:admin@i24s.com.au)

*Angela Kickett*

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**Angela Kickett**

**Co-Founder/Executive Director**

