

Purpose

Hellers Limited expects its employees and contractors to meet high standards of performance and behaviour in all their dealings with colleagues, customers, contractors, and visitors to its premises. The Company is committed to not only complying with its legal obligations but also acting ethically and responsibly in relation to all interactions with its customers and the community.

Scope

This Code of Conduct sets out the standard of conduct required to be met by all employees and contractors of the Company. It applies to you whenever you are acting as a representative of the Company. This may include occasions when you are outside your normal workplace or working hours, such as work functions, out of hours work activities, or when you are traveling or elsewhere in the community representing the Company.

This Code of Conduct exists for the benefit of the Company and does not form part of any contract of employment; however, it is a condition of employment that employees comply with it.

The Code of Conduct cannot be drafted to give guidance for all potential situations, and therefore common sense, honesty, integrity, and fairness should be applied in all circumstances.

Conduct requirements

As an employee or contractor of the Company, you are expected to adhere to and uphold the following conduct requirements in the performance of your duties or services:

- Always behave ethically and with integrity
- Be respectful and inclusive in your interactions with others
- Work to the best of your ability, giving proper attention and care to the job
- Comply with all lawful and reasonable directions and instructions from your manager or Director
- Maintain a cooperative and collaborative approach to working relationships which includes sharing relevant information with others and adopting respectful behaviours and language in your interactions with others
- Be reliable and punctual for work
- Follow Company policies and procedures
- Observe safe work practices and report hazards, incidents, injuries, or unsafe work practices
- Report any behaviour considered to be unethical, or inappropriate to your manager or to the General Manager – Operations
- Use materials, equipment, supplies and other resources wisely and prevent their misuse

Conflicts of interest

You are expected to devote your best efforts to the interests of Company in the performance of your duties or services.

You must avoid any actual or perceived conflict between the interests of the Company and your own personal interests. A personal interest may be direct, indirect, financial, or non-financial.

Unless you have the written approval from the Site Manager, employees may not take up employment or any form of paid or unpaid work with a competitor or an organisation doing business or seeking to do business with the Company.

Employees are permitted to engage in outside work activities unless the activity conflicts with Company's interests. Outside work activities may give rise to a conflict of interest if:

- it places you in a position of appearing to represent Company

- it prevents you from fully performing work for which you are employed or engaged to perform at the Company (including reasonable overtime)
- it lessens the productivity or efficiency reasonably expected of you in your job or
- it is for an organisation or individual whose business competes with the Company.

From time to time, employees may be reasonably required to work hours in addition to your ordinary hours of work to successfully perform your role. In cases of conflict with any outside work activity, your obligations to the Company must be given priority.

Disclosure of potential conflict of interests

You must disclose any actual or perceived conflicts so that the Company may assess the situation and implement any measures necessary to manage the actual or perceived conflict. A potential or actual conflict of interest occurs whenever you are in a position to influence a decision or action that may result in a personal gain for yourself, family member, friend or business associate as a result of Company' dealings.

If you have any questions whether an action or proposed course of conduct would create a conflict of interest, you should immediately contact your manager to obtain advice on the issue.

Acceptance of Gifts

Special care must be taken when accepting gifts or benefits as they may create a sense of obligation to the donor. You must declare any gift or benefit to your manager or the line manager so that a decision may be made as to whether to accept or return the gift or benefit or to share it with work colleagues.

Confidentiality

Both employees and contractors will receive or have access to information that is confidential to the Company and its related entities as defined in Australia by the *Corporations Act 2001* (Cth) (**Group**).

Examples of confidential information include:

- any information in respect of a client; specifically, client details including address and contact details, or associated records
- financial or business information related to the Group that is not publicly available or known
- information that is intended for distribution only within the Group and
- any other information that is identified as confidential

Information is not required to be labelled as confidential for it to be Confidential Information. If you are in doubt in relation to whether certain information constitutes Confidential Information you are expected to seek clarification from your manager.

You are not authorised to disclose or discuss Confidential Information outside the Group and should only disclose such Confidential Information to those people within the Company who need to know the information in the course of their work, unless specifically authorised otherwise.

Client information or commercially sensitive documents, records and files are to be stored securely and not left visible or accessible. Computer access passwords, where applicable, should not be shared or revealed to others.

Your obligation to keep Confidential Information confidential continues after your contract and/or employment with the Company ceases.

Use of equipment

The Company provides equipment, materials, and uniforms (if relevant) necessary for employees to perform their role.

You are expected to exercise care in the use of Company equipment and property and use such property only for authorised Company purposes. Loss, damage, or theft of Company property must be reported immediately. Negligence in the care and use of Company property may be considered a breach of this Code of Conduct.

Unauthorised removal of equipment or material from Company premises is prohibited, may be regarded as theft, and may result in disciplinary action up to and including termination of employment.

At the conclusion of your employment or contract, you must return all Company property, uniforms (if relevant), equipment, keys or access passes in your possession or control.

Absenteeism

The Company depends heavily on its employees to ensure business needs are met. It is important that you attend work as scheduled. Dependability, attendance, punctuality, and a commitment to quality care are essential at all times. As such, you are expected at work on all scheduled workdays and during all scheduled work hours and to report to work on time.

If you expect to be late or absent from work, you must notify your manager as far in advance as possible, but not later than one hour before your scheduled starting time, where practicable. This policy applies for each day of your absence.

A record of absenteeism and lateness will be kept by your manager and becomes part of the personnel record. Continued unexplained absenteeism or lateness may result in disciplinary action, up to and including termination of employment.

Dress code

The Company expects you to always maintain a neat and tidy appearance and an appropriate standard of personal hygiene.

Where you are required to wear a uniform, you are expected to always wear and maintain the uniform in a clean and presentable condition.

Examples of inappropriate dress include:

- clothing which is soiled or in a state of disrepair
- slogans or offensive language/motifs/pictures on clothing of a suggestive or political nature
- revealing, tight fitting or see-through attire (including midriff shirts, singlets, short shorts or skirts, and low-cut tops)
- track suits, sportswear or active wear and
- any footwear that would constitute a health or safety risk (e.g. thongs, non-enclosed shoes in areas where machinery is operated)

Please speak with your manager if you have any questions about appropriate dress standards.

Anti-bribery

The Company has zero tolerance towards all forms of bribery. An example of bribery is someone being pressured to make payments or payments in kind to induce others to act in favour of the Company.

The offering, giving, requesting, and accepting of bribes, facilitation payments, secret commissions and payments connected with money-laundering to and from individuals or entities to win business, influence a business decision that affects the Company or for any other reason is prohibited.

Making or requesting such payments could compromise everyone involved, and may expose the Company, you and others to criminal prosecution and serious penalties.

All employees and contractors must immediately report to the Site Manager if they become aware of anything that may contravene/have contravened this section of the Code of Conduct.

Suspected breaches of the Code of Conduct

If you suspect or know that a person has breached the Code of Conduct, you must contact your manager immediately.

If you think you may have breached the Code of Conduct (either knowingly or accidentally) it is in your best interests to speak with your manager immediately.

The Company will take the necessary steps to investigate the alleged breach in accordance with principles of procedural fairness to determine whether there has in fact been a breach of the Code of Conduct. If you, or another individual, is found to have breached this Code of Conduct, the Company may take disciplinary action, which for employees, may include termination of employment.

Review

The Company will review this code annually to ensure that it reflects any relevant legislative changes and remains consistent with Company values. The Company reserves the right to change this policy at any time and without notice.

Approved:



Christine Cash, Chief Executive Officer