

 PO Box 3407 Toowoomba QLD 4350	HR POLICY	Newlands Civil Construction Pty Ltd ABN 41 133 339 778
	CODE OF CONDUCT	Newlands Commercial Construction Pty Ltd ABN 64 166 350 563

Authorised By: B O'Sullivan

HR-POL-001

Version: Dec 2017

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1. Purpose

The purpose of this Policy is to set the standard of conduct and behaviour that is expected by all NCC employees. This Policy is designed to assist staff to understand their responsibilities and obligations and provide guidance on expected behaviour in the workplace.

This Policy is not prescriptive in nature and should be treated as a guide to be applied with common-sense and appropriate judgement.

2. Scope

This Policy applies to all employees of NCC. Any contractors, subcontractors, volunteers and people on work experience are also expected to comply with this Policy as part of their engagement with NCC.

3. Policy

3.1 All employees have an obligation and duty of care to:

- 3.1.1 Comply with prevailing community standards of equity, justice, fairness and compassion and the relevant acts and regulations in dealing with others within and beyond NCC;
- 3.1.2 Perform duties in a responsible manner, with due regard for NCC policies and other legal requirements and obligations;
- 3.1.3 Exert responsible stewardship of NCC resources;
- 3.1.4 Promote and protect NCC's reputation in the wider community;
- 3.1.5 Act appropriately when a conflict arises between our self-interest and our duty to NCC;

3.2 All employees are expected to:

- 3.1. Treat everyone with courtesy, respect, kindness, consideration and sensitivity to their rights;
- 3.2. Refrain from all forms of harassment and discrimination based on gender, race, religious belief, political affiliation, pregnancy, disability, sexual orientation or illness;
- 3.3. Always act honestly, in good faith, and respectful of the trust placed in us;
- 3.4. Respect each individual's rights to privacy and keep personal information in confidence;
- 3.5. Consider the impact of our decisions and behaviour on the well-being of others;
- 3.6. Refrain from acting in any way that would unfairly harm the reputation and career prospects of other employees;
- 3.7. Refrain from allowing personal relationships to affect professional relationships;
- 3.8. Seek advice from an appropriate manager where a colleague's behaviour is perceived to be in breach of the Code and report any suspected corrupt, criminal or unethical conduct to Top Management or the HR Manager;
- 3.9. Behave ethically, honestly and with integrity in their dealings with NCC clients and fellow employees;
- 3.10. Act with due care and diligence, including taking all reasonable steps to ensure that judgements and decisions are based on information that is fair and balanced and is impartial and without self-interest;
- 3.11. Be aware of and report all potential safety hazards to their supervisor as soon as possible, and take due care and responsibility for their own actions and for their work mates who might be affected by their actions;
- 3.12. Ensure that information and advice is provided in a helpful and professional manner;
- 3.13. Ensure the confidentiality and security of all information, especially client data and other sensitive information. All files, papers and electronic data should be used and stored at an appropriate level of security;
- 3.14. Keep all confidential information received or otherwise obtained in your course of employment as confidential;
- 3.15. Not disclose confidential information (including via email), either during the time of employment or after ceasing to be an employee;
- 3.16. Ensure that commitments made to fellow staff and NCC clients are always met within the agreed time frames and where such commitments are unable to be met within the agreed time frame, the staff member or clients should be advised and a new timeframe agreed;
- 3.17. Ensure that professional behaviour, including this Policy, is observed during workplace social functions and other functions that employees may be required to attend;

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- 3.18. Follow the appropriate grievance procedure if they feel they have been harassed or unfairly treated;
- 3.19. Not cause themselves or, due to their actions, NCC, to be in breach of any law;
- 3.20. Comply with any lawful and reasonable steps to avoid, any conflict of interest (real or apparent);
- 3.21. Disclose, and take reasonable steps to avoid, any conflict of interest (real or apparent);
- 3.22. Use NCC resources in proper manner. Such resources may include (but are not limited to): documents and data, cash and credit cards (where provided), goods and services, motor vehicles, personal computers and telecommunications equipment;
- 3.23. Goods or items provided or issued by NCC on a personal basis to assist in the undertaking of the employee's duties remain the property of Newlands and employees are to take due care in the use, custody and control of these items and protect them from unauthorised use;
- 3.24. Not provide false or misleading information;
- 3.25. Not make improper use of inside information if it is not permitted to use the employee's duties, status, power or authority to gain, or seek to gain, a benefit or advantage for the employee or for any other person;
- 3.26. At all times behave in a way that upholds Newlands values and the integrity and good reputation of Newlands;
- 3.27. Dress in a manner that reflects the professionalism of being a Newlands employee;
- 3.28. In no way criticise or demean Newlands, its services of people;
- 3.29. Ensure that all grievances are dealt with in accordance with NCC Grievance Procedure (HR-PR-010);
- 3.30. Ensure that timekeeping requirements are met in terms of starting, finishing and set breaks;
- 3.31. Ensure that all communications to other staff are made in a positive and friendly manner, taking into account the feelings of those staff;
- 3.32. Use NCC technical and physical resources properly, responsibly and for legitimate purposes only;
- 3.33. Seek permission before using NCC property for personal purposes;
- 3.34. Use resources in a manner that cause no harm to the community or environment;
- 3.35. Strive to obtain value for NCC money spent and avoid waste and extravagance in the use of NCC resources;
- 3.36. Secure all NCC property against theft or fraud;

4. Responsibilities

All NCC employees must comply with this Code of Conduct and report any breaches to their direct manager or General Manager as appropriate. Employees can expect that senior management will lead by example in actively promoting and complying with the code.

Employees whose conduct falls below the standard outlined in the Policy will be counselled accordingly/and or disciplined in accordance with our Disciplinary Policy HR-POL-017 and Procedure HR-PR-008.

NCC Top Management assume the ultimate responsibility for Quality, Safety and Environmental requirements and core business practices in the workplace. NCC Senior Management plan, manage, monitor, review, and direct actions and allocate resources to support workers at every level to identify hazards, assess, control and evaluate risk in all areas of NCC operations.



Barry C O'Sullivan
 Director
 Newlands Civil Construction Pty Ltd AND
 Newlands Commercial Construction Pty Ltd

18 December 2017