



Integrated Management System Code of Conduct Policy



Codmah Pty. Ltd.
ABN 19 051 474 983

Codmah Pty Ltd Code of Conduct is a set of principles that provide our workers with a guide on the standards to meet fundamental responsibilities in areas of ethical conduct, human rights, labour, environment and anti-corruption and to identify and resolve issues that may arise in their employment. These principals are based on the Fair Work Act 2009, Commonwealth Sex Discrimination Act 1984, the NSW Anti-Discrimination Act 1977 and The UN Global Compact.

Codmah embrace, support and enact these set of core values which are incorporated into policies and procedures across our organisation within our sphere of influence.

It is essential to the health of our Company that not only the individual, but the collective recognise the rights and responsibilities of other workers, contractors, clients and the community and to treat everyone in an honest and fair manner.

It is a condition of employment that the following be adhered to ensure the highest standards of integrity and sustainability, and comply with applicable legislation.

- PERSONAL AND PROFESSIONAL CONDUCT

- Show consideration to those we interact with, their rights, abilities and values.
- Treat members of the public and other employees with courtesy and behave in a way that takes into account your impact on the company's image in the broader community.
- Behave honestly and with integrity in the course of your employment.
- Recognise your Duty of Care to your work colleagues, clients and the community.
- Take reasonable steps to avoid conflict and act appropriately when conflict arises and comply with Codmah Pty Ltd's Dispute Resolution Procedure where applicable.
- Comply with Freedom of Association and Right of Entry provisions of the Fair Work Act 2009.
- Not make improper use of company equipment, funds, property or resources.
- Comply with Codmah's commitment to environmental management and sustainability.
- Do not solicit gifts or benefits that may compromise or influence your capacity as an employee of Codmah.
- Not to engage in corrupt, fraudulent, extortion, bribery or unlawful practices.
- Not knowingly defame the reputation of others.
- Comply with any relevant legislative, industrial or administrative requirements, and all Codmah work practices, policies and procedures.
- Avoid undertaking activities that could potentially compromise your performance.
- The privacy and confidentiality of personal and health information pertaining to workers or persons associated with Codmah is maintained and managed in accordance with the requirements of NSW privacy legislation.

- CONFIDENTIALITY

"Confidential information" includes all information of a confidential nature regarding the past, current or future business interests, methodology or affairs of any person or entity with which Codmah may deal or be concerned with.

During your employment or engagement any employee or contractor must

- (a) not make any use whatsoever of the confidential information disclosed to them;
- (b) not reveal any confidential information to any person whatsoever except for those officers, employees and professionals who have a need to know the confidential information;
- (c) keep all of the Confidential Information strictly secret and confidential;
- (d) take such steps as are reasonable to preserve the confidentiality and secrecy of the Confidential Information;
- (e) not make copies or duplicates of the Confidential Information except to the extent that it is reasonably necessary to carry out the Employer's/ Contractor's duties.

The obligation to maintain confidentiality and not to use the Confidential Information shall remain in effect for an indefinite period. Notwithstanding the obligation to maintain confidentiality shall cease if the Confidential Information enters into the public domain.

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- WORKPLACE DISCRIMINATION & HARASSMENT

Discrimination occurs when a person or group of people are treated in an unfair or less favourable way because of an attribute such as age, gender, race, religion, sexual orientation, disability, pregnancy, or marital status.

Harassment is any form of behaviour that is unwelcome, unsolicited, unreciprocated and usually (but not always) repeated. It is behaviour that is likely to offend, humiliate or intimidate. It can make it difficult for effective work to be done by the individual or groups targeted or affected by this behaviour.

Codmah is strongly committed to providing a workplace free from all forms of discrimination and harassment. We aim to maintain an awareness of what constitutes unacceptable behaviour and the rights and responsibilities of all employees and contractors relating to workplace discrimination and harassment.

Harassment and discrimination can have devastating effect on the lives of victims causing fear, anxiety and stress which can lead to physical illness, reduction in work performance, increase absenteeism and even resignation. The effect on the workplace is damaging by creating tension and conflict leading to poor morale and reduced productivity.

All employees have a responsibility to monitor their own conduct and to maintain appropriate standards of behaviour. Further, all employees must:

- Act in accordance with Codmah's Values and Code of Conduct;
- Speak out against discrimination and harassment if it is witnessed;
- Be aware of the issue of harassment, of the forms it can take and of the damage it can do to individuals and organisations; and
- Ensure that their conduct does not include behaviour that could possibly constitute harassment.

Managers and supervisors have additional responsibilities, and are expected to:

- Be aware of and familiar with Codmah's Code of Conduct Policy and its application;
- Actively support and promote this Policy;
- Set a good example of professional behaviour and establish high standards of behaviour in the workplace;
- Encourage employees to report instances of workplace harassment;
- Take action to stop discrimination and harassment immediately it is observed or reported; and
- Respond promptly, seriously and with sensitivity to every complaint.

- LABOUR AND EQUAL EMPLOYMENT OPPORTUNITY

All workers are committed to treating each other on the basis of their individual merit and promoting equity in selection, recruitment and succession planning. We are opposed to the unacceptable discrimination in employment on the grounds of sex, race, ethnic origin, age, marital status, sexual preference, political or religious opinion, intellectual or physical impairment, transgender status or carers' responsibilities and the discrimination of a worker because a relative or associate has any of the above characteristics. Under anti-discrimination legislation, unfair treatment based on any of the above is against State and Federal laws.

Codmah recognise employees' right to collective bargaining and do not engage in any form of forced or compulsory labour including child labour.

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- FREEDOM OF ASSOCIATION

To the extent permitted by the Fair Work Act 2009 Codmah Pty Ltd undertakes to guarantee the rights of workers that they are free to choose whether they wish to become, or not to become, a member of an industrial organisations and they are entitled to the benefits membership of an industrial association may provide and are not discriminated against or victimised on the grounds of membership or non-membership of industrial associations.

Subject to the provisions of the Fair Work Act 2009 accredited officials of an Industrial Organisations which have members on a construction site for which Codmah Pty Ltd is responsible, shall have the right to enter the site during working hours in any lunch time or non-working time. Any official of an Industrial Organisation wishing to exercise powers to investigate suspected breaches must comply with the provisions of the Fair Work Act 2009. Officials shall comply with WH&S requirements, the site access and orientation requirements and Site Rules.

- HUMAN RIGHTS

Codmah Pty Ltd affirms its commitment to the principles of the Universal Declaration of Human Rights and the need to conduct our dealings with all people with equality and respect. Codmah support and respect the protection of internationally proclaimed human rights and ensure that we are not complicit in human rights abuses.

- SEXUAL HARASSMENT

Codmah Pty Ltd is committed to ensuring a safe and healthy working environment that is free from sexual harassment as required under the Commonwealth Sex Discrimination Act 1984, the Fair Work Act 2009 and the NSW Anti-Discrimination Act 1977.

Sexual harassment will not be tolerated under any circumstances and action will be taken against any person who breaches this policy.

- DIVERSITY

Codmah promotes and supports a workforce that recognises the skills, knowledge and attributes of individuals from all walks of life. Codmah's culture enhances respect for each other and promotes a motivated and positive workforce.

- ENVIRONMENT

Codmah is committed to managing direct and indirect Environmental aspects across our operations. Codmah undertake initiatives to ensure minimum environmental impacts and explores opportunities for a more responsible and precautionary approach throughout the supply chain, our process and delivery of our services.

It is the responsibility of all workers to promote the principles of the Code, but does not exclude or replace the rights and obligations of workers under common law.

Failure to observe the principles of the Code or any breach under the code or relevant legislation will be dealt with in accordance with Codmah Pty Ltd Employees Collective Agreement and related Policies and Procedures.

John Murtagh
Director

Barbara Atkinson
HR/Systems Manager

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