



## CODE OF CONDUCT POLICY

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### 1. OUR COMMITMENT

Saferoads is committed to ethical conduct and compliance with our legal obligations in everything we do.

### 2. HOW WE WILL MEET OUR COMMITMENT

Our Code of Conduct Policy sets out the standard of behaviour expected of all staff. It is based on the values that guide our decisions, behaviours and actions.

Our values include:

- a) Communicate with Honesty and Respect;
- b) Deliver what you commit; and
- c) Lead by example.

Our decisions, behaviours and actions must reflect these values at all times.

Our objectives are to:

- d) Embed our values in everything we do;
- e) Provide a framework for appropriate behaviour that enables workers to reflect our values in their decisions, behaviours and actions; and
- f) Provide a disciplinary process to be followed if the Code of Conduct Policy is breached.

To this end we have implemented this Code of Conduct Policy and supported by our existing Disciplinary Policy. The Code of Conduct Policy does not encompass all possible scenarios that may arise; instead, it provides a set of values to guide staff on acceptable and unacceptable behaviour. Any breaches of the Code of Conduct Policy will be subject to the disciplinary process set out in the Disciplinary Policy.

### 3. SCOPE

This policy and supporting procedures apply to the decisions, behaviours and actions of all staff both in the workplace and in any work-related context (e.g. work social functions, conferences, business trips).

### 4. RESPONSIBILITIES

Saferoads has identified the following roles within our organisation with obligations under the Code of Conduct, as:

- The employer / person conducting a business or undertaking (PCBU),
- Managers / supervisors, and
- Workers.

A summary of the key responsibilities for each role are listed below.

#### 4.1 Employer / PCBU Responsibilities



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At Saferoads, the CEO is responsible as the Employer.

The Employer / PCBU must:

- a) Ensure all staff are aware of their obligations under the Code of Conduct;
- b) Encourage staff to reflect the values in all decisions, behaviours and actions; and
- c) Review and audit the Code of Conduct on an ongoing basis to ensure it continues to reflect good practice and compliance with the relevant legislation.

### 4.2 Manager / Supervisor Responsibilities

Managers and supervisors are staff who have an area of control within the workplace. In Saferoads this responsibility is accepted by members of the Senior Management Team (SMT) and the Production Supervisor.

Managers and supervisors must:

- a) Ensure all staff in their area of responsibility understand their obligations under the Code of Conduct (i.e. through induction program, position descriptions and ongoing education / training).
- b) Ensure all staff in their area of responsibility reflect the values in all decisions, behaviours and actions.
- c) Document and report any non-conformance with the Code of Conduct in accordance with the Disciplinary Policy.
- d) Resolve or appropriately escalate non-conformance with the Code of Conduct promptly.

### 4.3 Worker Responsibilities

A worker is any person who carries out work for a PCBU, including work as an employee, contractor, subcontractor, self-employed person, outworker, apprentice or trainee, work experience student, employee of a labour hire company placed with a 'host employer' and volunteers.

Workers must:

- a) Reflect the values in all decisions, behaviours and actions;
- b) Take responsibility for their own decisions, behaviours and actions in the workplace;
- c) Comply with all requirements of their relevant position description;
- d) Comply with all supporting workplace policies and procedure;
- e) Discuss with their manager if they have any doubts as to how to apply the Code of Conduct or the appropriate course of action in particular situations;
- f) Report any non-conformance with the Code of Conduct by themselves or others, using the appropriate form (e.g. Incident Report Form, etc.); and
- g) Take part in any disciplinary process as a result of a breach of the Code of Conduct.

## 5. **KEY AREAS OF THE CODE OF CONDUCT**

The following sections summarise the requirements of the key areas of our Code of Conduct. The reference to "staff" in this section applies to all Management and Staff.



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### 5.1 Policies, procedures and legislation

All staff must comply with the policies and procedures of Saferoads and all relevant legislation. (Relevant to their duties).

### 5.2 Attendance and punctuality

All staff are expected to be punctual and attend the workplace during their contracted hours of employment. If a staff member is unable to attend work, they must notify their manager (or other delegate) promptly and provide the reason for the absence and when they are likely to return to work.

### 5.3 Dress, appearance and hygiene

All staff must ensure their appearance is neat, clean and appropriate for their role when they present for work and where a uniform, personal protective equipment (PPE) or High Visibility (Hi-Viz) clothing is required, it must be clean, in good condition and worn correctly. All staff must exercise a high standard of personal hygiene at all times.

### 5.4 Personal behaviour

All staff must perform their role in line with the values and requirements of this Code of Practice at all times.

### 5.5 Use of facilities, equipment, email, phones, internet and social media

All staff must take all reasonable care when using Saferoads facilities and equipment to ensure they are used correctly and are not damaged. If equipment requires a licence, it must only be operated by a staff member with the appropriate licence. During work hours, staff may only use email, phones and internet for work-related purposes. Email and web access logs may be monitored for compliance. Workers are not permitted to use workplace computers to access social media sites during their contracted hours of employment.

### 5.6 Safe and healthy work environment

All staff must follow the requirements of our Quality, Environment and Safety Policy at all times. This policy aims to create a safe and healthy work environment for all workers and other persons at the workplace.

### 5.7 Licences, certifications and other requirements

All staff must possess all relevant licences, certifications and other requirements relevant to their position description at the time of employment, hold them for the duration of their employment and immediately notify their manager if they are withdrawn / lost.

While there is no disciplinary issue if a licence is cancelled or suspended, it should be recognised that staff should never engage in an activity for or on our behalf, without a current valid licence for the activity being undertaken.



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Where a licence is a condition of employment, it remains an ongoing condition of employment. Where a worker does not continue to hold all current valid licences for their role, we may allocate alternative duties, commence disciplinary procedures, or suspend or terminate their employment.

### 5.8 Confidential information, privacy and records management

All staff must ensure that private and confidential information for which they are responsible is secured against loss, misuse or unauthorised access. Staff must not access private or confidential information that they do not have authorisation to access. Staff must use private and confidential information solely for the purposes of performing their duties. All staff must adhere to correct document and record management procedures and must not damage, dispose of or interfere with official documents or files.

### 5.9 Ownership of products and copyright

All products, materials, copyright and intellectual property created, authored, discovered, developed or produced by staff members in the course of their employment will remain the property of Saferoads. Upon termination of employment the staff members will return all documents, data, information, equipment and other property belonging to Saferoads that may be in the worker's possession.

### 5.10 Conflict of interest

All staff must notify their manager of any potential or actual conflict of interest they might have, that could adversely affect the organisation. Failure to disclose or resolve a conflict of interest may result in disciplinary procedures.

### 5.11 Insider trading

Staff with 'inside information' (non-public information) must not trade in shares, influence another person to trade in shares or communicate the 'inside information' to another person who may trade in shares. Refer - Share Trading Policy.

### 5.12 Gifts, commissions, benefits, gratuities

Staff must not accept a gift, commission, benefit or gratuity from a person or organisation if the intent is to influence the staff member's decisions, behaviours or actions.

Small token gifts or benefits (excluding money) may be accepted (less than AUD \$100 value) as long as there is no possibility that the worker's decisions, behaviours or actions may be perceived to be compromised.

If a staff member receives a gift, commission, benefit or gratuity, they must declare it to their manager. If a staff member is unsure of how to respond to a gift, commission, benefit or gratuity, then they should seek advice from their manager.



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### 5.13 Public conduct and media contact

All staff must conduct themselves in accordance with our values and this Code of Conduct when representing the organisation in public. Contact between staff and the media is restricted. Any workers who are authorised to make comments in a public forum on any matter relating to Saferoads must do so in line with our values and this Code of Conduct. Staff must not negatively reference Saferoads in any public forum (including online social media).

### 5.14 Bullying, harassment, discrimination, other unacceptable behaviour

Staff must not engage in any activity or behaviour that may be perceived as bullying, harassment, discrimination or other unacceptable behaviour. Any of these behaviours based on race, gender, age, religious beliefs, disability, sexual orientation or any other factor will not be tolerated and will result in disciplinary procedures.

Staff have an obligation to report any instances of bullying, harassment, discrimination or other unacceptable behaviour to their manager that they observe or are subject to.

### 5.15 Diversity and equal opportunity

All staff will be treated the same regardless of race, gender, age, religious beliefs, disability, sexual orientation or any other factor.

## 6. **SUPPORTING POLICIES AND PROCEDURES**

This policy should be read and followed in conjunction with:

- a) All policies and procedures relevant to a worker's role;
- b) The Disciplinary Policy; and
- c) Specific Saferoads policies as outlined above.

## 7. **IMPLEMENTATION AND EVALUATION**

Saferoads will ensure this Policy is reviewed and evaluated for its effectiveness in delivering policy objectives on an annual basis or earlier in the event of major changes to the legislation or our organisation structure and operations.