

CODE OF CONDUCT

PROCEDURE GC-HRM-PRO-004

Date	Revision Description	Version	Revised by	Document Owner	Document Authoriser
25/11/13	Media contact changed to Chief Executive Officer	1.0	Damien Waller	Damien Waller	25/11/13
09/07/15	Changed from Standard to Procedure, references to other procedures updated to reflect correct references	2.0	Damien Waller	Damien Waller	09/07/15
18/08/15	Updated scope to cover travel in course of employment	3.0	Damien Waller	Damien Waller	18/08/15
07/12/2018	Replacement of STEP values with Georgiou Way, media contact change, gift register amendment	4.0	Damien Waller	Damien Waller	07/12/2018
13/11/2019	Inclusion of Whistleblower procedure in reporting requirements.	4.1	Julia Di Paolo	Damien Waller	13/11/2019

1. PURPOSE & SCOPE

Georgiou promotes a workplace that is friendly, harmonious and safe and recognises the local communities in which we work.

To ensure our success in this endeavour, it is incumbent on the Company and its Managers to set conduct expectations and ensure that persons performing work for or acting on behalf of Georgiou conduct themselves in a professional manner when dealing with clients, colleagues and the wider community.

The Code of Conduct also supports the Company in complying with all applicable state, national and international laws.

The Code of Conduct applies to all employees during normal working hours, when travelling in the course of their employment, when staying in Company provided accommodation and when representing Georgiou out of normal working hours.

This Procedure applies to all Georgiou employees, contractors, subcontractors and consultants. For the purpose of this Procedure they shall be collectively referred to as employees.

2. TERMINOLOGY & DEFINITIONS

Terms and definitions used within this document are further explained in Georgiou's *Terminology & Definitions Guideline*.

3. DESCRIPTION

3.1 Vision and Values

To assist Georgiou in building strong and ethical relationships with its employees, clients and the community, this code of conduct is aligned with Georgiou's vision and values. Georgiou shall incorporate its vision and values into operational activities and business objectives.

Georgiou Vision

To be "the best people to work with"

Georgiou Way Values

The Georgiou Way sets out the company values that define how we do business - both internally and externally - and are vital towards achieving our vision.

They form a large part of our culture and are the foundation on which our business succeeds. To be a great company, we must have a belief and passion about what we stand for in order to create a company we can all be proud of.

SAFETY - Safety is My Way

- We treat our workmates as family
- We take action when we see something unsafe
- We are accountable for our safety behaviour and take ownership of our actions
- We create an environment where people speak up on safety concerns

PROFIT - I value profit and make every dollar count

- We pay on time, every time
- We do not tolerate profit underperformance in ourselves or others
- We ask for help when required and ensure there are no surprises
- We deliver on our financial targets by treating money as our own
- We are accurate, honest and accountable for our profits

RELATIONSHIPS - We build lasting client and subcontractor relationships through trust and performance

- We always complete our projects on time
- We do what we say and never damage the brand
- We safeguard long-term relationships
- We administer the contract at all times

PEOPLE - The best people to work with

- We invest in our people through all aspects of their lives
- I am accountable, consistent and lead by example
- A workplace where people excel
- We encourage strong, capable leaders
- We are autonomous, transparent and trustworthy

INNOVATION - Innovation powers growth

- Our innovative thinking is our competitive advantage
- We are solutions-focused
- Think different - do better!

3.2 Professional conduct

All employees are expected to act consistently with fundamental Georgiou values, ethical behaviour, respect for others and accountability and transparency in business conduct.

Employees are expected to:

- Ensure all business is conducted in accordance with the law and high ethical standards, including equal opportunity and anti-discrimination laws
- Perform their duties in a manner that minimises environmental impacts and maximises workplace safety
- Respect confidentiality and not misuse Georgiou information, assets or facilities
- Ensure their actions do not bring the company into disrepute
- Avoid real or perceived conflicts of interest
- Denounce behaviour that might be perceived as bullying or intimidating
- Exercise fairness, courtesy, respect, consideration and sensitivity in all dealings
- Act with honesty, integrity, decency and responsibility at all times
- Employees should behave and present themselves in a professional and positive manner that supports Georgiou's vision and values at all times when an employee is representing Georgiou

3.3 Business Relations

3.3.1 Confidentiality

All employees are required to protect proprietary, commercial and other information that is confidential to the Company. The obligation of confidentiality shall continue after an individual's employment with Georgiou ends. Information that is not publicly available concerning the activities, results or plans of the Company must only be used for authorised purposes.

Employees shall be required to acknowledge that they have read and understood a confidentiality agreement prior to commencing employment.

3.3.2 Media Contact

Any approach by the media/press for information about or related to Georgiou must be forwarded without delay to the Communications Manager. Employees are not authorised to release information regarding Georgiou to media representatives.

3.3.3 Company Property

Company property, funds, facilities and services must be used only for authorised purposes. Unless governed by law or otherwise agreed in writing, any intellectual property developed by an employee during or as a result of his or her employment by the company is the sole property of the company.

3.3.4 Conflicts of interest

Employees of the Company are expected to act at all times in the Company's best interests and to exercise sound judgment unclouded by personal interests or divided loyalties.

Employees must avoid the appearance of, as well as actual, conflicts of interest in both their performance of duties and in their outside activities.

3.3.5 Gifts & Gratuities

Employees are to exercise care when giving or receiving business related gifts. A gift refers to any item that conveys a feeling of goodwill and, on many occasions at Georgiou, has constituted promotional products, tickets and/or alcohol. In terms of hospitality, employees - in the normal course of their duties - will from time to time receive invitations to attend various functions and business meetings where a meal or refreshments are served. Again these invitations must only be accepted if there is no expectation of favours or repayment. Any gift or hospitality for/from a Federal or State Government representative must be entered into the gift register, regardless of value.

Any gift or hospitality received or given (to other than Federal or State Government representative) of a value of \$250 or greater, must also be entered into the Gift Register.

To access the Gift Register, click [here](#).

3.3.6 Bribes

Employees of Georgiou must not offer or accept cash or any other incentive, inducement or reward in any form. In particular payments to win projects or influence a business decision in the Company's favour. A violation of this is considered serious and will subject an employee to disciplinary action as well as potential criminal prosecution. Employees should take all practical steps to ensure that agents, contractors or business partners do not engage in conduct on Georgiou's behalf that would contravene this Procedure.

3.4 Management Systems

Georgiou has implemented a management system to document the company requirements of operation. All persons are required to comply, so far as the employee is reasonably able, with all policies, standards and procedures. Management system documentation can be accessed through the Company Intranet.

3.4.1 Health, Safety & Environment

Georgiou is committed to providing all employees with a safe and healthy workplace whilst ensuring that no one is subject to unnecessary risk while working for the Company.

Georgiou recognises that effective health, safety and environmental management is an essential component in successful business practices, with Georgiou operating on the premise that legal compliance is the minimum acceptable, with the Company always striving to achieve a higher standard.

As a member of the Georgiou team it is important that employees act and promote these principles in the workplace and raise any concerns in the appropriate forum.

3.4.2 Privacy

In line with the [GC-HRM-POL-043 Privacy Policy](#) Georgiou is committed to complying with government legislation governing privacy of personal information by businesses and protecting the privacy of people who deal with us.

3.5 Compliance

All Georgiou employees are required to comply with the applicable laws, regulations and Georgiou and client requirements in whatever jurisdiction the Company operates and ensure that no breaches occur.

If an employee is in any doubt about the applicable laws, regulations and/or other requirements in the course of their work they should immediately seek advice from their line manager or the Human Resources team.

3.5.1 Whistleblowing

Georgiou's [Whistleblower Procedure](#) outlines the process in which disclosable conduct can be reported. Georgiou is committed to conducting business in a manner that is safe, ethical, professional and complies with the law.

Georgiou encourages the report of information about misconduct, the existence of improper state of affairs or a contravention of legislation.

All reported breaches shall be acted upon and kept confidential and Georgiou's procedures allows persons to make a report without fear of intimidation, retaliation or disadvantage. No employee will be disadvantaged or prejudiced if they report on reasonable grounds a suspected breach of law, regulation or code of conduct.

3.5.2 Disciplinary Action

Breaches of the [Code of Conduct Procedure](#) shall be managed in accordance to Georgiou's [Managing Misconduct Procedure](#).

4. REFERENCES

- [GC-ADM-PRO-009 Terminology and Definitions](#)
- [GC-HRM-POL-043 Privacy Policy](#)
- Whistleblower Procedure
- Managing Misconduct Procedure