

# INTOWORK CODE OF CONDUCT

IntoWork Australia and its Group of businesses (IntoWork) is committed to conducting business in an ethical and professional manner. IntoWork has core values which underpin its operations and its expectations of Staff.

This Code of Conduct aims to establish standards of behavior and conduct expected from Staff, and is reflective of the Values of IntoWork. The purpose of this Code is to describe the standards of behaviour and conduct expected from Staff in their dealings with customers, suppliers, clients, co-workers, management and the general public.

## WHO THIS POLICY COVERS

This Code of Conduct where relevant, operates in conjunction with other codes/policies (including regulatory codes) relating to minimum standards of behaviour and conduct, the Contract of Employment or Contract for Services.

The Code applies to all employees, agents and contractors (including temporary contractors) of the Company, collectively referred to as "Staff".

This Policy does not form part of any employee's contract of employment, however a breach of this Policy may result in disciplinary action up to and including dismissal.

## GENERAL PRINCIPLES

All Staff are expected to observe the highest standards of ethics, integrity and behaviour during the course of their employment with IntoWork. This Code provides an overview of IntoWork's fundamental expectations. It is by no means exhaustive, but summarises some of IntoWork's most important policies, which are based on standards that underlie business ethics and professional integrity standards that apply to all Staff.

All Staff of IntoWork must respect and observe all applicable laws, regulations and policies/procedures/codes of the Company when performing their duties. These include:

1. Staff must act honestly, in good faith and in the best interests of IntoWork at all times.
2. Staff have a duty to use skill, care and diligence in fulfilling the functions of their position and when exercising the powers attached to that position. Staff should not take improper advantage of their position as a Staff member.
3. Staff are expected to start work on time, observe proper times for breaks and to work until the scheduled end of their work day, unless they have negotiated otherwise with their manager. Staff not able to attend work for any reason must make all reasonable efforts to advise their manager in a timely fashion.
4. Staff must carry out instructions given by a person authorised to give such instructions but no staff member shall be required to do anything which might endanger themselves or any other person, is unlawful/illegal, and/or would result in an unlawful or illegal outcome.
5. Information received by Staff while engaged with IntoWork remains the property of IntoWork and may not be used for other purposes or be disclosed to others, unless required to do so by law or approval to do so has been granted by relevant management.
6. Staff must treat everyone with dignity, courtesy and respect. Staff must not swear or talk in such a manner that could be deemed unprofessional.
7. Staff must not act in any way that could be deemed as harassing (sexual or otherwise), discriminatory or bullying.
8. Staff must treat IntoWork's property, whether material or intangible, with respect and care.
9. Staff must not use IntoWork resources (including computers, internet, mobile phones, and vehicles) for any purpose other than work purposes, unless otherwise provided for in an employment agreement.

10. Staff must not make any disparaging or untruthful remarks about IntoWork, other Staff members, customers, competitors, contractors or suppliers. This includes online social networks and related content.
11. Staff must take every precaution to protect IntoWork's information technology systems and assets against unauthorised access, illegal, unethical and inappropriate use, disclosure, unauthorised modification, duplication and/or destruction.
12. Staff must declare any actual, perceived or potential conflicts of interest to their manager, and abide by any directions from IntoWork regarding how the conflict is to be managed.
13. Staff involved in family or personal relationships with other staff members, must not discuss IntoWork confidential matters with each other.
14. Staff must not behave in any way that could risk the health and safety of themselves, other Staff, customers, suppliers, contractors or anyone else that they interact with in their duties.
15. Staff of IntoWork are required to read, understand and agree to comply with this Code at all times by signing the Staff declaration. This acknowledgement will be kept in the Staff members HR file.

## COMPLIANCE WITH THE CODE OF CONDUCT

Staff are encouraged to support each other to maintain the Code of Conduct, and where necessary promptly report any perceived or actual non-compliance, illegal or unethical conduct.

Any potential non-compliance with this Code of Conduct will be promptly, fairly and thoroughly investigated, and if substantiated could result in disciplinary action up to and including termination of employment.

IntoWork reserves the right to vary, replace or terminate this policy from time to time.

## Enforcement

Any user found to have violated this policy (or part thereof) may be subject to disciplinary action based on the IntoWork Performance and Disciplinary Management policy.

## Document Approval

The policy has been approved by the Group CEO and is reviewed annually or sooner should a significant change occur to ensure its continuing suitability, adequacy, and effectiveness. Where possible the review will be conducted in consultation with the senior management of IntoWork Australia businesses.

By approval of this policy, all associated supporting policies automatically obtain management approval for implementation.

A handwritten signature in black ink that reads "Poul Bottern".

Poul Bottern  
Group Chief Executive Officer

13 January 2023

**POLICY VERSION HISTORY**

Rev.	Date	Description of Amendments	Amended By	Approved By
1.0	24/07/2021	Policy created		Group CEO
2.0	13/01/2023	Formatting updates.	P&P	Group CEO