

AHO4002

# Code of Conduct Policy

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**Document Control**

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1.6	EA005 / #146	Kirsty M, Robert S	9-oct-17	Update in section 7 about information disclosure. Change in Scope statement – CommTel Pty Ltd replaced with CommTel group of companies.
1.7	EA081 / #249	Kirsty M	30-oct-19	Clarification around appropriate use of CommTel resources
1.8	EA084 / #265	Kirsty M	25-nov-20	Clarification around incidents or disclosures related to illegal or criminal activities, that the relevant authorities may be notified by the CEO.

**Distribution**

Version	Destination	Upload Date	Location
1.6	Unity	feb-18	Management Systems > Human Resources > Policies
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## 1 Scope

This policy applies to all employees and contractors of the CommTel group of companies (being the Company).

## 2 Introduction

This policy is a framework of guiding principles to ensure employees and contractors comply with all relevant legal and ethical standards in work related matters.

This policy specifies the expected standards of behaviour for employees and contractors in the performance of their duties. Employees and contractors must:

- Act with integrity and professionalism in the performance of their duties and act scrupulously in the proper use of Company information, funds, equipment and facilities;
- Exercise fairness, equity, proper courtesy, consideration and sensitivity in all their dealings in the course of carrying out their duties; and
- Avoid real, apparent or perceived conflicts of interest.

This policy applies in addition to other policies and procedures that may deal with specific issues contained in this policy.

## 3 Corporate Responsibility

CommTel subscribes to the United Nations Global Compact 10 principles and upholds these various principles that relate to labor laws, health and safety, the environment and anti-corruption.

CommTel applies these nominated principles to all workers (including but not limited to permanent employees, contractors, sub-contractors, agents) and the supply chain.

## 4 General Responsibilities

Employees are expected to behave appropriately in the performance of their duties and responsibilities.

Employees must (this is not an exhaustive list):

- Exhibit behaviours consistent with the CommTel Way within their role;
- Perform their duties with skill, honesty, care and diligence;
- Use their authority in a fair and equitable manner;
- Comply with all applicable laws and regulations;
- Maintain a clean workplace, their own workspace and respect for others workspaces;
- Report any breaches or suspected breaches of applicable laws and regulations;
- Abide by policies, procedures, and lawful and reasonable directions that relate to their employment;
- Take reasonable care to ensure their own safety and health while at work and avoid adversely affecting the safety and health of others;
- Comply with all applicable environmental, health and safety requirements established by the Company or prescribed by law;
- Not discriminate on any unlawful grounds when dealing with people in the course of their employment;
- Not harass, bully or intimidate any other person while at work or while otherwise representing the Company;
- Behave in a manner that maintains or enhances the reputation of the Company;
- Ensure dress and appearance are appropriate for the performance of their duties, including wearing a uniform where one is provided or where safety standards require it;
- Report to work on time;
- Provide advance notice of absences or lateness to their manager;
- Be fit for duty;
- Follow directions of their manager;
- Use work time wisely to work productively;
- Continually seek to improve products and services;
- Produce quality work;
- Accept responsibility for assignments and results;
- Use Company resources carefully and efficiently, and only for their intended business purpose (not for personal benefit);
- Treat co-workers and all other persons with whom they deal in a professional capacity with respect, sensitivity and courtesy;
- Respect Company property and the property of others;

- Keep their manager informed of work activities/situations;
- Work in partnership with their manager and other employees and maintain good working relationships;
- Maintain good customer and public relations; and
- Follow location work rules, practices, procedures and directions established from time to time.

## 5 The CommTel Way

CommTel promotes a culture based on customer focus, teamwork, innovation and trust, which are described by the companies guiding principles known as the “CommTel Way”. It is expected that staff exhibit the following behaviours within their roles.

The CommTel Way is described by the following statements:

- We work with customers as if we are part of their company
- We challenge existing thinking
- We deliver our best value when we work as a team
- We support and treat each other positively and with respect
- We take pride in our work
- We have fun

## 6 Conflict of interest

An employee must disclose any personal, financial or other interest which may represent an actual, potential or perceived conflict to their manager or the CEO.

A conflict of interest arises when an employee, contractor or director has a direct or indirect interest in a property, investment or transaction in which they know, believe or ought reasonably to know or believe that the Company has an interest. An indirect interest includes but is not restricted to:

- An interest of a member of the person’s family; or
- An interest of a corporate or other legal entity associated with the person or their family.

A conflict of interest may include any of the following or a combination of them:

- Actual - when the interest exists;
- Potential - when the interest may arise in the future (e.g. because it is under consideration or discussion); and
- Perceived - when the existence of the interest would cause adverse comment if publicised outside the Company, whether or not the conflict is actual or potential.

## 7 Security and use of information

Employees and contractors must cooperate and comply with all approved Security policies, procedures and related documents, including the completion of forms to ensure that security requirements are achieved.

Every employee and contractor must ensure they understand their responsibilities with regards to protecting CommTel’s information and infrastructure, confidentiality, data protection, ethics, information of interested parties, company equipment, facilities and other reputable practices expected by the Company.

Employees and contractors must not disclose to anyone information classified as confidential, restricted or internal by the Company (including strategic, trade, commercial or personal / sensitive information) without the consent of the information owner. This includes but is not limited to customers, competitors, suppliers or other employees or contractors.

The disclosure / inadvertent disclosure of Company related information could cause irreparable harm to the Company. During and after employment with the Company, employees and contractors have a legal obligation not to misuse or disclose any non-public information relating to the Company’s business activities. There may be legal and other consequences if an employee or contractor discloses classified information that affects the Company’s obligations to third parties including clients, at any time during or post-employment at CommTel.

If employees and contractors are unsure whether information is confidential, restricted or internal, they are to obtain confirmation from the information asset owner.

Information held in Company records must not be used to obtain improper financial reward or other benefits, or to take advantage of another person internal or external to the Company.

## **8 Using company property, money, goods or services**

Company property, funds, facilities and services should be used efficiently, economically and for authorized purposes only, and must be approved by the employee or contractors manager.

## **9 Use of official position**

Employees or contractors must not use their position to seek or obtain any improper financial or other advantage for themselves, their family or any other person or organisation.

Employees and contractors must not use their position to harass or disadvantage another person.

## **10 Making statements about official matters**

Employees and contractors must not disclose information about or belonging to the Company which is not public, or make public comment in respect of the Company, directly or indirectly, without the prior approval of the CEO. If making a statement as a private citizen on an official matter relating to the Company, the employee or contractor must declare to the audience that the statement is not made on behalf of the Company.

## **11 Giving and/or accepting gifts, gratuities or other benefits**

Employees and contractors must not give or accept gifts, gratuities, entertainment or other benefits related to the performance of their duties with a value in excess of AUD\$100 without the approval of the COO. When working with companies or individuals outside Australia where the allowable gift value is lower than \$100 and/or conditions are more stringent, then those lower values and more stringent conditions apply.

## **12 Working for other organisations or conducting other Business**

Working for another organisation or conducting a business outside the Company is not permitted without the prior written permission of the relevant manager or the CEO. Permission will be granted where the manager or the CEO is satisfied that the outside work is not likely to lead directly or indirectly to a conflict of interest or to unsatisfactory performance. The Company will not unreasonably withhold approval for an employee to undertake external paid work.

An employee or contractor must not canvass or conduct non-Company business during working hours, while working for the Company, without the prior written permission of their manager or the CEO.

## **13 Equal opportunity and harassment**

All employees and contractors must be aware of, and comply with, the Company's Equal Employment Opportunity Policy and the requirements to respect the rights of others. Employees or contractors must not discriminate against, bully or harass any person in the course of their work for the Company as detailed in the Equal Employment Opportunity Policy.

## **14 Safety and environment**

Employees and contractors must cooperate and comply with the Health & Safety Policy, procedures and completion of required forms to ensure that the health and safety of themselves and others is not endangered.

Employees and contractors must undertake safety training where required, avoid and prevent the misuse of safety and first aid equipment, wear personnel protective equipment (PPE) where provided (unless there is a reason why they cannot wear the PPE), and report potential or actual risks, hazards, accidents, injuries and unsafe practices.

Employees and contractors must not come to work if they are under the influence of drugs or alcohol. In particular, employees must not operate machinery or vehicles. The consumption of alcohol is not permitted on Company premises or property without the permission of the relevant member of the executive team in

accordance with the Fitness for Work Policy. No drugs of any kind, other than those required for medical reasons, may be brought into or consumed at the workplace.

Employees and contractors are expected to declare to their supervisor any use of medication including prescribed medication that could pose a threat to other people or property.

Good environmental management is the hallmark of modern business. Employees and contractors must comply with the relevant environmental workplace practices.

## 15 Travel and entertainment

Travel and entertainment should be consistent with the needs of the business. The Company intends that employees neither lose nor gain financially as a result of business travel and entertainment. Employees who receive approval from their manager to incur travel and entertainment expenses are responsible for the propriety and reasonableness of the expenses, ensuring that Expense Claim Forms are submitted promptly and that receipts and explanations properly support reported expenses.

Refer to the Travel Policy.

## 16 Employment after leaving the company

An employee who is about to leave, or does leave, the Company for other employment or to conduct their own business must not use the Company's confidential information to the benefit of their future employer or business, nor to disadvantage the Company in commercial or other relationships. If unsure, employees must discuss the matter with their manager or the CEO.

## 17 Computer and Internet use

Use or duplication of proprietary software, except as described in the software licence agreement or conditions applying to its use, is an infringement of copyright law and is strictly prohibited. This applies to both personal and Company software.

The security of the Company's computer system and data is paramount. Deliberate or reckless security violations of applications or the data network will constitute misconduct.

Accessing, storing, distributing or downloading pornographic or other offensive material is a serious breach of this policy.

Employees and contractors are required to comply with the Computer and Internet Usage Policy as amended from time to time.

## 18 Examples of serious misconduct

The following list provides examples of conduct that may result in dismissal, including summary dismissal (without notice and with no prior warning):

- Disregarding personal safety or the safety of others in a manner that causes or has the potential to cause serious harm;
- Refusing to carry out reasonable work-related instructions;
- Deliberate destruction, damage, waste or misuse of property, data or equipment belonging to the Company, other employees or customers in any manner at any time, or the commission of acts likely to cause destruction, damage, waste or misuse of such items;
- Illegal sale, distribution or manufacture of alcohol or drugs;
- Use, sale or personal possession (e.g. on the employee's person, in a toolbox or locker) of illegal drugs during work time, including rest or meal periods, or on Company property at any time;
- Personal possession (e.g. on the employee's person, in a toolbox or locker) of firearms, weapons, or explosives during work time, including rest or meal periods, or on Company property at any time unless specifically authorised;
- Unauthorised removal or redirecting of property, data, documents or funds belonging to the Company or others, to a non-approved location;
- Conviction for an indictable offence;
- Providing false and/or intentionally misleading information to the Company, either orally or in writing, including on applications for employment, time sheets, pay records, legally required records, production reports, quality records, expense records, tests, medical records/claims, or other data requested by or submitted to the Company as well as information or claims requested by or submitted to Company insurance providers;
- Threatening, intimidating, or coercing another employee or customer, at any time for any reason;

- Fighting with or deliberately striking or threatening another employee, customer or other person during work hours, including rest or meal periods, or on Company property except in reasonable self-defence;
- Knowingly concealing or failing to disclose defective work;
- Conducting or participating in organised gambling (e.g. organised bookmaking) on Company property at any time;
- Unauthorised and/or wilful accessing, compromising, disclosing, or use of confidential information or data; and
- Verbal or non-verbal harassment (e.g. demanding favours as a condition of employment, failing to stop harassment once warned, or serious harassment) directed towards any person.

## 19 Breaches of this policy

All employees and contractors are expected to abide by this policy and associated policies and procedures. When in doubt, or if an employee or contractor has any questions about their responsibilities, that person must seek clarification from their manager, or the CEO.

Responsibility for the administration of this policy lies with managers. Except for issues covered by whistleblower protection (see below), a copy of each complaint or disclosure made under this policy must be forwarded to the CEO. For complaints or disclosures relating to serious misconduct involving illegal or criminal activities, the CEO may initiate contact with the relevant external authorities on behalf of the company.

If an employee or contractor breaches this policy they may be subject to serious disciplinary action, up to and including the termination of their employment or engagement.

Employees may, at any time, discuss a matter or seek advice on how to proceed with a matter arising under this policy with their Manager, or the CEO.

## 20 Whistleblower Protection

All employees and contractors are encouraged to report any misconduct or breaches of the Corporations Act or the ASIC Act ("Whistleblower Complaints").

All Whistleblower Complaints should be made to the CEO or executive management team in the first instance. In the event that the CEO or executive management team is not available or if the complainant does not consider it appropriate then the Whistleblower Complaint should be made to their Manager. In the event that neither is available or appropriate then the complaint should be made to the Company's auditor or to ASIC.

An employee or contractor who discloses such a breach will be protected as a whistleblower and will not suffer any retaliation, disadvantage or prejudice for making such disclosure if they:

- Report the matter to ASIC, the Company's auditor, their line manager, the CEO;
- Give their name (anonymous reports are not protected by whistleblower legislation);
- Have reasonable grounds to suspect the breach; and
- Act in good faith.

If a matter is reported to any of the people above then they will:

- Not disclose the identity of the claimant (or information that would lead to identification) to any other person, including the CEO or directors of the Company, without the consent of the complainant;
- Not pass on the information in relation to the complaint under any circumstances, even if this is required to investigate the matter, without the consent of the complainant; and
- Investigate the matter in accordance with the above and, if they consider it appropriate, take action to address the matter. If unable to rectify the matter then, if that person considers it appropriate, they can:
  - Seek the consent of the complainant to escalate the matter to the CEO or the Chairman of the Board; or
  - Report the matter to ASIC, APRA or the Australian Federal Police (with or without the consent of the complainant).

Whistleblower protection does not apply to the reporting of misconduct in which the person reporting the misconduct has participated, and that person will not receive immunity from liability for that misconduct.

## 21 Status of this Policy

This policy is not a contract and does not give employees enforceable rights. The Company may amend or remove this policy at any time.

## 22 Relevant Policies

Other policies and guidelines that may be relevant include the following:

- AHO4004 Equal Employment Opportunity Policy
- AHO4006 Fitness for Work Policy
- Health and Safety Policies
- AHO4018 Travel Policy
- AHO4003 Computer and Internet Usage Policy

## 23 Further Information

If you have any questions about any matter in this policy, please contact the HR Consultant.



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**Robert Green**  
Chief Executive Officer



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