

1. Objective

This policy aims to provide a consistent guideline to expected behaviour in the workplace for all Wilson employees. Additional advice and guidance on the application of this policy is available from Human Resources staff.

2. Policy

The Code of Conduct outlines the requirements expected from every employee in observing certain principles in their interactions with other employees and in relation to the Company as an employer. In addition, the Code of Conduct demonstrates the Company's commitment to all employees.

The best workplaces are positive, safe and conducted with the principles of quality customer service in mind. Employees shall extend that ethos in their interactions between Employees themselves and external customers and between internal customers (employee to employee) across our network.

All employees are expected to conduct themselves in a manner which reflects a positive image of the Company, the safety of its workplaces and its business practices, and shall undertake any activity in the name of the Company to uphold the procedures, standards, reputation and values of the Company.

Any employee who conducts themselves in a manner which does not meet these expectations will be subject to disciplinary process.

3. Employee's Commitment to the Company

To demonstrate an employee's commitment to the Company it is expected that the employee will:

- Ensure that their actions do not bring the Company into disrepute;
- Disclose and resolve any conflicts of interest;
- Refrain from canvassing for private business during work hours;
- Not disclose confidential Company information, or use such information for their own gain or to disadvantage another;
- Decline gifts and benefits from customers or suppliers;
- Only transact and approve expenditure for which they are authorised;
and
- Not abuse, deface or wilfully damage Company or Client property and equipment.

4. External Employment or Interests

It is the Policy of the Company that employees may pursue other opportunities outside their employment with Wilson provided that the employee meets, and continues to meet all of their commitments to Wilson in accordance with their position description, key performance indicators and relevant policies, procedures and work instructions.

Where an employee has been engaged on a full time basis with the Company, it is the Policy of the Company that any secondary employment or enterprise must take second priority to all job requirements contracted with Wilson.

Procedure for External Employment

- Employees are not permitted to be engaged in any activity that relates to their other job/outside activity during their work time at Wilson or be found using Company resources and/or assets for such activities.
- If, at any time, involvement in another Company is seen as interfering, conflicting or competing in any way with the interests of the Company, the employee may be asked to terminate such relations/activities.
- There will be no discrimination either for or against employees pursuing outside interests, subject to assurance by the Company that this interest does not pose a conflict to the best interests of the Company.
- It is expected that in circumstances where an employee has other employment at the commencement of their employment with Wilson that they shall inform a Senior Manager of the Company of the other obligation without delay. This notification shall be given in writing to specify the nature of the other employment, the duties undertaken and the number of hours worked per week. Once considered by the Senior Manager, and if deemed acceptable, a letter of acknowledgement (using the Company template as a guide) shall be issued to the employee and a copy of the Company's letter shall be placed on their personal file.
- In the case that an existing employee considers engaging in additional employment, it is the expectation of the Company that they shall seek formal approval from the Company prior to commencing work in the alternate role. The process shall take the same format as detailed for a new employee.
- The criteria that the Senior Manager shall consider the other employment in light of shall include (but is not limited to) the potential for a conflict of interest in terms of the business undertaken by the other employer and the potential risk from an OHS perspective of the quantum of hours to be worked. If the Senior Manager is satisfied that the alternate employment poses no concern to Wilson, he / she shall review the matter with the Chief Executive Officer responsible for the Division and confirm the outcome to the employee in writing as detailed above.

5. Employee's Commitment to Respect for Others

In dealing with customers, suppliers, and other employees, the Company expects that all employees will:

- Not use language or behaviour that offends, harasses, or unfairly or unlawfully discriminates against any person;
- Observe the instruction and intent of the Company's policies and procedures and applicable Legislation;
- Not work when affected by alcohol, recreational or prescription drugs which have side effects which may inhibit work performance or put the employee and others at risk; and
- Abide by all safety rules and procedures operating within the Company and also comply with all relevant Legislation regarding health and safety in employment in order to provide a safe and healthy workplace for everyone, including customers and suppliers of the Company.

6. Employee's Commitment to Customer Service

When dealing with internal and external customers the Company expects that an employee will:

- Be honest, courteous and helpful;
- Be actively consultative and listen to customers;
- Provide prompt attention, accurate information and meet commitments;
- Ensure that their appearance is neat, clean, and appropriate to the job, wearing a uniform where required;
- Provide accurate, timely and proactive advice; and
- Strictly adhere to Company policies and procedures with respect to disclosure of confidential information.

7. Employee's Commitment to Teamwork

To help the Company and its employees work together toward achieving the goals of the Company it is expected that all employees will:

- Be punctual, and only leave the workplace early after gaining prior approval from their most immediate Manager;
- Report and account for any absences; Follow lawful and reasonable instructions;
- Provide guidance and feedback to others in a constructive manner; Actively learn from others, seeking assistance when required; Share relevant information; and
- Observe safe work practices and report hazards, accidents, injuries, and unsafe practices.

8. Breach

To provide guidance in applying the Code of Conduct, the following matters are listed as examples which would constitute a breach of the Code of Conduct:

- Removing, copying or misplacing Company property or equipment, client records or Company documentation without prior approval.
- Any violation of any Company policy or procedure as outlined in this manual, including any violation of the Company's Workplace Diversity policy.
- Falsification or misrepresentation of qualifications or experience while applying for employment with Wilson.
- Destruction, misappropriation, misuse or damage to any Company, supplier customer or Client property.
- Failure to follow reasonable instructions provided by an authorised management representative or immediate Supervisors.
- Consumption of alcohol or any controlled substances during work hours.
- Sale or provision to others (whether at a cost or not) of alcohol or any controlled substances to employees, customers, suppliers or contractors at any time while in the Company's employment. Attendance at work (whether for a rostered period of work or not) under the influence of any controlled substances including alcohol.
- Misrepresentation of the Company, its Directors, Management or Employees and their intentions.
- Consistent absence from work without proper cause and documentation.
- Consistent lateness without proper cause or documentation.
- Abuse of persons, whether customers, colleagues, contractors or any other person (verbal, physical actual or implied).
- Submission or completion of inaccurate or false claims for payment, reimbursement, or time and attendance records.
- Misappropriation of Company, customer, supplier or contractor property.
- Acceptance of monies, benefits, goods, favours, tips, discounts, complimentary stock.
- Conduct which would constitute a breach of Equal Opportunity, Human Rights or any other Legislation.
- Conduct which would constitute criminal or unlawful activity while in the employment of the Company.
- A failure to disclose involvement in any of the above to a Senior Company representative.

9. Forms

External Employment – Acknowledgement Letter

10. Related Policies

Customer Service

Disciplinary Action

Managing Diversity

11. Policy Owner(s):

Any action relating to review of this policy is the responsibility of Human Resources staff, in conjunction with the Executive.

Please contact humanresources@wilsongroupau.com with any feedback