

# Code of Conduct

Version 5  
Released 15/07/2022

**Overview:** The purpose of this Code of Conduct ("The Code") is to provide employees with guidance on the standards of behaviour expected of them in performing their duties of employment and in their dealings with fellow employees, contractors, visitors and members of the community.

The Code provides a general framework of principles to be adopted by employees with respect to their conduct while employed by Australian Sustainable Hardwoods Pty Ltd (ASH).

The standards of conduct required to be met under the Code exist alongside the standards of behaviour and performance required of employees under their contract of employment, ASH policies and procedures, industrial agreements and any other ethical or professional code of conduct that may bind an employee of ASH.

Compliance of the Code ensures that ASH sites are safe, harmonious, positive and proficient workplaces.

**Application:** All ASH employees

**Legislation:** Occupational Health & Safety Act 2011  
Occupational Health & Safety Regulations 2017 (Victoria)  
Fair Work Act 2009  
Equal Opportunity Act 2010

**Reference:** Health, Safety and Wellness (Wellbeing) Policy  
Alcohol & Other Drugs (Fitness for Duty) Policy  
Workplace Equal Opportunity Policy  
Anti-Discrimination & Bullying Policy  
Environmental Policy  
People and Workplace Wellness Policy  
Purpose and Values Policy  
Employee Inductions

**Key Principles:** **Compliance with legislation**  
All employees will respect and observe all applicable acts, regulations and ASH policies and follow all lawful directions. Where concerns arise; report these to your manager before any action or decision is taken.



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### Respect for ASH values

All employees will uphold the following ASH corporate values and use them as guiding principles in the conduct of their work and working relationships. The values are:

- We are committed to the wellbeing of people and the environment.
- We encourage each other to do things better every day.
- We all take pride in our roles demonstrated by our attitude, effort, commitment and care.
- We involve and listen to each other to get the best outcome.

### Occupational health and safety

ASH is committed to health, safety and wellbeing of its employees, contractors and the general public and believes that every employee, and contractor working with ASH has the right to return home from work free from injury and harm. All employees will comply with all health and safety legislation and regulations as a minimum and adhere to ASH's health and safety and wellbeing policies and procedures.

### Protection of ASH's interests

All employees will conduct themselves with honesty and integrity, respect each other, adhere to and comply with ethical obligations and avoid taking any actions that compromise ASH's name, legitimate interests and business objectives.

### Professional behaviour

All employees will maintain the highest levels of professional conduct in our interactions with each other and in representing the company with our customers, other stakeholders and the wider community. Business relationships will be maintained in a manner consistent with the principles of:

- Courtesy and respect for others
- Integrity and fairness
- Taking responsibility for one's actions and being accountable for the consequences
- Having regard for interests, rights, safety and welfare of others
- Acting honestly, cooperatively and being trustworthy
- Being fair and unbiased in all our dealings
- Merit, equity and probity
- Promoting a positive image of ASH

### Workplace behaviour

All staff are encouraged to treat each other with tolerance, dignity and respect and encourage the maintenance of a safe and positive work environment. Under the Equal Opportunity Act and this Policy, the following types of conduct are unlawful and strictly prohibited:

- Discrimination



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- Vilification
- Sexual Harassment
- Bullying
- Victimisation

**Standards to be observed in performing duties**

In performing their duties of employment employees are expected to observe the following obligations:

- Be familiar with and observe all ASH’s rules, policies and procedures;
- Observe and comply with all relevant legislation and regulations;
- Maintain and observe all safety and health procedures in the workplace. Employees must not do any act or omission which may cause injury or harm to any other person;
- Avoid behaviour that could reasonably be perceived as harassment, sexual harassment intimidation, discrimination on any basis, bullying or threatening in any other way;
- Avoid conflict of interest situations. Without limiting the types of situations, where conflict arises, employees should:
  - Avoid personal relationships with other employees which may give rise to a conflict of interest. For example, when an employee is required to supervise another employee with whom they have a personal relationship (relative/ partner/ friend);
  - Disclose any conflicts of interest.
- Use ASH facilities, resources and information in a proper manner;
- Not use, distribute, sell, possess, or be impaired by the use of drugs and alcohol in the workplace.
- Not attend work fatigued or sleep on the job

**Dress standards**

Dress standards are to be appropriate to the workplace and the tasks being undertaken on any particular day. Regardless of whether employees are working from a corporate or operational location, employees will wear and maintain their uniform/ dress in a way that is consistent with and projects ASH’s values.

Safety requirements mandate that approved personal protective clothing and footwear shall be worn at all times by employees in operational areas. Employees in non-operational areas should wear footwear that is appropriate, having regard to their role, working environment and workplace hazards. Employees visiting operational areas should ensure that they check operational requirements prior to visiting the area and comply at all times.

If you have any queries or doubts regarding dress standards, please check with your Supervisor.

**Action within delegated authority and company policy**

All employees will act within the limits of our authority and company policy. Managers will be responsible to inform all employees of the limits



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of their delegated authority. Employees who are uncertain of their authority should seek clarification from their Manager.

### **Conflicts of interest**

All employees owe their first business loyalty to ASH and will not allow any actual or perceived conflict of interest to affect ASH operations.

ASH employees (including embedded contractors) to:

- Be aware of what a conflict of interest is and how one can arise
- Disclose any identified conflict of interest that arises in any matter in which they are, or are expected to be, involved as part of their employment.
- In consultation with their department Manager, agree on and implement an appropriate strategy for effectively managing a conflict of interest.

Employees must disclose a conflict of interest to their Manager.

### **Gifts and entertainment**

All employees will not seek, offer or accept any payments, gifts, benefits, favours or entertainment beyond that which is considered normal, and legitimate business practice, or which could be or could be seen to be, inducement, incentive or reward for preferential treatment. Also, any gain or benefit, either sought, or accepted, should not be related to any personal associate, relative or friend, unless approved by the Managing Director

If a gift is offered that could be considered by others as improper, the offer of the gift must be declined and the employee should report the fact to their Manager.

As a guide, in circumstances where it is reasonable for an employee to accept a gift or hospitality, employees may accept standard items or entertainment comparable to that which ASH provides to its own business customers and clients e.g. luncheon or sporting hospitality. Employees should not accept a gift valued in excess of \$A200 without approval from the relevant Manager (as above). If approval is given, any gift accepted will be the property of the Organisation unless the relevant approving officer otherwise agrees. Acceptance of hospitality valued at greater than \$A200 should also be approved by the relevant Manager.

Membership of company loyalty programs including airline frequent flyer programs is a private matter for the employee. Frequent flyer points earned by employees in connection with business related travel will accrue to the employee as a private entitlement.

### **Use of company assets**

All employees will use ASH assets, including funds and equipment, in an authorised, efficient and appropriate way. This includes:

- Preventing misuse of assets
- Controlling and securing assets



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- Avoiding extravagance
- Offering proper commercial principles to the purchase and disposal of assets.

### **Use of company computers, telecommunications and other resources**

All employees will use company computers, telecommunications and other resources appropriately. All personnel are required to maintain confidentiality of private passwords to computer files and not manipulate, interfere with or access unauthorized computer systems.

### **Use of personal Mobile Phones**

The use of mobile phones in the workplace and in vehicles can create unsafe situations. It is very clear, and the evidence is compelling that multitasking whilst using a mobile device results in accidents as you are distracted by the call or the text message. For this reason, the use of all mobile phones is to be strictly controlled on ASH sites.

The following rules apply to Personal phones brought onto the work site and not reimbursed by the company.

Personal mobile phones are not to be used at work, accept in an emergency defined below or in the employee's meal and tea breaks.

If you have agreed to take work calls on your personal phone, then it can be used outside the restrictions for taking the work calls but the behaviours around the phones use still applies.

#### *Vehicles*

Handheld mobile phone use whilst driving motor vehicles including: company cars, forklifts, trucks, loaders and any other machinery is illegal and should not be considered under any circumstances. This includes texting or reading texts or caller ID.

- Allow calls to go message bank and only answer calls after the vehicle is pulled over/stopped.

#### *Emergency*

Definition – "An **emergency** is a situation that poses an immediate risk to health, life, property, environment or a critical event (e.g. your partner due to give birth)". It is a typically infrequent event.

- You may carry your mobile for emergency calls. If you are aware of a situation that means you may need to take an emergency call, then you need to inform your supervisor.
- The company has the right to check that the call you received or made was a genuine emergency.

#### *General guidelines for mobile phones on ASH sites:*

- The mobile phone is:
  - Not to be used when you are operating mobile plant unless the vehicle is parked in an appropriate location – not blocking access ways.



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- Not to be used for reading the latest updates of news, social media, texting, emails, messaging, games etc except during meal and tea breaks.
- Not to be used in any of the control rooms when controlling machinery
- If operating equipment, then you must let the call go through to message bank arrange relief operator with your supervisor and once your relief has arrived take the emergency call.
- If your mobile device is damaged or lost it is your issue. The Company will not reimburse you for any costs.
- Workplace behaviours apply in the use of all phones.
- Do not walk and use your phone, ensure you are in a safe area (e.g. designated walkway, safe zone) and remain stationary.
- If the plant has broken down this is not an opportunity to check your phone for emails/texts/Social media updates etc. There are always constructive activities to be undertaken.
- During work time, personal phones should be on silent.

#### Consequences

- It is an offence to use mobile phones whilst operating a motor vehicle, operating plant or any other equipment and any consequences for doing so may result in disciplinary action. Any vehicle damage incurred as a result of this practice, which is not recoverable through insurance, may be recovered from employees.
- The success of this part of the policy relies on the maturity of the employees bringing their mobile phones to work. Inappropriate use will result in performance management and curtailment of your use of your personal phone whilst at work.
- Use of a company supplied or reimbursed phone is covered under the “mobile phone – company supplied or reimbursed” policy.

#### **Stealing, misappropriation and illegal practices**

All employees will not misuse ASH funds or property, nor assist others to do so, and will disclose illegal practices and unlawful behaviour such as theft, fraud, corruption, conspiracy and maladministration that comes to your attention to your Manager.

ASH will seek to prevent and detect fraud and corruption through the use of appropriate internal controls which are subject to regular internal and external compliance audits and reviews.

#### **Management of diversity**

All employees recognize and value the diversity among our people and members of the public. All forms of bullying, discrimination, harassment



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and victimisation are prohibited. We will not unlawfully discriminate on the following grounds or characteristics:

- age
- carer and parental status
- disability (including physical, sensory and intellectual disability, work related injury, medical conditions, and mental, psychological and learning disabilities)
- employment activity
- gender identity, lawful sexual activity and sexual orientation
- industrial activity
- marital status
- physical features
- political belief or activity
- pregnancy and breastfeeding
- race (including colour, nationality, ethnicity and ethnic origin)
- religious belief or activity
- sex/sexual identification
- expunged homosexual conviction
- personal association with someone who has, or is assumed to have, one of these personal characteristics.

ASH's objective is that its employees and associates/prospective employees can make their best contribution to the company.

We will apply these principles in all our dealings with work colleagues and all persons having contact with ASH.

**Responsibility for the environment**

ASH is deeply committed to environmental sustainability and achieving sustainable forest management and timber processing through social, economic, safety, and environmental accountability.

All employees will comply with environmental legislation and make full and proper use of materials, recycle and avoid waste; manage noise levels and the containment of spills.

**Information, reports and record keeping**

The accuracy, use and handling of information are critical to ASH's integrity and reputation. This includes:

- Recording of actions and decisions to ensure transparency.
- Not making any false or misleading entries.
- Respecting the confidentiality, and observing the privacy, of information about the Company, its customers and fellow employees.
- Disclosing all relevant information whilst maintaining appropriate confidentiality and following relevant legislative requirements.
- Ensuring that only those authorised to use the information concerned are given access to such information.
- Using information available to us solely for the purposes required as part of our designated ASH duties.
- Not using confidential information that is not publicly available, for your own private gain or advantage of others.



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- Ensuring that sensitive or confidential information is securely stored.
- Maintaining appropriate confidentiality after ceasing to have a relationship, working or otherwise, with ASH.

“*Insider information*” must not be used by any employee for their own gain, or the gain of any other person.

### **Decision-making**

ASH is committed to making decisions in a fair, impartial and prompt manner giving consideration to all available information, legislation and its own policies and procedures.

### **Breaches of the Code of Conduct**

It is every person’s responsibility to report any breach of this Code of Conduct, or any matter of serious concern to their Manager. The full protection of the Board of ASH will be granted to anyone who reports misconduct.

It is mandatory that any breach involving collusion, fraud, corruption, dishonesty or misuse of ASH’s funds, assets or information (including the suppression of information) be reported immediately to the person’s Manager, who must then inform the Operations Manager. If an employee feels unable to discuss a breach with their Manager, or is unhappy with the Manager’s response, then it can be raised solely with the Operations Manager. Any employee reporting a breach will be advised of the outcome of the matter.

All other matters or inquiries relating to the Code of Conduct, its meaning and interpretation should be directed to your department Manager.

### **Observance of the Code of Conduct**

ASH undertakes to make the Code of Conduct known and accessible to all directors, employees, contractors, consultants and the general public.

Should an employee have any uncertainty about any aspect of the application of the Code of Conduct, they should seek immediate clarification from either their department Manager.

Management will strive to ensure the Code of Conduct is observed in word and in spirit, by all who represent ASH. This will include reporting unlawful behavior to the appropriate enforcement authority.

### **The role of directors**

In addition to the specific statutory powers conferred and obligations imposed by legislation, directors will observe the following standards of conduct:

- Act in the best interests of ASH as a whole
- Be independent in judgment and in actions
- Take all reasonable steps to be satisfied as to the soundness of all decisions made by the Board, recognise the Board primary



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responsibility is to ASH's owner/shareholder, but will, where appropriate, have regard for the interests of all stakeholders.

**Contact:** Operations Manager

THIS POLICY IS NOT TO BE CONSIDERED IN ISOLATION; IT IS TO BE READ IN CONJUNCTION WITH ALL RELATED POLICIES AND OTHER DOCUMENTS, INCLUDING, BUT NOT LIMITED TO, THOSE SPECIFICALLY LISTED IN THE BODY OF THE POLICY DOCUMENT.

**Authorisation:**   
**Signature:**  
**Vince Hurley**  
**Managing Director**

**Version:**

Version	Released	Description
1	23/07/2013	
1	26/06/2015	Reviewed
2	22/04/2016	Annual review and update
3	07/04/2017	Annual review and update
4	18/07/2021	Updated to align with current practises
5	15/07/2022	Addition of ASH Values and Workplace Behaviours



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