



CODE OF CONDUCT POLICY

This policy encompasses all MCS Civil NSW projects. This policy also applies to projects involving MCS Civil which are being carried-out under a joint venture arrangement, where no other policy of this type exists. This code of conduct applies to all employees and directors

Objectives

The object of the code is to provide a framework of principles for conducting business and dealing with shareholders, customers, colleagues, suppliers, creditors and other stakeholders which are:

- to act with the utmost integrity and professionalism and be scrupulous in the proper use of company information, funds, equipment and facilities;
- to exercise objectivity, fairness, equality, proper courtesy, consideration and sensitivity in dealing with customers, Employees and other stakeholders;
- to avoid conflicts of interest; and
- to comply with the letter and the spirit of the law.

Employee Responsibilities

MCS Civil Employees are required to:

- promote the interests of MCS Civil;
- respect their co-workers, customers, suppliers and other service providers;
- comply with laws regarding equal opportunity;
- perform their duties with skill, honesty, care and diligence, using authority in a fair and equitable manner;
- abide by policies and procedures, instructions and lawful directions that relate to their employment and duties;
- comply with the spirit as well as the letter of the codes of conduct applying to the professions of individual Employees; and
- act within the law.

Conflicts of Interest

- Employees must avoid any personal, financial or other interest which may be in conflict with their duties and responsibilities at MCS Civil.
- Any interest which may constitute a conflict of interest must be promptly disclosed to management.
- Accepting any external appointment, such as a board appointment, working for another organisation, or conducting a business that detracts from an Employee's ability to fulfil their specified role for MCS Civil is not permitted without the permission of the Managing Director.

Company Property

- MCS Civil 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 their employment by MCS Civil is the sole property of MCS Civil.

Safety

- Employees must observe and comply with all safety practices and procedures introduced by the Company to maintain a safe workplace.



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- Unsafe work practices must be reported to the immediate manager.
- MCS Civil equipment is to be maintained in a safe operating condition.
- Protective equipment supplied by MCS Civil must be correctly used at all times by Employees

Environment

- Employees must comply with relevant legislation and promote environmental awareness, to raise standards.
- Employees must comply with the environmental policies of clients.
- Employees are to use energy and other resources efficiently.
- Employees are encouraged to support community activities in the areas in which they work

Gifts and Entertainment

- Employees, from time to time, entertain or are entertained, and give or receive gifts in the course of their duties.
- Gifts should never be offered or accepted in circumstances where the outcome of a transaction may be influenced by the gift, or give rise to the perception that the transaction may be influenced by the gift.
- Employees involved in a tendering process must refrain from actions which may give rise to an expectation of some favoured treatment from or by any tendering party.
- Under no circumstances must Employees offer or accept money.
- Gifts and entertainment must be of a size that is generally acceptable and free from any suggestion of bribery or secret commission
- Bribing, or attempting to bribe, a public official is a serious crime under Australian law with harsh maximum penalties. The Company may also be liable for breaches by Employees. Employees must ensure that they do not participate in any conduct which may directly or indirectly provide any benefit or advantage to a public official where such benefit is not legitimately due or is intended to influence the public official.

Compliance

- Employees must be aware of, and adhere to, company policies, especially those relating to health and safety, equal opportunity, privacy, trade practices and continuous disclosure.
- In the course of their duties, Employees must comply with relevant laws and regulations.

Privacy

- Employees and MCS Civil must comply strictly with the privacy principles of the Privacy Act.
- Private information about a co-worker, supplier, customer or any other person dealing with MCS Civil must not be discussed without prior written consent.

Note: If an Employee has doubts about any aspect of this code, they must seek clarification from their manager.