



# IMS02.12 Code of Conduct Policy

## 1. Introduction

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

## 2. 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.

### 2.1. Which are:

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

## 3. Employee Responsibilities

### 3.1. MCS Civil Employees are required to:

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

### 3.2. Conflicts of Interest

- 3.2.1. Employees must avoid any personal, financial or other interest which may conflict with their duties and responsibilities at MCS Civil.
- 3.2.2. Employees must Avoid 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 without the permission of the Managing Director.



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3.2.3. Employees must promptly disclose to management any activity which may constitute a conflict of interest.

### 3.3. Company Property

3.3.1. MCS Civil property, funds, facilities and services must be used only for authorised purposes.

3.3.2. 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, unless governed by law or otherwise agreed in writing.

### 3.4. Safety

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

3.4.2. Unsafe work practices must be reported to the immediate manager.

3.4.3. MCS Civil equipment is to be maintained in a safe operating condition.

3.4.4. Protective equipment supplied by MCS Civil must always be correctly used by Employees.

### 3.5. Environment

3.5.1. Employees must comply with relevant legislation and promote environmental awareness, to raise standards.

3.5.2. Employees must comply with the environmental policies of clients.

3.5.3. Employees are to use energy and other resources efficiently.

3.5.4. Employees are encouraged to support community activities in the areas in which they work

### 3.6. Gifts and Entertainment

3.6.1. Employees from time to time, entertain or are entertained, and give or receive gifts during the conduction of their duties.

3.6.2. 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.

3.6.3. 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.

3.6.4. Under no circumstances must Employees offer or accept money.

3.6.5. Gifts and entertainment must be of a size that is generally acceptable and free from any suggestion of bribery or secret commission.

3.6.6. Bribing, or attempting to bribe, a public official is a serious crime under Australian law with harsh maximum penalties.

3.6.7. 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



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provide any benefit or advantage to a public official where such benefit is not legitimately due or is intended to influence the public official.

### 3.7. Compliance

- 3.7.1. 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.
- 3.7.2. During the course of their duties, Employees must comply with relevant laws and regulations.
- 3.7.3. Employees and MCS Civil must comply strictly with the privacy principles of the Privacy Act.
- 3.7.4. 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.***

Authorised Signature

A handwritten signature in black ink that reads "Roy Hendy".

Roy Hendy

06/01/2021



## 4. References

Document Title	Standard/Section No.
Integrated Management System Manual	V2

## 5. Responsibility/Monitoring

Sections 1&2	Managing Director
Section 3	All Staff

## 6. Documentation Required

- IMS17 Legal & Other Regulatory.

## 7. Document Control

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