

# **CODE OF CONDUCT**

**CREATED: May 2024**

---

## 1. Purpose

The purpose of this Code of Conduct (“Code”) is to provide a framework of principles for conducting business and dealing with employees, volunteers, contractors, sub-contractors, and other stakeholders.

The Code establishes a consistent approach to, and common understanding of, the ethics and standards of behaviour expected of all persons in the workplace, which are aligned with the values of AJ Plastering NT Pty Ltd (“AJP”).

## 2. Scope

This Code applies to all employees and volunteers of AJP (referred to as “employees” from herein), and its visitors, contractors, and sub-contractors.

## 3. Policy

AJP is committed to building and upholding its reputation as a leading employer, service provider and business associate within the construction industry.

It is crucial that:

- the legal and regulatory environment in which AJP operates is understood and adhered to;
- a safe, honest and healthy workplace environment exists; and
- positive and professional relationships with peers, customers, suppliers and competitors are cultivated.

Through this Code, AJP can:

- minimise risk to its employees and professional reputation;
- positively influence relationships with its stakeholders; and
- promote business sustainability and growth.

## 4. Code of Conduct

### 4.1. Compliance

AJP is committed to compliance with its:

- legal obligations;
- regulatory requirements;
- relevant codes of practice; and
- internal policies and procedures (including this Code).

If AJP fails to comply with laws and regulations, both AJP and the relevant employee, contractor/sub-contractor may face serious consequences. This could include criminal penalties.

If an employee, contractor/sub-contractor is unsure of applicable laws and regulations, they should contact AJP’s Management Team for further information and guidance.

## 4.2. Ethics

Ethical behaviour is essential to AJP's sustainability and growth. It impacts:

- workplace culture;
- staff retention;
- business relationships;
- community/industry trust;
- financial performance; and
- risk management and liability.

Ethical behaviour and decision making is guided by understanding, honesty and integrity. This helps ensure correct/fair choices are made and the best outcomes are achieved.

Ethical business behaviour can be achieved by adhering to AJP's internal controls, risk management processes, policies and procedures (including this Code).

## 4.3. Conflict of Interest

In the Northern Territory, it is not uncommon for potential conflicts of interest to arise in business. Conflicts of interest can be actual, apparent or perceived.

AJP employees, contractors/sub-contractors must ensure their personal interests do not conflict with the proper performance of their duties while employed/engaged by AJP.

Conflicts of interest can be managed by:

- promptly disclosing any actual, apparent or perceived conflict of interest;
- promptly disclosing a material interest in a customer's, supplier's or competitor's business;
- not participating in conflicting business activities outside of your employment with AJP (without prior disclosure and approval);
- not accepting or offering money, gifts or favours which may influence your business judgement or give rise to perception a business transaction has been compromised by such influence;
- seeking authorisation for gifts and invitations reasonably estimated to be in excess of \$100; and
- keeping accurate and transparent business records.

Any interest which may constitute a conflict of interest must be promptly disclosed to the Director, or a member of the Management Team, in accordance with the Conflict of Interest Policy and Procedure.

Conflicts of interest should be disclosed upon commencement of employment/engagement, as well as when they arise in the course of ongoing employment/engagement.

#### **4.4. Best Practice**

The way in which AJP employees, contractors/sub-contractors conduct themselves directly impacts the way AJP is perceived.

It is important that AJP employees, contractors/sub-contractors conduct themselves in a professional manner and strive for excellence when delivering services on behalf of AJP.

This can be achieved in the workplace by:

- ensuring punctuality and reliability;
- dressing appropriately;
- acting with due skill, care and diligence;
- performing duties competently, efficiently and safely;
- providing accurate and honest information;
- being responsible for decisions and actions;
- ensuring polite, helpful and appropriate behaviour;
- ensuring products and services meet customer expectations and industry requirements; and
- striving to continuously improve skills and knowledge.

#### **4.5. Confidential Information**

While employed/engaged by AJP, an employee, contractor/sub-contractor may have access to confidential information and/or intellectual property regarding:

- AJP (or its related entities);
- customers/clients;
- suppliers and manufacturers; or
- other third parties.

This information/property may be material or intangible.

An employee, contractor/sub-contractor must:

- handle confidential information/intellectual property impartially, with caution and in line with proper performance of their duties for AJP;
- not use confidential information/intellectual property for any unofficial purpose outside of AJP's business operations;
- not use confidential information/intellectual property to obtain a personal benefit or a benefit to a third party; and

- not use confidential information/intellectual property to cause harm or detriment to AJP, any person or body.

These obligations continue after employment/engagement with AJP has ceased.

Exceptions may apply (e.g. with written informed consent, disclosure authority or as required by law).

#### **4.6. Respect**

AJP is committed to ensuring a diverse, inclusive, collaborative and supportive workplace. All views, ideas, cultures and capabilities should be considered and respected.

The health, safety and wellbeing of the team is essential. It is important:

- all occupational health and safety laws and regulations are strictly adhered to;
- appropriate induction and guidance is provided to new/junior employees;
- good examples are set by peers and senior staff;
- clear, achievable responsibilities and goals are assigned;
- open communication and information sharing is encouraged;
- diverse experience is valued; and
- individual needs, professional development and continuous learning is supported.

AJP will not tolerate bullying, harassment, unlawful discrimination or any other offensive conduct. Such behaviour may result in disciplinary action, including termination of employment or contractual services.

#### **4.7. Integrity**

AJP strives to foster an honest, trustworthy and authentic workplace environment, both internally and externally. This is fundamental to ensuring AJP maintains its positive and credible reputation.

The reciprocal relationship between AJP and its employees, contractors/sub-contractors form an essential part of AJP's honesty, trustworthiness and authenticity. It is essential all AJP employees and contractors/sub-contractors, as applicable, are truthful about:

- their skills, experience and capabilities which relate to the duties AJP has employed/engaged them to perform;
- any criminal charges and/or convictions which may impact the duties AJP has employed/engaged them to perform;
- the working hours recorded on timesheets and/or subcontractor invoices;
- the use of leave entitlements e.g. sick or carer's leave; and
- the currency of insurance policies, licences and/or accreditations.

Employees and contractors/sub-contractors must not conduct business on behalf of AJP when under the influence of alcohol or drugs. These substances adversely affect a person's ability to perform their duties and pose significant risk to AJP staff and others. This could result in a serious injury, a dangerous incident or death.

Suspected and/or substantiated intoxication within the workplace will be investigated and dealt with in accordance with the Disciplinary Policy and Procedure. Any injury/incident involving a violation of law will also be referred onto the appropriate enforcement authority.

## 5. Breach of Policy

Any suspected breaches of this Code will be managed in accordance with the Disciplinary Policy and Procedure. This may include counselling, warnings, or termination of employment or contractual services for more serious offences.

Suspected breaches should be reported to the Director, or most senior leader of the Management Team. Failure to report a suspected breach of this policy, or making a vexatious complaint, is a breach of this Code and may result in disciplinary action being taken against an employee, or other relevant action taken against visitors, contractors, and/or sub-contractors.

## 6. Definitions

**Confidential Information** means all the information including trade secrets, intellectual property, marketing and business plans, client and supplier lists, computer software applications and programs, business contacts, finance, remuneration details, data concerning AJP or any of its associated entities or any client of AJP's, finances, operating margins, prospect's lists, and transactions of AJP, but does not include information in the public domain otherwise than through a breach of an obligation of confidentiality.

**Contractor** means a person engaged by AJP to execute work on behalf of AJP and includes subcontractors that are engaged by a contractor.

**Subcontractor** means individuals engaged by the contractor to complete specific tasks on behalf of the contractor.

**Conflict of Interest** means when an employee, contractor/sub-contractor is in a position to be influenced by their private interests when doing their job.

## 7. Related documents

Conflict of Interest Policy


Drugs and Alcohol Policy

Disciplinary Policy

Privacy Policy

Work Health and Safety Policy

Workplace Bullying and Harassment Policy

<b>Signature of Endorsement:</b>	
<b>Name:</b>	Nicole Churchett
<b>Position:</b>	Development Manager, Business and Property
<b>Date:</b>	25 June 2024
<b>Version:</b>	1.0