
Austin Engineering Limited
Effective 27 May 2020



Code of Conduct

Who does this code apply to?

The code of conduct is integral to the way Austin does business and is underpinned by our Core Values. It sets clear expectations for everyone in the company to ensure Austin conducts its business affairs with the utmost integrity.

It applies to all representatives of Austin, including directors, senior executives and employees of the company and contractors acting on behalf of the company (herein after “we”).

Each person to whom this Code applies is responsible for ensuring that Austin consistently achieves the highest standards of business conduct possible and is required to work at all times in compliance with this Code. Austin may take action in relation to any failure to follow the standards in this code, which may include dismissal or termination of contract or legal action.

How will Austin achieve and maintain compliance with its Code of Conduct?

Austin will:

- Establish and maintain policies and procedures, which directors, senior executives and employees of the company and contractors acting on behalf of the company will be required to read, understand and comply with;
- Conduct training on the code of conduct for senior executives, employees of the company and contractors acting on behalf of the company; and
- Require the same high standards of business conduct from Austin’s contractors, suppliers and business partners.

Austin will review the Code of Conduct on an annual basis to ensure alignment with our Core Values.

How does Austin maintain its integrity?

Integrity is one of our Core Values and central to Austin wherever we do business. Our vision is to be the company of first choice for all stakeholders and to this end:

- We do not offer or accept bribes or facilitation payments or engage in any form of corruption, whether directly, through our supply chain or any third party;

- We will never knowingly engage in, condone or ignore any kind of fraud, false claim, deception or dishonest behaviour or allow someone else to do so on our behalf;
- We seek to avoid situations in which our personal circumstances could lead to a conflict of interest. We declare and resolve any potential conflicts as soon as we become aware of them;
- We make sure all gifts and hospitality are within acceptable limits and will never offer or accept anything that could be perceived as a bribe or an attempt to inappropriately influence a business decision;
- We will conduct due diligence on all prospective agents, intermediaries and joint venture partners and only work with third parties whose policies and standards are in accordance with our own;
- We welcome fair, open and honest competition and refuse to engage in practices that try to achieve an unfair competitive advantage;
- We trade lawfully and properly at all times complying with all trade regulations and restrictions, meeting export and import requirements when moving goods or services between countries;
- We are committed to developing mutually beneficial relationships with suppliers who share our values and adhere to our code of conduct;
- We act with integrity and transparency in all our dealings with government officials;
- We treat our clients with the same respect and professionalism we expect from each other and strive to build strong and lasting relationships that add value; and
- We understand that our relationships with all stakeholders are important to delivering a successful outcome for all our stakeholders.

How does Austin ensure safety and teamwork?

We believe our high standards deliver a healthy and safe culture. At all levels within the company we want everyone to make safety personal.

We are committed to building an environment where everyone is treated with honesty and respect. We all have a unique blend of experience, talents and perspectives and this diversity is one of our key business strengths.

With teamwork as a core value we believe that together we can make a difference by ensuring that:

- We will not compromise the safety of anyone involved in or affected by our operations; health and safety is central to the success of our business;
- We are committed to a future free from incident and injury, and the effective management of drug and alcohol misuse is an integral part of this;
- Austin is committed to equality, diversity and inclusion and being an employer that maintains the highest standard of employment practice, by aiming to employ a workforce that reflects the diverse society in which we live and work;
- We treat all colleagues with respect and dignity and do not tolerate any form of harassment or bullying; and
- We are committed to upholding the human rights of all those who work with us and for us and comply with international conventions regarding human rights and child labour.

**What are
Austin's duties
as a global
company?**

We are committed to operating a sustainable business by complying with social, economic and environmental laws and regulations, alongside developing stringent standards of our own and will achieve this by:

- Acknowledging that everything we do has an impact on the environment and we will work to stringent standards to make a positive contribution to environmental protection whilst raising standards for the industry as a whole;
- Respecting the communities we operate in. We value our reputation and we are aware that our products and services impact on people and communities; we listen to their concerns and we act on them wherever we can;
- Aiming to have a positive and long-lasting effect in the communities in which we live and work by aiming to leave a positive legacy that will be of benefit for many years; and
- Taking our social and economic responsibilities seriously and one way is by paying our taxes when they are

due in the countries where we operate.

How do we keep our data and assets safe?

When we are entrusted with personal information and company data, we have a duty to keep it safe. We achieve this by:

- Respecting an individual's right to privacy and treating all personal information we receive responsibly, with integrity and in accordance with data protection and privacy laws.
- keeping confidential information safe and protecting it from unauthorised disclosure
- using our information technology and communications systems appropriately, ethically and responsibly
- ensuring we have suitable internal controls in place in our business processes and that our records and reporting processes are complete, accurate and transparent
- We value all our assets and resources – tangible and non-tangible – and will protect them from improper and unauthorized use
- Ensuring that our communications will be timely, honest and without misrepresentation

Who should you tell if there is a breach of the Austin Code of Conduct?

If you believe any person has breached this code, you should report the breach to an Austin supervisor, manager or an officer to whom the person reports and/or the company secretary and/or anonymously to

Austina@Austineng.com.au

Please also consult the Austin Engineering Whistleblower Policy

Definitions	Austin or the company	Austin Engineering Ltd ACN 078 480 136, its subsidiary companies from time to time, operating divisions, business units and joint ventures (where relevant).
	Board	The board of directors of Austin.
	Chair	The chair of the board.
	Director	A director of the company.
	Code	This code of conduct as amended from time to time.
	You	Directors and employees of and contractors to Austin.