

FICO Australia Pty Ltd CODE OF CONDUCT

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FOREWORD

Managing Director's Statement

This Code of Conduct (Code) is an open statement about how our organisation expects to be known and judged through our values and behaviours.

Every employee and contractor is valued for their positive contribution. No matter what your role is, your attitude, presentation, behaviour and actions shape the way our company is perceived and influence our reputation as an essential services provider.

I seek your commitment to understand, endorse and uphold our stated values and Code so that our customers and stakeholders have confidence not only in our technical capabilities as well as the way we conduct ourselves in business and with each other.

Ultimately, my objective is for FICO to be a place of work where you have opportunity for growth and job satisfaction which in turn will make our company successful and sustainable in a competitive field.

All FICO employees and contractors will be issued with a copy of this Code (and any updates) to ensure that we all know what is expected and how to represent FICO Australia.

Thank you for your commitment and support.

James McLennan Managing Director

FICO values

The following values outline how FICO Personnel will conduct themselves to promote the Company as a technically competent, reliable, reputable and service focussed organisation.

Professionalism – demonstrate professionalism by:

- I. Promptly respond to requests for information or services
- II. Maintaining confidentially
- III. Representing the company's image professionally
- IV. Acting in a proactive and responsible manner at all times

Integrity –demonstrate integrity by:

- I. Being honest, open and transparent
- II. Avoiding real or perceived conflicts of interest
- III. Reporting improper conduct

Accountability - demonstrate accountability by:

- I. Working to clear objectives in a transparent manner
- II. Accepting responsibility for decisions and actions
- III. Using work resources effectively and efficiently
- IV. Reporting issues of concern in a timely manner
- V. Submitting themselves to appropriate scrutiny
- VI. Complying with Company policies, procedures, and lawful directions

Respect – for clients, colleagues, service providers and other stakeholders

- I. Treating them fairly and objectively
- II. Ensuring freedom from discrimination, harassment, vilification and bullying



1. Introduction

1.1 Binding Code of Conduct

This Code of Conduct prescribes the behaviour expected of employees and contractors (personnel). Personnel are required to familiarise themselves and act in accord with the Code of Conduct. The Code of Conduct is binding. Non-compliance and or contravention may constitute misconduct.

1.2 Pre-employment

The Code of Conduct can only bind personnel from the commencement of their employment or engagement as a contractor.

1.3 Post-employment

Although the Code of Conduct does not continue to bind personnel after they have left employment or ceased providing contract services, personnel will continue to be bound by the provisions of confidentiality (see 2.2 "Privacy and confidentiality").

1.4 Breach of this code

This Code is based on FICO's stated values and relates to both performance and conduct behaviours. Failure to behave in the ways described in the Code of Conduct may lead to performance management and/or disciplinary action.

2. Demonstrating Professionalism

2.1 Customer service

Personnel provide the highest level of customer service by ensuring that they undertake work in a competent, proactive, timely, safe and responsible manner.

2.2 Privacy and confidentiality

FICO Personnel understand the importance of privacy and confidentiality. Confidential information requires special treatment and protection. FICO Personnel are required to enter into confidentiality agreements to protect commercial in confidence information of FICO and its customers.

FICO Personnel that receive and manage confidential and private information ensure that it will not be used to advantage a prospective employer or business.

Although the Code of Conduct does not continue to bind FICO Personnel after they have left the Company or ceased to provide services for the Company, Personnel will continue to be bound by the provisions of confidentiality.

Non-compliance with this requirement will be considered a serious breach of this Code and may result in disciplinary action.

2.3 Personal Presentation

FICO Personnel are required to present at work "fit for work" and ensure they wear assigned work clothes (including safety apparel) and able to perform their duties competently and safely (see 3.5 for "fit for work"). Presentation includes "a clean shaven and clean presentation".

2.4 Problem solving

Personnel are required to be proactive and use their judgement to resolve work issues taking into account occupational health and safety concerns. When in doubt, issues must be escalated as a priority.



3. Demonstrating integrity

3.1 Honesty and financial probity

Personnel are required to always perform their duties honestly. This includes ensuring time sheets are accurate and reimbursements for petty cash or other work-related expenses are accurate, validated and approved.

3.2 Conflict of interest

A conflict of interest can be actual, potential or perceived. This relates to circumstances where an individual is or could be directly influenced or where it is perceived that they may be influenced.

FICO Personnel must ensure that they do not place themselves in a position where their integrity may be challenged such as offering gifts or favours to suppliers or customers to gain unfair commercial advantage. FICO Personnel demonstrate integrity by not seeking personal advantages by working directly for a customer which may undermine FICO customer relationships and future business.

FICO Personnel do not - for themselves or others - seek or accept gifts or benefits that could be reasonably perceived as influencing them. Personnel unsure about accepting a gift or benefit from a customer, potential customer or supplier are to firstly discuss and seek advice from the Managing Director.

3.3 Outside Employment

Full time Personnel are required to seek approval to undertake other employment. The Managing Director's decision will be based on evidence that the employee is not performing work that conflicts with FICO business or that any other employment will not affect the employee's ability to perform the inherent duties of their full time role.

Part time employees are also required to advise the Managing Director if they work for another organisation and to make an undertaking that the work they undertake is not in competition or conflict with FICO's business.

Personnel must ensure that they do not perform approved (or otherwise) outside work using FICO vehicles, systems, equipment or on FICO premises or during hours of paid work at FICO.

Breaches of this section may result in serious misconduct and disciplinary action.

3.4 Reporting unethical behaviour

FICO Personnel must comply with legislation, policies and lawful instructions in the performance of their work. FICO Personnel must report workplace behaviour to the Managing Director that violates any law, rule or regulation or represents corrupt conduct, mismanagement or danger to public health or safety or to the environment.

3.5 Criminal offences and/or fines

Personnel must advise the Managing Director if they are charged with a criminal offence, which is punishable by imprisonment or, if found guilty, could reasonably be seen to affect their ability to meet the inherent requirements of the work they are engaged to perform.

Personnel using FICO vehicles are responsible for payment of any parking or speeding fines incurred by them. Repair of motor vehicles due to accidents will be in accordance with the Company's motor vehicle insurance policy. Personnel fined or involved in an accident alcohol or drug affected will be personally liable for costs of repairs to motor vehicles and/or plant and equipment.

3.6 Drugs and Alcohol

The Company's core business is to provide a range of essential services. This typically places higher standards of conduct and behaviour on its personnel than many other industry sectors due to the increased risks associated with workplace incidents and/or accidents.



FICO Personnel must carry out their work safely and avoid conduct that puts themselves or others at risk. The misuse of alcohol, prescribed drugs, illegal drugs and other substances is an issue for both employers and employees as it may impact on both work and personal life and in some cases, the reputation of their employer.

Personnel who are on medication that could affect their work performance or the safety of themselves or others must inform the Managing Director to ensure any necessary precautions or adjustments to work are considered.

FICO has a zero tolerance approach to the misuse of alcohol, illicit drugs or other substances by FICO Personnel when they are at work or when they are engaged in work related activities.

FICO Personnel tested positively for illicit drugs, alcohol or other substances including on customer sites that undertake random testing regimes will prevent them from fulfilling FICO contractual obligations. In these instances, FICO Personnel may have their services summarily terminated by FICO for negligence and financial detriment.

FICO Personnel experiencing personal issues that may affect their ability to perform the inherent requirements of their role may access the Company's Employee Assistance Program. Information on this confidential service is available on request.

4. Demonstrating accountability

4.1 Working to clear objectives

Personnel understand the objectives of their role. If unclear, personnel should discuss this with their supervisor to seek clarity and direction.

4.2 Being responsible for decisions and actions

Personnel make decisions and take actions within the scope of their authority that are lawful and consistent with relevant legislation and Company policy. They will consider any impact of their decisions or actions on the reputation of the Company and to the services provided to customers.

4.3 Work resources and equipment

Personnel must ensure that Company plant and equipment is used for FICO business and in accordance with manufacturer's instructions. Personnel will achieve value for money, use resources in the most effective way possible, and identify opportunities for improvement to achieve best possible efficiency and responsiveness.

Reasonable personal use of mobiles, tablets, internet and email during unpaid work breaks is acceptable. Personal overseas charges will be paid to the Company be the employee.

Personnel provided with a vehicle are to ensure that it is maintained in a clean and good working order. Service records must be maintained and followed. Cleaning vehicles is the personal responsibility of the employee in their own time.

Vehicles must be garaged off the street and securely locked. Equipment such as ladders etc must not be left on the vehicle unless secured in a lockup garage.

Theft of tools and equipment in instances where the vehicle was not securely garaged out of hours will be replaced at cost by the employee.

Non-compliance or negligence to this section may constitute misconduct.

4.4 Ability to meet inherent job requirements

Personnel must notify the Managing Director of any loss, suspension of, or change to, a registration, accreditation, licence or other qualification that affects their ability to meet relevant essential job requirements or to perform their duties.



4.5 Compliance

Personnel ensure they are aware of and comply with all legislation, FICO Company policies and procedures relevant to the performance of their duties in particular occupational, health and safety requirements.

Breaches of this section may result in serious misconduct and/or disciplinary action.

6. Demonstrating respect

6.1 Fair and objective treatment

FICO Personnel are fair, objective, and courteous in their dealings with customers, suppliers, stakeholders and colleagues.

6.2 Equity and diversity

FICO Personnel will follow the spirit as well as the letter of the law relating to discrimination, harassment, bullying, vilification, and victimisation. Valuing and promoting diversity is an important element of demonstrating respect.

FICO Personnel are required to report any incidents that breach this section. FICO management will determine action required which may include a formal investigation.

FICO Personnel will adhere to customer site-specific policies and procedures in relation to OH&S, Equal Opportunity and Diversity and undertake inductions as required.

Breaches of this section may result in serious misconduct and/or disciplinary action.

Acknowledgement

l,	acknowledge that I have read and understood the FICO	
Australia Code of Co	uct and will follow and adhere to the standards and principles outling	ed.
Name:		
Signature:		
Date:		