



Insuraplex

RESTORING THE PAST, BUILDING THE FUTURE



Cheltenham and East Keilor



(03) 9337 7884



reception@insuraplex.com.au



ABN 44 620 846 344

EMPLOYEE / CONTRACTOR CODE OF CONDUCT

Introduction

This code of conduct applies to all employees/contractors and directors (“Employees / contractors”) of the Company. 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 / contractors, and other stakeholders.
- to avoid conflicts of interest; and
- to comply with the letter and the spirit of the law.

Responsibilities

Employees/ contractors are required to:

- promote the interests of the Company;
- respect their co-workers, customers, suppliers & other service providers;
- perform their duties with skill, honesty, care & diligence, using authority in a fair and equitable manner
- comply with the spirit as well as the letter of the codes of conduct applying to the professions of individual Employees / contractors;
- abide by policies & procedures, instructions and lawful directions that relate to their employment and duties;
- promote diversity and inclusion in regard to employment and procurement of materials/supplies
- comply with Australian labour laws specifically around equal opportunity & diversity & inclusion;
- not employ a person/people that cannot legally work in Australia under Australian labour laws;
- not directly or indirectly employ low skilled foreign or domestic migrant workers;
- not engage in any form of forced labour, child labour or human trafficking;
- not withhold worker identity and immigration documents
- not engage with recruiters unless they share common policies and procedures around promotion of Insuraplex fair work practices and comply with Australian workplace laws



Conflicts of Interest

- Employees / contractors must avoid any personal, financial, or other interest which may be in conflict with their duties and responsibilities to the Company.
- Any interest which may constitute a conflict of interest must be promptly disclosed to an appropriate senior manager.
- Accepting any external appointment, working for another organisation, or conducting a business that detracts from an employee's ability to fulfil their specified role for the Company is not permitted without the permission of the Directors.
- Employees / contractors must ensure that all transactions comply with the law.

Confidentiality

- Employees / contractors must ensure that all transactions comply with the law

Company Property

- Company 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 the Company is the sole property of the Company

Public Statements

- No employee is entitled to make any public statement without written approval of the Directors.

Safety

- Employees / contractors must observe and comply with all safety practices and procedures introduced by the Company to maintain a safe workplace.
- Unsafe work practices must be reported to the immediate manager.
- Company equipment is to be maintained in a safe operating condition.
- Protective equipment supplied by the Company must be correctly used at all times by Employees / contractors.

Environment

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



****Please refer to our Environmental Policy document available on our website for further information.****

Gifts and Entertainment

- Employees / contractors, 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 / contractors involved in a tendering process must refrain from actions which may give rise to an expectation of some favored treatment from or by any tendering party.
- Under no circumstances must Employees / contractors 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, is a serious crime under Australian law with harsh maximum penalties (including imprisonment for individuals involved). The Company may also be liable for breaches by Employees / contractors. The definitions of a bribe are very broad. Employees / contractors must ensure that they do not participate in any conduct which may directly or indirectly provide any benefit or advantage where such benefit is not legitimate.
- Employees/contractors or any representative of the Company may not provide any financial product advice to clients. The company does not represent that it has such authority. Relevant parties to be notified if client is seeking financial needs as a result of a claim.

Compliance

- Employees / contractors 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 / contractors must comply with relevant laws and regulations of Australia.

Privacy

- Employees / contractors and the Company 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 the Company must not be discussed without prior written consent. Please note that any data collected with respect to customers is deleted post the completion of any works requiring the retention of information.

Modern Slavery

- Insuraplex supports the abolition of Modern Slavery including all forms of forced labour, bonded labour and human trafficking both within our own operations and suppliers that



Insuraplex

RESTORING THE PAST, BUILDING THE FUTURE

we work with from a supply chain perspective. Should an employee or supplier become aware of any instance of Modern Slavery it must be reported to a Director or the General Manager of Insuraplex, non-reporting will be considered as a breach of our code of conduct policy.

- Please note that any report can be completed confidentially, and the reporting person will be afforded protections under the law as a whistle blower.

****Please refer to our Privacy Policy document available on our website for further information.****

Breaches of the Code

- Employees / contractors have a duty to observe the code and ensure that no breaches occur. Breaches require immediate attention and Employees / contractors have a duty to report known or suspected breaches of the code.
- A complaint or disclosure about an alleged breach of the code should be in writing and contain details about the date, time and nature of the alleged breach and include any available support material. All reports are treated as confidential.
- The Company will protect any “whistle blower” who reports a violation in good faith and on reasonable grounds and will comply with laws relating to “whistle blower protection”.
- The allegation should be made to the Employee’s immediate supervisor, or if the Employee believes the immediate supervisor may be implicated, to a Director.
- The Employee will be informed of the outcome of the investigation.
- Insuraplex reserves the right to terminate an employee’s contract or a sub-contractor agreement should it be proven that they have intentionally breached the Employee/Contractor Code of Conduct.

Conclusion

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

Further links

OH&S Management Plan – link on website

Industrial Relations / Harassment & Discrimination Policy -

<https://insuraplex.com.au/assets/docs/Industrial-Relations-Complaint-Process.pdf>