



**WORKFORCE**  
INTERNATIONAL GROUP

# Employee Code of Ethics and Conduct



**WORKFORCE**  
**ROAD SERVICES**



**TRAFFIC GROUP**  
**AUSTRALIA**

Document	Dept	Owner	Issue	Issued	Last review	Page
Employee Code of Ethics and Conduct	Corp.	CEO	5	March 2017	12/8/2020	1 of 8

Uncontrolled Outside Intranet

## 1. Introduction

This code sets standards of behaviour expected of you and provides a guide to solving issues that may arise in the course of your work. The code is designed to help us maintain our reputation for professionalism, integrity and fairness and to guide us in the performance of our duties and in our decision making.

## 2. Values Embodied in the Code

The code rests on the assumption that, in performing your duties as an employee of the company, you act with integrity, are honest, conscientious, efficient, fair, compassionate and support the company's corporate values, which are:

### **Innovation and Leadership**

We value staff who demonstrate innovation and leadership in a consultative and supportive way.

### **Integrity**

We consistently act honestly and ethically.

### **Service commitment**

We are responsive in the way we deliver our services.

### **Delivery**

We focus on working collaboratively to achieve desired outcomes in a timely manner.

### **No surprises**

We anticipate issues and opportunities that will impact on our work and alert those people who will be affected and equip them to deal with those issues.

### **Fairness**

We treat each person with fairness and respect.

## 3. Rights of employees

You need to know the responsibilities of your employment and be aware that they impose certain conditions on you. These include adherence to this Code of Ethics and Conduct. You should be aware that a breach of the Code of Ethics and Conduct may result in counselling or disciplinary action under the terms of your employment.

## 4. Personal and Professional Behaviour

You are expected to:

- carry out your duties in an efficient, effective and economical manner;
- comply with all relevant legislative, industrial, policy or administrative requirements and financial delegations;
- keep up to date with advances and changes in your area of expertise;
- provide all necessary and appropriate assistance to your colleagues;
- treat clients, candidates and other employees with courtesy; and
- report unethical behaviour or suspected corrupt conduct to senior management.

If you have an ethical or moral objection to a task you are asked to undertake, you should seek resolution of the issue through discussion with a senior manager.

When dealing with colleagues or members of the public, you must not harass or discriminate on the grounds of sex, marital status, pregnancy, age, race, colour, nationality, ethnic or national origin, physical or intellectual impairment, sexual preference, religious or political conviction or carer's responsibilities. Supervisors and managers should understand and apply equal employment opportunity principles.

For more information please refer to the company's Workplace Behaviour Policy and Grievance Policy.

Document	Dept	Owner	Issue	Issued	Last review	Page
Employee Code of Ethics and Conduct	Corp.	CEO	5	March 2017	12/8/2020	2 of 8

## 5. Fairness and Equity

You must make sure all work issues you handle are dealt with in accordance with approved policies and procedures and without discrimination on any grounds.

## 6. Accountability

You are responsible for your own acts and omissions and are accountable for them. If you are a manager or supervisor you have the responsibility to ensure that employees you supervise understand the duties of their positions, policies and procedures, the results expected of them, their obligations under this Code of Ethics and Conduct and the limits of their administrative and financial delegations.

Managers and supervisors have a responsibility to adhere to and promote the Code of Ethics and Conduct through guidance and example.

## 7. Conflicts of Interest

You should make every effort to ensure that opportunities do not arise for your personal interests, associations and activities (financial or otherwise) to conflict with the proper exercise of your duties.

In many cases only the individual concerned will be aware of the potential for conflict. Any perceived potential or actual conflict of interest is to be notified to your supervisor or a senior manager. Examples of conflicts of interest include:

- providing advice in support of a decision that would have financial or other benefits for you, your friends, relatives or business partners;
- exercising delegated powers to purchase goods, services or equipment from a supplier who then provides you with a hidden benefit, e.g., purchase of a computer from a supplier who then provides you with a laptop computer for private use; and
- recommending a contract is issued to a supplier who provides you with a benefit, eg, access to sporting events or other hospitality.

## 8. Acceptance of Gifts, Gratuities and Hospitality

Workforce international places great value on the company's reputation for integrity. So it is important that colleagues, clients and the wider community are satisfied that all Workforce International employees behave fairly, honestly and in good faith at all times. Accordingly, employees must not solicit suppliers, clients or other business associates for personal gain of any kind.

Modest gifts such as advertising novelties may be accepted, so long as it is clear that no commercial gain or advantage is expected in return. However, the acceptance of gifts or gratuities of more than a nominal value, or excessive entertainment, may not be accepted without the prior approval of the CEO, Divisional General Manager or their authorised representative. Employees must never accept gifts of money.

In all instances the offer or receipt of gifts, gratuities and entertainment of any significant value, must be reported to your immediate line manager.

## 9. Offering Payments or Inducements

It is forbidden for any Workforce International employee to offer, promise, authorise, approve or condone the use of corporate funds or property in order to obtain business for Workforce International.

This includes the payment of money or the giving of anything of value to any person as a kickback or in order to influence them to act or fail to act in their official capacity. It also applies to the

Document	Dept	Owner	Issue	Issued	Last review	Page
Employee Code of Ethics and Conduct	Corp.	CEO	5	March 2017	12/8/2020	3 of 8

payment of money or the giving of anything of value to any person who will apply the payment or gift (in whole or in part) directly or indirectly to these activities.

Failure to observe to comply with these codes of practice may result in disciplinary action, even dismissal

## **10. Public Comment**

Media enquiries regarding any aspect of the company's operations should be referred to the Chief Executive Officer, unless your duties specifically include handling such enquiries. In such cases, you should confine yourself to the facts within your area of responsibility and avoid discussing other aspects of company policy or offering personal comment.

## **11. Privacy Policy**

The Privacy and Personal Information Protection Act 1998 establishes a system for handling personal information. The key provisions of the Act are the Information Protection Principles (IPPs), which create obligations and restrictions relating to the collection, retention, use and disclosure of personal information. It is important for you to understand the impact of the Act on the company's operations, as employees who breach the Act may be held accountable for their actions.

## **12. Security of information and premises**

Security of information held by the Company, e.g. candidate and employee records, payroll information etc. is critical in ensuring our need to comply with our privacy obligations and fairness to individuals. You should ensure that you are familiar with the company's policies and procedures regarding the storage, use and distribution of information held by the company. This includes information held in both hard copy and electronic formats.

You may not access information or records that are not relevant to the execution of your duties. You must not take the company's files or other records home or away from the company's premises without the consent of your supervisor. If in the course of your duties you need to remove files or records from the company's premises, you must maintain the integrity and confidentiality of those documents.

You need to ensure that you are familiar with and follow the company's procedures in respect of the access of employees and visitors to the company's premises and ensure that company premises are always secured after hours.

## **13. Use of Company Information**

You must take care to maintain the integrity and security of company documents and information entrusted to you in the course of your duties. Such documents and information must only be used in the legitimate exercise of your functions. You may only disclose company information when you have been given the proper authority or when required to do so by law.

## **14. Use of the Company's Resources**

Company resources include company motor vehicles, computer hardware and software, mobile phones, facilities and office equipment, stationery, furniture and furnishings, goods, supplies and services. As an employee you are expected to:

- be efficient and economical in your use of the company's resources;
- not permit misuse of company resources by others;
- obtain permission before any use of the company's facilities and equipment for personal purposes, beyond what is authorised; and
- ensure you have the necessary authority before incurring or authorising any expenditure on behalf of the Company.

Document	Dept	Owner	Issue	Issued	Last review	Page
Employee Code of Ethics and Conduct	Corp.	CEO	5	March 2017	12/8/2020	4 of 8

### **Acceptable Use**

All usage of the company's facilities should be lawful, appropriate and ethical. The company's facilities are not to be used in any way that:

- is misleading or deceptive;
- could damage the company's reputation;
- could result in victimisation, harassment or vilification;
- is offensive, obscene, threatening or defamatory;
- violates regulations or laws - including 'computer hacking'; or
- is intended to have a destructive effect on storage, processing or communication network facilities.

### **Private Use**

Computers, telephones and other equipment and facilities are available to allow employees to perform their duties and should, with the exception of the 'private use' concession, only be used when carrying out your duties.

A limited, 'reasonable' amount of private use of the company's facilities is allowed so long as the 'reasonable' private use conforms to the 'acceptable use' conditions described above. Examples of 'reasonable' private use include:

- Using internet resources for short periods during breaks or outside normal working hours. (Unattended downloads or other unattended use of resources is not considered 'reasonable'.)
- Using the telephone or facsimile for private calls, if they are short, infrequent and do not unduly interfere with work.

**The company's Computer, Internet and Email Usage Policy is attached to this Code of Ethics and Conduct.**

### **Monitoring**

Personal use of the company's communication devices is not considered private and in using this equipment you do not have the same personal privacy rights as you have when using your own personal communication devices.

Firewall software automatically monitors and records all incoming and outgoing traffic, including details of Internet sites accessed and transmission details of emails sent and received. These firewall logs are regularly inspected to make sure the policy is being followed. Internet usage is reported to the CEO.

## **15. Dress Code and Appearance Policy**

In support of the Workforce International Group of companies, all staff have a responsibility to maintain a standard of dress that enhances the professional image of the organisation in all its dealings with customers and clients. You are required to be well-groomed and neat.

The purpose of our policy is aimed to enhance our image at work and in the marketplace. It is also intended to minimise the risk to health and safety in the workplace which may arise from inappropriate dress and/or not adhering to Personal Protective Equipment (PPE) and or/hygiene requirements.

The appropriate style of dress will be dependent on such matters as: level of contact with clients, candidates and/or visitors to the company's premises. In the case of meetings held on premises other than the company's, e.g. client site visits or meetings with suppliers, the style of dress should be appropriate to the occasion and the particular situation.

Please refer to the [Dress Code and Appearance Procedure](#), and corresponding policy, on the Intranet for further information.

Document	Dept	Owner	Issue	Issued	Last review	Page
Employee Code of Ethics and Conduct	Corp.	CEO	5	March 2017	12/8/2020	5 of 8

## 16. External Employment

In all cases when additional employment is considered, you should give the company first consideration and avoid situations that may give rise to, or appearance of, a conflict of interest. For this reason any intention to enter into secondary employment must first be approved by the Group's CEO. (See WIG's Secondary Employment Policy on the Intranet)

## 17. Reporting Wrongful Behaviour

You have a responsibility to notify your supervisor or an appropriate senior manager of any unethical behaviour or wrongdoing by another employee.

## 18. Leaving the Company

When leaving the company, you must return all property of the company that is in your possession. After leaving you must not misuse any information gained as a consequence of your employment with the company.

### References

- Workplace Behaviour Policy
- Confidentiality Policy
- Dress Code and Appearance Policy
- Dress Code and Appearance Procedure
- Secondary Employment Policy
- Computer Internet and Email Usage Policy



Ray Roberts  
Chief Executive Officer  
12 August 2020

Version	Date	Author	Changes Made Section Modified and Details of Amendment	Approval
1/2	5/09/2008	G. Hughes	- Original WFI version Employee Code of Conduct	R. Roberts
2	25/02/2013	G. Hughes	- Changed format to match corporate structure - Insertion of Computer Internet and Email Usage Policy at end of document	R. Roberts
3	1/3/2014	G. Hughes B. Jordan	- Reference to Workplace Behaviour Policy and Grievance Policy - Document name change to include 'Ethics'	R. Roberts
4	7/08/2015	G. Hughes B. Jordan	- More information added to section 16 – External Employment. - Reference to Secondary Employment Policy - Update to Computer Internet and Email Usage Policy at end of document	R. Roberts
5	23/03/2017	G. Hughes B. Jordan	- Update to Section 15 – Dress and Grooming Code - Reference to new Dress Code and Appearance Policy & Procedure - Addition of References section	C. Manson R. Roberts

Document	Dept	Owner	Issue	Issued	Last review	Page
Employee Code of Ethics and Conduct	Corp.	CEO	5	March 2017	12/8/2020	6 of 8

# COMPUTER, INTERNET AND EMAIL USAGE POLICY

## COMPANY POLICY AND GUIDELINES

This document provides guidelines and policies for Workforce International employees and contractors using company-owned computers, printers and related computer equipment and network devices, the company Intranet, Internet and Email services.

These guidelines are designed to minimise the inappropriate use of Workforce International resources and prevent loss of information.

## OWNERSHIP AND APPROPRIATE USE

Employees will be provided with access to the Workforce International private network, information systems and software packages to complete their duties. It is the responsibility of each individual to ensure that the passwords which are provided are not disclosed to other employees or third parties. If you believe that any of your user accounts have been compromised, you should change your password and advise the Information Technology Department immediately.

As part of your job function, you will be using Workforce International-owned computers, printers and related computer equipment and network devices. These devices are the property of Workforce International and neither the hardware nor software may be modified, altered or moved without your departmental manager's permission.

To protect the loss of information, all employees must save documents in designated network drives (e.g. O: Drive, R: Drive or H: Drive). Storage of information on local devices (e.g. C: Drive), including laptops, desktops, memory cards and other portable devices is strictly prohibited.

To prevent computer viruses from being transmitted through the company's computer system, unauthorised downloading of any software is strictly prohibited. This includes, but is not limited to instant message and remote control programs. Only software registered and/or approved through the Information Technology Department may be installed on Workforce International computers.

Workforce International may use software which is hosted by a third party and provided as a subscription service (Software-as-a-Service). If you are provided with access you must ensure that the service is accessed from a secure environment, i.e. branch network. Since these services are generally limited to concurrent users and/or include data download quotas, access to these services should be on an as-needs-basis. When you are finished using the service, use the appropriate "logout" mechanism to ensure your session is closed.

## Internet - Acceptable Use Policy

It is acceptable for company employees to access the Internet in order to gather information of value to Workforce International; for professional development, corporate, government, union or customer-related research and communicating with Workforce International customers and suppliers.

## Internet Use Guidelines

Internet access is *for business use only* and is to be used in a responsible, efficient manner. It must not be used for sending, receiving or displaying text or graphics which may reasonably be construed as offensive.

- Access to the Internet must be through an approved firewall.
- All PC's connecting to the Internet must have virus scan software resident in memory.
- Files downloaded from the Internet must be scanned for viruses upon receipt and prior to transfer to other individuals or organisations.
- Under no circumstances will employees give out corporate credit card numbers over the Internet.

Document	Dept	Owner	Issue	Issued	Last review	Page
Employee Code of Ethics and Conduct	Corp.	CEO	5	March 2017	12/8/2020	7 of 8

## **Email - Acceptable Use Policy**

It is acceptable to use company Email resources to send and receive information of value to Workforce International, for communicating with other Workforce International employees, customers and/or business partners and the dissemination of relevant corporate information.

### **Email Use Guidelines**

Whilst there is no objection to Workforce International Email being used for limited amounts of personal communication, it is primarily for employee business use and is to be used in a responsible and efficient manner.

- Any email, which contains material, which could be deemed sexually inappropriate or explicit, defamatory, racist or discriminatory is expressly forbidden to be sent through company Email.
- Email which could be considered a "Chain Letter" is not to be forwarded or distributed through the Company Email.
- Email which solicits money or donations from Workforce International employees that has not been approved for distribution by the C.E.O. or their nominated representative is not to be sent through the company Email system.
- Email which is considered to be "spam" is not to be forwarded or distributed through the company Email system.
- Confidential Workforce International or customer information must be encrypted and transmitted over the Internet in a secure manner.
- All PC Email file attachments received from the Internet must be virus scanned immediately after receipt.
- Under no circumstances should Email be used to collect or provide credit card information.

While Workforce International encourages the use of email to communicate within Workforce International, employees who have given their notice to leave Workforce International but continue to work up to their departure date are not permitted to use Corporate email as a forum for "parting shots" upon leaving.

### **MONITORING AND DISCIPLINARY ACTION**

All employees should be aware that Internet and Email usage and/or content may be monitored and/or logged. Any suspected inappropriate use of services and/or security violations will be investigated and improper use or violation of above policies and guidelines may result in disciplinary action and could be used as grounds for dismissal.

Any Workforce International employee who has a question, concern or complaint regarding the content or use of Workforce International Email or Internet usage should contact their Department Manager.

**A COPY OF THIS POLICY CAN BE FOUND ON THE WORKFORCE INTERNATIONAL INTRANET SITE.**



Ray Roberts  
Chief Executive Officer

Document	Dept	Owner	Issue	Issued	Last review	Page
Employee Code of Ethics and Conduct	Corp.	CEO	5	March 2017	12/8/2020	8 of 8