



SCOPE

The requirements of this standard apply to all Tutt Bryant Group Limited (TBG) operations, including all Divisions, business units, personnel and subcontractors.

OBJECTIVE

This standard describes the minimum acceptable conduct of personnel and business practices, referred to as the 'Code of Conduct' to build and sustain our corporate integrity, reputation and success.

CONTROL MEASURES

Code of Conduct Principles

It is expected that all individuals or entities controlled by TBG, including all TBG employees and representatives (such as contractors and agents), follow the Code of Conduct principles outlined below in all aspects of business activities, including relationships and dealings that are in connection with TBG:

1. Comply with all applicable laws, regulations, standards and codes of practice.
2. Comply with all relevant parts of the TBG Integrated Management System (IMS) that apply to each business task or activity.
3. Act in the best interest of TBG in alignment to the TBG Vision, Mission, Business Objectives, Core Values, which includes the undertaking and promotion of ethical and responsible decision-making (see [TBG-BPO-STD-001 Business Objectives Values and Strategy](#)).
4. Never act without proper authority contrary to [TBG-FAA-STD-005 TBG Authority Matrix](#).
5. Act with integrity by being consistently honest, trustworthy and accountable.
6. Avoid any conflict of interest, whether real or perceived.
7. Avoid behaviour which is, or might reasonably be perceived as discriminatory, harassing, bullying or intimidating (see [TBG-CS-POL-002 Workplace Bullying, Harassment and Discrimination Prevention Policy](#)).
8. Demonstrate respect for others by being courteous, fair and responsive in all dealings with stakeholders.
9. Neither provide, nor receive, gifts (other than gifts of nominal value or corporate gifts that are appropriately authorised) and payments that compromise one's integrity or may be considered corruption or bribery with a third party (see [TBG-CS-POL-003 Anti-Bribery, Corruption and Fraud Control Policy](#)).
10. Neither use, nor allow the use of, TBG's assets and resources for other than authorised purposes.
11. Take an active interest and proactive risk-based approach to the protection of the health and safety of people, the environment, and TBG's assets and resources.
12. Treat confidential information obtained in the course of business with upmost protection and care, and only use it for authorised purposes (see [TBG-CS-POL-006 Privacy and Confidentiality](#)).
13. Never make any representation on behalf of TBG, including making public statements, without proper authority.
14. Never undertake fraudulent, corrupt or improper activities (see [TBG-CS-POL-003 Anti-Bribery, Corruption and Fraud Control Policy](#)).
15. Encourage and support others to follow all company policies and procedures and raise awareness of appropriate methods for reporting improper conduct (see [TBG-CS-STD-007 Whistleblower Protections](#)).

Application and further Information

All TBG personnel and representatives shall comply with this Standard. All roles are responsible for fostering a work environment that meets all the above stated principles.

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Further information on terms or requirements within this Standard are supported by [TBG-CS-REF-001 Code of Conduct Additional Supporting Information](#) (available from the TBG intranet, TBG Managers and Supervisors, or the TBG Corporate Services Manager). **Ignorance to seek additional information and assistance is not a defence for breach of the Code of Conduct.**

Violation of the Code of Conduct

A contravention of the Code of Conduct Principles is considered misconduct (which may amount to serious misconduct). Such behaviour can threaten the wellbeing of TBG, other employees and our customers. Misconduct will be dealt with in accordance with [TBG-CS-PRO-004 Discipline](#) and can lead to application of the [TBG-CS-PRO-005 Termination](#) Procedures.

No Director, Officer or Manager is to direct, approve or condone anything that violates the Code of Conduct Principles. Any Director, Officer or Manager who fails to promptly report and deal with any claim of violation will be subject to disciplinary action. If the situation includes the violation of a law, the matter may also be referred to the appropriate law enforcement agency.

TBG personnel and representatives must report any breach, or suspicions of a breach of the Code of Conduct Principles. This includes behaviour that makes TBG personnel and associated persons feel threatened or under pressure to engage in conduct contrary to the Code of Conduct Principles.

Intentionally making false allegations, as well as providing false or misleading information, will be treated seriously.

Making a report

Suspected Code of Conduct breaches should be raised promptly and directly to:

- An **immediate (direct) Manager or Supervisor**; or
- the **Executive Manager - Corporate** on **02 9646 6000** or compliance@tuttbryant.com.au; or
- the **Chief Financial Officer** on **02 9646 6000** or
- in the event where the above are implicated in a report, then direct contact should be made to the **Managing Director**.

Where appropriate, the matter may be escalated to the Company's legal consultant, Managing Director, Tat Hong Group CEO or CFO.

Matters that are considered grievances or complaints may be addressed in accordance with [TBG-CS-PRO-003 Resolve Grievances](#).

COMPLIANCE & REVIEW

Performance review and reporting, in addition to Management review and auditing determine compliance to this standard in accordance with [TBG-BPO-STD-005 Management Review and Auditing](#).

To ensure this policy is followed correctly, Compliance and/or Internal Audit may conduct unannounced audits. These audits may include the review of transaction files and financial records, and random interviews with personnel. Full cooperation with audits is required of all TBG personnel and representatives.

This Standard is subject to regular review by TBG.

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