

# CODE OF CONDUCT

**Jan 2023 – Dec 2023**

## About the Code

Pickwick Group Pty Ltd as trustee for The Pickwick Cleaning Services Unit Trust (ABN 74 089 708 818) and its subsidiary and associated companies hereafter referred to as “**Pickwick**” share common values and have common rules. These values and rules are about the way we behave at work, regardless of our position with Pickwick. They are defined in our Code of Conduct which explains our individual responsibilities as an employee or worker for Pickwick. The provisions of this Code are mandatory, and full compliance (to the extent the Code is applicable) is expected under all circumstances. A breach of this Code may result in disciplinary action up to and including termination of employment or contract.

These guidelines exist to ensure that we:

- Treat all workers, customers and members of the public with respect and dignity
- Maintain a safe and healthy workplace
- Comply with the law
- Act in the best interests of Pickwick
- Conduct business in an ethical and professional manner

To achieve these objectives, all nominated employees and workers must:

- Read the Code of Conduct
- Agree to the guidelines in the Code of Conduct
- Follow the guidelines in the Code of Conduct

It can sometimes be difficult to apply necessary principles to a specific situation. There are some basic questions employees and workers should ask themselves before they commit to a decision or action. These questions, when honestly answered, can help guide you through the most difficult situations:

1. Is it legal?
  - Will the decision or action violate any law or regulation?
  - Could I defend my decision / action in a court of law?
2. Is it consistent with the Code?
  - Do I know what the Code requires?
  - Have I assessed the risks and effects of the decision or action?
  - Should I seek guidance from my manager, the Head of People & Culture or Chief Executive Officer (CEO)?
3. Is it the proper action to take?
  - How would I feel if my decision or action was published in a newspaper?
  - Would I feel good if my family knew about my decision or action?

You are encouraged to discuss unclear or borderline situations with your manager, the Head of People & Culture or the CEO if the need arises to determine what is the proper course of action.

This Code must be read in conjunction with Pickwick’s policies which are published on our Intranet and ELMO HRIS system.

Controlled Document		Page 1 of 8	
Doc. Title: 8.1.1.22 Code of Conduct	Status: Approved	Issue Date:	22 February 2023
Revision: 10	Approved By: CEO	Printed:	

Current Pickwick's policies are:

- Bullying, Sexual Harassment and Discrimination Policy
- Corporate and Social Responsibility Policy
- Domestic Violence Support Policy
- Drug and Alcohol Management Policy
- Electronic Communications Policy
- Environmental Policy
- Equal Employment Opportunity Policy
- Ethical Sourcing Policy
- Fatigue Management Policy
- Food Safety Policy
- Indigenous Policy
- Modern Slavery Policy
- Privacy Policy
- Quality Assurance Policy
- Rehabilitation Policy
- Security and Theft Policy
- Security Providers Policy
- Staff Welfare Policy
- Training Policy
- Whistleblower Policy
- Work Health and Safety Policy
- Young Workers Policy

By signing the Acknowledgement Form you are acknowledging you have also read or re-read Pickwick's policies.

If you have any questions or you are unsure about any aspect of the Code of Conduct, please contact your manager.

### Pickwick Values

<i>Respect</i>	We genuinely acknowledge and respect each other's individual values, beliefs, efforts and ideas
<i>Accountability</i>	We acknowledge and assume responsibility for our own actions and personal behaviour and we are entitled to expect the same of others
<i>Integrity</i>	We maintain high standards of integrity and are conscientious in our approach to work

### Roles & Responsibilities

Employees, contractors and consultants are responsible for the following:

- Acting honestly
- Performing the duties of your role to the standards required by Pickwick and to the best of your ability
- Upholding the principles of equal employment opportunity and maintain a work environment free from discrimination, harassment, workplace bullying and victimisation (in accordance with the Bullying, Sexual Harassment and Discrimination policy)
- Your own behaviour and actions always
- Being aware of and complying with this Code of Conduct, other Pickwick policies, procedures and relevant legislation
- Treating other Pickwick employees, contractors and consultants fairly and with respect
- Acting in the best interests of Pickwick always
- Promptly informing their manager if they believe that the Code of Conduct has not been followed

Controlled Document		Page 2 of 8	
Doc. Title: 8.1.1.22 Code of Conduct	Status: Approved	Issue Date:	22 February 2023
Revision: 10	Approved By: CEO	Printed:	

- Taking all reasonable steps to secure Pickwick or Client premises and property
- Seeking advice from your Manager before undertaking an action or activity that may be contrary to Pickwick policies.

Managers are responsible for:

- Providing constructive feedback if there are emerging concerns about employees, contractors and consultants adhering to the Code of Conduct
- Ensuring that their team are aware of and comply with Pickwick policies and procedures
- Upholding and promoting the Code of Conduct and providing their team with a positive role model
- Ensuring that all workplace processes and practices comply with relevant policies, procedures and legislation
- Taking reasonable steps to prevent their team from engaging in conduct contrary to this Code of Conduct, as well as protecting them from such conduct
- Ensuring that their team are familiar with internal avenues for resolving complaints
- Dealing with complaints about unacceptable behaviour and misconduct quickly, effectively and confidentially
- Being open, honest, and transparent.

## How We Treat Each Other

Pickwick recognises that people are the most important feature of a successful business and is committed to building and maintaining a workplace where people are treated with the respect and dignity they deserve. To achieve this, all workers must refrain from any form of unacceptable behaviour.

Pickwick aims to ensure that all employment and business decisions are based on merit and any business decisions must be free from discrimination.

You are encouraged to raise any genuine concerns or complaints relating to how you or another person has been or is being treated to your manager or another senior manager if applicable.

For further information please refer to Bullying, Sexual Harassment and Discrimination Policy.

## Maintaining a Safe and Healthy Workplace

Pickwick is committed to providing anyone that enters a Pickwick workplace with a healthy, safe and clean working environment.

All workers commit to:

- Continuously monitor their safety and the safety of others
- Immediately stop any job or task that they believe is unsafe
- Address and report any hazards when they become aware of them
- Adhere to Pickwick's WHS policies and procedures
- Not use equipment or chemicals that they are not trained to use
- Always wear the personal protective equipment (PPE) required for the task
- Report all incidents and injuries immediately to the appropriate supervisor or manager
- Not be under the influence of drugs or alcohol at work
- Only smoke in designated smoking areas

Failure to abide by this commitment, whether it results in someone being injured or not, is considered a serious matter and will be dealt with appropriately.

Controlled Document		Page 3 of 8	
Doc. Title: 8.1.1.22 Code of Conduct	Status: Approved	Issue Date:	22 February 2023
Revision: 10	Approved By: CEO	Printed:	

For further information please refer to the following documents:

- Work Health and Safety Policy
- Drugs and Alcohol Management Policy
- Tobacco and Other Smoking Products Act 1998

## **Complying with the Law**

Relevant laws and regulations apply to everyone, such as those concerning discrimination or bullying in the workplace, workplace health and safety and criminal laws such as those concerning fraud, theft or assault.

Other laws apply to employees and contractors' roles such as trade practices laws for those in marketing or sales roles.

It is the responsibility of all those that work for Pickwick to comply with the laws that are relevant to their role. Any suspected breach of the law must be reported to the appropriate manager or another senior manager if applicable.

## **Conflicts of Interest**

Pickwick workers must avoid all situations in which their personal interests' conflict or might conflict with their obligations to Pickwick. If an actual, potential or perceived conflict of interest does arise it must be disclosed to Pickwick management.

A conflict of interest can arise when there is a personal, family or associated commercial interest which may interfere, or appear to interfere with the interests of Pickwick.

Conflicts of interest may include but not limited to:

- Having a personal financial interest in a competitor, supplier or customer of Pickwick
- Receiving benefits such as cash or gifts in connection with any services or business of Pickwick, which in the circumstances creates or could be interpreted as creating an obligation that affects the individual's objectivity in making a business decision
- Taking advantage of Pickwick's property or confidential information or other opportunities arising from the employee or worker's position to gain a personal benefit
- Conflicts arising from outside employment including involvement in community or professional organisations
- Solicitation of clients to another business

## **Company / Client Property and Intellectual Property**

Protecting and caring for the property of Pickwick and its clients is a responsibility shared by all workers.

Workers can meet this responsibility by:

- Always using property for its intended purpose
- Reporting any damage, loss, unauthorised removal or theft of property immediately to your manager
- Maintaining and cleaning Pickwick property as reasonably required

Intellectual Property (IP) is a collection of intangible legal rights and allows the IP owner to do certain things to the exclusion of others. IP rights include confidential information, business and domain names.

Pickwick owns the IP rights to anything you create or develop during your employment or engagement with Pickwick (for example, a report, web pages, software, a product, service, process

Controlled Document		Page 4 of 8	
Doc. Title: 8.1.1.22 Code of Conduct	Status: Approved	Issue Date:	22 February 2023
Revision: 10	Approved By: CEO	Printed:	

or concept, etc). Pickwick is entitled to the exclusive benefit of the works created by you and may request that you waive your moral rights to those works.

You must not engage in the unauthorised use of a third party's intellectual property. This obligation continues after your employment with Pickwick ends.

### **Company Computers, Laptops, Phones and Tablets**

Pickwick may provide communication devices for business use including computers, laptops, tablets and mobile phones. The use of these devices is prohibited for the following purposes:

- Sending or receiving pirated software, videos or images
- Unauthorised sending or receiving confidential information including but not limited to trade secrets, financial records, personnel records, business plans and client records
- Using communication devices to view illegal, pornographic or any other inappropriate content
- Sending or intentionally receiving material which may be considered offensive, obscene, defamatory or inappropriate to others
- Using online gambling services
- Personal use that is excessive and has a negative impact on Pickwick or interferes with job performance
- Downloading media for private use that has a negative impact on Pickwick's network and internet connection

Any unauthorised, unlawful or unreasonable personal use of electronic equipment will result in disciplinary action.

For further information please refer to the Electronic Communications Policy.

### **Social Media**

Pickwick respects the right of its employees and workers to use social media outside of work. However, it is important to realise the same rules that apply to the use of internal communications during work time also apply outside of work if there is a connection between the communication and those that have a relationship with Pickwick. It is important we respect one another's privacy and are aware that false or defamatory comments or the publication of an individual's private details could result in legal liability for Pickwick and you.

The following rules apply to the use of social media either during or outside of work:

- Communication through social media concerning Pickwick, its employees and contractors and its clients and customers must not violate this Code, especially as the Code relates to defamation, bullying and harassment, vilification and discrimination at the workplace
- Social media is not the appropriate place to make a grievance regarding Pickwick, its employees and contractors, its clients and customers or its management
- You must never use social media to disclose Pickwick's confidential information or attempt to speak on behalf of Pickwick including displaying any Pickwick name or logo
- Information published on social media regarding Pickwick cannot be attributed to Pickwick without the approval of the CEO

For further information please refer to the Electronic Communications Policy.

### **Action with Authority**

A Delegation of Authority represents a significant responsibility for those people who hold them. Delegates must exercise care and diligence when carrying out their delegations of authority.

Controlled Document		Page 5 of 8	
Doc. Title: 8.1.1.22 Code of Conduct	Status: Approved	Issue Date:	22 February 2023
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All employees and other workers where applicable must ensure they are aware of the delegations and limits. Further to this all employees and workers are only empowered to make decisions that put the interests of Pickwick first and foremost and will have accountability for their decisions.

For further information please refer to the Delegations of Authority Manual.

### **Confidential Information**

Pickwick and its workers may be entrusted with documents and information (paper and electronic) of a confidential nature. Workers must not share confidential information without proper authorisation.

Confidential information includes but is not limited to:

- Pickwick financial records, reports, budgets, pricing
- Details about Pickwick's strategy, operations, processes
- Personnel records
- Details of wages and salaries
- Customer and supplier records including contracts and other arrangements
- Pickwick software and electronic communication being used

Workers who have access to such information must ensure that:

- Information is only used for its intended purpose
- Information is only shared on a need to know basis
- Information is stored, received and communicated in the appropriate manner
- Usernames and passwords are not shared with other persons

### **Ethical Business Conduct**

Pickwick has zero tolerance to fraud, theft and corruption. Incidents of such misconduct must be reported to the appropriate manager or to the CEO. Some examples of fraud, theft or corruption include:

- Theft of cash or Pickwick's property by workers
- Theft of cash or Pickwick's client's property by workers
- False or misleading timesheets
- False or misleading expense claims
- False invoicing
- False accounting
- Using a position within Pickwick for personal gain
- Offering bribes or inducements to business or government officials

For further information refer to the Security and Theft Policy.

### **Gifts and Entertainment**

From time to time Pickwick workers may accept or provide gifts and entertainment where the value is reasonable considering the nature of the business that they are undertaking.

All gifts and entertainment offered with a value of more than \$50 must be disclosed to your manager who will then decide whether it is appropriate to keep the gift or not.

No gifts or entertainment of any description even if considered inexpensive or insignificant may be given to any government official whatsoever without the express authorisation of the CEO.

Controlled Document		Page 6 of 8	
Doc. Title: 8.1.1.22 Code of Conduct	Status: Approved	Issue Date:	22 February 2023
Revision: 10	Approved By: CEO	Printed:	

## **Suspected Breaches of the Code**

If you know or in good faith suspect that a material violation of the law or this Code has occurred or is at risk of occurring, it is your responsibility to immediately report the suspected violation to your manager or another senior manager if applicable. In all instances, reported matters will be treated confidentially to the extent that it is possible in conducting a proper investigation. Pickwick will not tolerate any retaliation against a person who has raised a question or concern in good faith about the violation of this Code, the law or any of Pickwick's policies or procedures.

If you are not satisfied with the response or action taken by the managers who you reported the suspected breach to, you must escalate your complaint, question or concern to the CEO.

## **More Information**

If you have any questions or concerns about the contents of this Code, please contact Pickwick's Head of People & Culture or CEO.

***Greg Luck***

Greg Luck  
Chief Executive Officer  
Pickwick Group Pty Ltd  
Date: February 2023  
Review Date: February 2024

Controlled Document		Page 7 of 8	
Doc. Title: 8.1.1.22 Code of Conduct	Status: Approved	Issue Date:	22 February 2023
Revision: 10	Approved By: CEO	Printed:	

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### Worker Acknowledgment and Declaration Form

By signing below, I declare and acknowledge that I have received and kept a copy of Pickwick's most recent Code of Conduct for future reference. I also declare and acknowledge I have read it along with Pickwick's policies posted on its website. I agree to disclose any transactions or matters of potential conflict to Pickwick's Head of People & Culture or CEO in writing. Any transaction or other potential conflicts not previously reported are listed and attached to this Acknowledgement Form. I understand that Pickwick's electronic communications systems are to be used for conducting the business of Pickwick and are subject to inspection without notice at Pickwick's discretion.

Note: Do not sign unless you fully understand it.

\_\_\_\_\_  
Worker's Name (please print)

\_\_\_\_\_  
Position Title

\_\_\_\_\_  
Worker's Signature

\_\_\_\_\_  
Date

\_\_\_\_\_  
Manager's Name (please print)

\_\_\_\_\_  
Position Title

\_\_\_\_\_  
Manager's Signature

\_\_\_\_\_  
Date