



## Group Code of Conduct

Verified by: Peter Tazewell	Document Name	Version	Date	Review Date
	Group Code of Conduct	1	June 2015	June 2016

## 1 Introduction

The Group is committed to being a responsible corporate citizen. The Group interprets its responsibilities as not only requiring it to abide by the laws respectively binding upon each of its Group entities, but also requiring it to conduct its business in accordance with the ethical principles and practices set out in this Code.

The Board charges management with and requires that the Code extends to the Group as a whole, including the Board and the Group's executives and personnel generally so as to create a culture within the Group that promotes ethical and responsible behaviour.

## 2 Corporate and Business Integrity

### 2.1 Honesty, integrity and fairness

The Group recognises the importance of conducting its operations in a manner consistent with the principles of honesty, integrity and fairness.

### 2.2 Legal and regulatory compliance

Compliance with all relevant laws and regulations binding upon the relevant Group entity is expected.

### 2.3 Transparent accountability

The Group recognises the attributes of transparent accountability in the management of the Group's affairs, subject to prudential confidentiality and commerciality constraints.

### 2.4 Political Involvement

The Group will not participate in party politics. This does not restrict the Group appropriately advocating or supporting policies relevant to the Group's best interests, which policies may have political implications.

### 2.5 Bribes and Corruption

Corrupt practices are not acceptable, irrespective of local standards or practices in the place of business. The Group and its personnel must not, directly or indirectly offer, pay, solicit or accept bribes or participate in any corrupt arrangements or payments, and must promptly notify the Group's designated officer (if any) for probity matters (or in the absence of a designated officer, the CEO or Chair) should any information concerning such practices come to their attention.

### 2.6 Competition

The Group supports the principles of free and fair competition in the market in compliance with applicable competition and consumer protection laws.

## 2.7 Privacy and Information

The laws in relation to privacy, and the use of confidential or sensitive information, will be respected by the Group.

## 2.8 Conflicts of Interest

Conflicts of interest are to be avoided.

Where a conflict of interest does arise, full disclosure must be made to the person's supervising officer (or otherwise as provided in the Company's Corporate Governance Charter) and all relevant persons must not participate in any related decision-making processes.

## 2.9 Whistleblowing

The Group is committed to fostering an environment where concerns about illegal or unethical behaviour which affect the Group can be reported in the confidence and without fear of retribution. The Group will treat reports of this kind to the designated officer (if any) for such purpose (or in the absence of a designated officer, the Company Secretary or the CEO) with the seriousness they deserve and investigate and act on them appropriately and promptly.

# 3 Labour

## 3.1 Discrimination

The Group recognises the dignity of each worker, and the right to a workplace free of harassment, abuse and unfair punishment. Decisions on hiring, salary, benefits, advancement, termination or retirement will be based on the best interests of the Group and the person's ability to fulfil the relevant requirements of the position. There must be no discrimination based on race, creed, gender, marital or maternity status, religious or political beliefs, age or sexual orientation.

## 3.2 Forced Labour

The Group must not use forced labour in any form.

## 3.3 Child Labour

The Group recognises the rights of every child to be protected from economic exploitation and from performing any work that is likely to be hazardous or to interfere with the child's education, or to be harmful to the child's health or physical, mental, spiritual, moral or social development.

## 3.4 Compensation

The Group will provide each worker with at least the minimum prevailing legislated wage.

## 3.5 Benefits

The Group must provide each worker with all benefits legally required.

### 3.6 Hours of Work/Overtime

The Group will comply with legally mandated work hours, and compensate for overtime (as appropriate).

### 3.7 Freedom of Association

The Group recognises the right of workers to form and join trade unions and to bargain collectively.

### 3.8 Diversity

The Group respects and values the benefit of diversity (including skills, experience, perspective, gender, culture, age and otherwise) to enrich the Group and to enhance the probability of achievement of the Group's objectives.

## 4 Health & Safety

The Group aspires to providing a safe and healthy working environment at all times, in accordance with accepted sound practices for occupational health and safety, including having regard to prevailing knowledge of the industry and of any known and probable specific hazards.

## 5 Environment

The Group and its personnel must comply with all applicable environmental laws and regulations.

## 6 Community

The Group will strive to be a respected corporate citizen and to operate in a manner which encourages a lasting, beneficial and constructive relationship with the communities in which it operates.

## 7 Contractors

The Group expects its principal contractors and suppliers to observe comparable standards to those set out in this Code of Conduct in their dealings with the Group.

## 8 Compliance

The Group should ensure the availability, communication and training of this Code of Conduct throughout the Group, its personnel and its principal contractors and suppliers.

The Group should oversee and monitor compliance with this Code of Conduct and implement proportionate disciplinary action if it is breached.

The Group should maintain sufficient records and evidence to demonstrate its activities to ensure compliance with this Code of Conduct. This may include internal and external audits in relation to compliance with this Code by the Group and its personnel.

## 9 Relationship with Matrix Group Core Values

The Matrix Group has developed a set of 'core values' being People, Continuous Improvement, Teamwork, Innovation, Customer Focus, Integrity and Safety. These core values are acknowledged and are consistent with the values established by the Board in this Code of Conduct.