



# BUSINESS CODE OF CONDUCT POLICY

OPTIMISING PRODUCTIVITY



**LINKFORCE**  
ENGINEERING



# BUSINESS CODE OF CONDUCT POLICY

## 1 INTRODUCTION

### 1.1 Purpose

The purpose of this Code of Conduct is to set a standard of behaviour throughout the business which will guide how we behave when carrying out our work, how we make decisions, measure our performance against those standards and are accountable for those decisions.

Linkforce Engineering has a strong commitment to integrity, honesty and fairness where decisions are based on what is right and ethical and comply with Linkforce Engineering governance, policies, procedures and processes and all applicable laws and regulations.

Where this code contains higher standards than laws and regulations then the higher standards of this code shall apply.

### 1.2 Scope

This Policy applies to all Linkforce Engineering Directors, Executives, Managers, Employees and Contractors whose contracts or terms of engagement either explicitly or implicitly requires compliance.

### 1.3 About the Code

The Business Code of Conduct provides a framework and principles that apply throughout all aspects of our working environment and how we conduct our day to day business. It includes how we do business with clients, contractors, sub-contractors and suppliers, how we interact with colleagues and the employees of clients, contractors, sub-contractors and suppliers.

It is not intended to cover all possible circumstances that may arise on a day to day basis nor is it intended as an exhaustive list of do's and don'ts. It is intended to guide us in making right decisions and acting in the right manner. In any grey areas it is important to ask ourselves the following questions:

- Does the decision or action comply with Linkforce Engineering's values?
- Is it honest, fair and ethical?
- Would it maintain and or enhance Linkforce's Engineering's reputation?
- Does your instinct tell you it is right?

If the answer to any of the questions is 'No' then it is best that you seek advice from a colleague or your Line Manager and refer to the Business Code of Conduct for guidance.

This Business Code of Conduct is reviewed and improved on an ongoing basis to take account of new laws and regulations, new policies and procedures and improved best practices. It is a core part of induction and ongoing training.

## 2 REPORTING AND CONSEQUENCES FOR BREACH OF THE CODE

### 2.1 Reporting

Linkforce Engineering encourages all Personnel having any concerns under this Business Code of Conduct to raise any matter, whether it is to report actions or behaviour which may breach the Code, to seek consent to any action where such consent is required or to seek advice.

The matter should initially be raised with your immediate Line Manager or if, in the circumstances, this is inappropriate, with that Line Managers, Manager or a member Executive Management Team.



# BUSINESS CODE OF CONDUCT POLICY

Where it is not an issue to be determined by the Line Manager that Line Manager shall refer it to the Executive Management Team who shall decide what action to take. Any investigation ordered shall be carried out by someone appointed by the Executive Management Team to carry out that investigation and such investigation shall be carried out in accordance with procedures laid down in the Misconduct and Disciplinary Policy & Procedure.

At all times confidentiality shall be maintained and, if requested, where a concern is being raised or a matter being reported, the identity of the person raising the matter shall remain anonymous.

Any Personnel raising a concern or reporting a matter will not be victimised and will be fully protected against victimisation.

## 2.2 Consequences

Linkforce Engineering takes its commitment to the principles and framework of the Business Code of Conduct very seriously and breaches of the Code may lead to disciplinary action and depending on the seriousness or otherwise of the breach could result in any penalty up to summary dismissal in accordance with the Misconduct and Disciplinary Policy & Procedure. In addition, if the actions constitute a breach of laws they may be held personally liable for their actions. Breaches by clients, contractors, sub-contractors or suppliers could result in termination of their contracts.

- [Misconduct and Disciplinary Policy & Procedure](#)
- [Whistle-blower Policy](#)

## 3 PEOPLE SAFETY AND ENVIRONMENT

### 3.1 Health and Safety

Linkforce Engineering considers sustainable Health and Safety of its Personnel and those of its clients, contractors, sub-contractors and suppliers of fundamental importance to its business. Through continuous improvement, positive culture and strong core values we aim for zero harm.

No topic is more important to us. We meet all legal requirements as a minimum and through our AS/NZS 4801:2001 accreditation strive to achieve industry best practice at all times and in everything we do.

Linkforce Engineering is committed to providing safe workplaces by:

- Committed and active leadership
- Continually improving HSEQ Management System and reviewing measurable objectives and targets in compliance with AS/NZS 4801:2001.
- Complying with all legislative, regulatory and internal requirements.
- Effective and robust health and safety management systems focused on identifying and controlling risks and hazards.
- Continuous training and development of our employees together with consultation and communication to enable them to perform their work safely.
- Defining clear roles and responsibilities for all employees including health and safety accountabilities.

Linkforce Engineering never:

- Prioritise other goals above health and safety matters.



# BUSINESS CODE OF CONDUCT POLICY

- Ignore unsafe practices
- Ignore health and safety rules
- Undertake work unless we are fit, competent and fully trained

## 3.2 The Environment

Linkforce Engineering considers that an essential component to long term success and sustainability is work practices and business activities that respect the environment and community. Linkforce Engineering is committed to minimising the environmental footprint of the business and achieving and maintaining its goal of zero harm to the environment.

Linkforce Engineering is committed to achieving its goals by:

- Promoting a culture through education, processes and procedures towards environmental protection
- Complying with all legislation, regulations and client standards
- Using resources that promote efficiency, recycling materials and disposal of waste in the most environmentally friendly and industry best practice manner
- Conduct regular reviews of our Environmental Management System to ensure compliance with ISO 14001:2004 standards and to continually improve our system

Linkforce Engineering never:

- Ignores the impact of our work or business activities on the environment
- Fails to report and deal with environmental incidents

## 3.3 Harassment and Bullying

Linkforce Engineering is committed to creating and maintaining a workplace environment which fosters mutual respect, integrity and professional conduct. Bullying and harassment consists of unwanted conduct, comments, actions or gestures that affect a person's dignity, psychological or physical health and well-being. These behaviours impact a person's health and safety and impact the company through reduced productivity and loss of skilled staff.

Linkforce Engineering is committed to eliminating bullying and harassment in the workplace by:

- Treating complaints of bullying and harassment in a fair, timely, confidential, professional impartial and consistently applied manner while preserving the dignity, self-respect and rights of all individuals.
- Addressing bullying and harassment behaviour as soon as possible.
- Training and educating and introducing prevention-oriented practices.
- Strictly enforcing the Anti-Bullying and Harassment Policy.

Linkforce Engineering never:

- Tolerate bullying and harassment in any form or under any circumstances.
- Tolerate physical or verbal violence or threats.
- Ignore complaints of bullying.



# BUSINESS CODE OF CONDUCT POLICY

## 3.4 Discrimination and Diversity

Linkforce Engineering recognises that a talented and diverse workforce is a key competitive advantage and our success is a reflection of the quality and skills of our Personnel. One of our key leadership goals is to develop a workforce climate that promotes diversity. Our policy is to recruit on the basis of competence and performance. We are committed to recruiting, developing and retaining the best of talent regardless of gender, age, nationality, race religious beliefs, sexuality, physical ability or cultural background.

Linkforce Engineering is committed to diversity in the workplace by:

- Setting diversity goals and reviewing on an annual basis
- Promoting diversity, providing diversity education and monitoring recruitment, promotions and turnover
- Taking action to stop and prevent discrimination in all its forms

Linkforce Engineering never:

- Tolerate any form of discrimination
- Make decisions based on attributes unrelated to competency and job performance

## 3.5 Personal Information, Privacy and Information Security

Linkforce Engineering receives and retains information on individuals and companies in the course of and for the purposes of carrying on its business. This information may be sensitive and or personal information. Linkforce Engineering only collects this information for legitimate business purposes and in doing so complies with all laws processes and procedures including full, accurate and transparent disclosure as to why data is being collected, how incorrect information can be corrected and full disclosure where information security is breached.

Linkforce Engineering is committed to protecting privacy and information security by:

- Only collecting such information that is needed for legitimate business purposes.
- Providing full disclosure of why data is being collected and how data can be accessed and corrected
- Provide a complaints procedure where there is an allegation of breach of privacy
- Set up and continually review an Information Security Management System
- Use best practice to protect information and data and continually review and update security systems
- React appropriately and quickly to any suspected breach of information security

Linkforce Engineering never:

- Collects unnecessary personal information
- Shares personal information other than in accordance with laws and its policies and procedures
- Permits or allows information or data to be accessed other than for legitimate purposes
- [Health and Safety Policy](#)
- [Fitness for Work Policy](#)
- [Anti-Bullying – Harassment Policy](#)
- [Diversity Policy](#)
- [Privacy Policy](#)



# BUSINESS CODE OF CONDUCT POLICY

- [Information Security Policy](#)
- [Information Security Incident Management Policy](#)
- [HR Code of Conduct](#)
- [Environmental Management Policy](#)

## 4 ETHICAL BUSINESS PRACTICES

### 4.1 Bribery and Corruption

Linkforce Engineering does not permit, condone or participate in any sort of bribery or corruption and conducts all of its business activities with integrity. Bribery is the offering, receiving or soliciting of something of value whether directly or through a third party for the purpose of improperly securing a private or business benefit or advantage or for the improper performance of an activity or function. Corruption is the abuse of the position of employment by dishonest or fraudulent conduct to gain an advantage. Breach of bribery and corruption laws also represent serious criminal offences.

Linkforce Engineering is committed to conducting its business ethically and with dignity, and do not participate in Bribery or Corruption by:

- Performing its business in a lawful and ethical manner
- Having a policy of zero tolerance to acts of bribery or corruption
- Prohibiting its Personnel from giving or accepting cash, loans, monetary rewards or benefits other than permitted as part of its entertainment policy
- Ensure all allegations of bribery or corruption are fully investigated and reported and appropriate actions taken where necessary

Linkforce Engineering never:

- Offers, promises or gives cash or cash equivalent payments of any sort to a government official or to any other person for the purpose of gaining an improper advantage
- Makes unapproved political donations or contributions
- Makes or receives facilitation payments

### 4.2 Gifts, Entertainment and Hospitality

Linkforce Engineering recognises that the giving and receiving of gifts, entertainment and hospitality in the course of business and when carried out as a legitimate part of maintaining and developing customer relations is permitted. These gifts, entertainment and hospitality shall be of modest value, comply with all laws and business practice and are not intended to be a reward for or to facilitate preferential treatment.

Linkforce Engineering is committed to conducting its business ethically by:

- Setting limits on the value of gifts, entertainment and hospitality that can be offered or accepted and reviewing on an annual basis.
- Ensuring that any gifts above an annually reviewed value shall be authorised by appropriate management levels depending on the value.
- Maintaining a register for all gifts and entertainment above certain annually reviewed values.



# BUSINESS CODE OF CONDUCT POLICY

Linkforce Engineering never:

- Permits the offering or acceptance of loans, cash or cash equivalents.
- Permits gifts, entertainment or hospitality in return for or on the understanding of business, services, information or preferential treatment or advantage.
- Offers or receives gifts, entertainment or hospitality of an inappropriate nature or location.

## 4.3 Conflicts of Interest

Linkforce Engineering is committed to ensuring conflicts of interest between personal and business interests which could affect the interests of Linkforce Engineering are avoided and where unavoidable ensuring that such conflicts are actively managed. A conflict of interest arises where an employee has a personal interest or a perceived personal interest in any activity, decision making process or business interest which could or could be perceived as affecting his judgement, objectivity, impartiality, independence and or could impact the interests of Linkforce Engineering.

Linkforce Engineering is committed to ensuring conflicts are avoided or managed by:

- Ensuring that Personnel shall seek approval before accepting any outside work, position or role that could compete with or conflict with the business.
- Reporting all conflicts or potential or perceived conflicts.
- Where conflicts exist removing that person from any decision making process.
- That all personal relationships that cause or may be perceived as causing a conflict are declared and reported.

Linkforce Engineering never:

- Permits the use of one's position for personal gain or that of a close friend or family member.

## 4.4 Anti-Competitive Conduct

Linkforce Engineering is committed to ensuring that it operates according to principles of free and fair open competition and in so doing complies with all applicable competition laws. Competition laws prohibit collusion or cartel conduct with competitors, including price fixing, agreeing output restrictions with competitors or collusive tendering. Linkforce Engineering also prohibits anti-competitive agreements, misuse of market power and unconscionable conduct. Breach of the competition laws can result in serious consequences both for Linkforce Engineering and Personnel involving significant financial and criminal penalties and potential significant reputational damage to Linkforce Engineering.

Linkforce Engineering is committed to operating fairly and competitively in its markets by;

- Cooperating fully with the competition authority.
- Ensuring Personnel fully understand the competition laws and their information is reviewed and updated regularly and as required.
- Ensuring that all subcontractor and supplier awards are made following competitive bids and only relevant evaluation criteria are considered.

Linkforce Engineering never;





# BUSINESS CODE OF CONDUCT POLICY

- Fixes prices with competitors or engage in collusive tendering.
- Uses our market power to bully, harass or coerce our business partners.
- Receives confidential information from a competitor's employee for the purpose of gaining a competitive advantage.
- Agreeing with a competitor to exclude certain subcontractors from a bid or tender process.
- [Anti-Bribery and Corruption Policy](#)
- [Entertainment Policy](#)
- [Tender Management Process](#)
- [Subcontractor Engagement Process](#)
- [HR Code of Conduct](#)

## 5 USE OF ASSETS AND RESOURCES

### 5.1 Protection of Assets

Linkforce Engineering requires that all its Personnel, subcontractors and suppliers shall protect the Assets of Linkforce Engineering and not use or allow them to be used for illegal purposes or for purposes unrelated to the business of Linkforce Engineering. The assets comprise funds, plant and equipment, supplies, computer and telephone networks and equipment, computer software systems, business management systems, intellectual property, confidential information and trade secrets together with information Personnel may have access to as part of their work responsibilities.

Linkforce Engineering is committed to protection and proper use of its assets by:

- Investigating any reports of theft or fraud and taking appropriate action.
- Ensuring that assets are not used by Personnel for personal or personal business gain.
- Encouraging reports of alleged theft or fraud under a best practice whistle-blower policy and ensuring there is no victimisation of those who report.
- Seeking to ensure that all third parties using Linkforce Engineering assets comply with Linkforce Engineering policies and procedures when dealing with Linkforce Engineering assets.
- Allowing Personnel reasonable use of information and communications technology.

Linkforce Engineering never:

- Makes assets or resources available to third parties other than for Linkforce Engineering business.
- Allows assets be used for personal or personal business gain.

### 5.2 Financial Controls and Reporting Accuracy

Linkforce Engineering maintains up to date best practice financial controls to ensure the accuracy, completeness and truthfulness of financial reports and that all information and records are maintained to properly and accurately reflect all transactions and events. Linkforce Engineering maintain controls and records for many purposes including audit and compliance, business planning and forecasting, payment and invoicing and minimising the risk of fraud or dishonesty.

Linkforce Engineering is committed to maintaining best accounting industry practices and controls by:





# BUSINESS CODE OF CONDUCT POLICY

- Continually reviewing and updating the financial controls and records and reporting procedures and processes.
- Fully cooperating with our accountants and auditors.
- Ensuring that any concerns about the reporting process or record-keeping is reported and investigated

Linkforce Engineering never:

- Permits or condones misrepresenting of financial transactions or the falsification of company records.
- Destroys or amends records that are required to be kept or are likely to be the subject of litigation or regulatory investigation
- [HR Code of Conduct](#)
- [Use of IS, Email and Mobile Phone Policy](#)