

Code of Conduct Policy

This policy affirms Muir Engineering Group's belief in responsible social and ethical behaviour from all employees. This policy clarifies the standards of behaviour that Muir Engineering Group expects of all employees.

Our employees contribute to the success of our organisation and that of our Clients. Muir Engineering Group fully endorse that all employees are not deprived of their basic human rights.

Furthermore, our employees have an obligation to the Business, our Clients and themselves to observe high standards of integrity and fair dealing. Unlawful and unethical business practices undermine employee and Client trust.

Policy

Our Code of Conduct policy applies to all employees and provides the framework of principles for conducting business, dealing with other employees, Clients and suppliers. The Code of Conduct does not replace legislation and if any part of it is in conflict, then legislation takes precedence. This policy is based on the following:

- Act and maintain a high standard of integrity and professionalism
- Be responsible and scrupulous in the proper use of Company information, funds, equipment and facilities
- Be considerate and respectful of the environment and others
- Exercise fairness, equality, courtesy, consideration and sensitivity in dealing with other employees, clients and suppliers
- Avoid apparent conflict of interests, promptly disclosing to a Muir Engineering Group senior manager, any interest which may constitute a conflict of interest
- Promote the interests of Muir Engineering Group
- Perform duties with skill, honesty, care and diligence
- Abide by policies, procedures and lawful directions that relate to your employment with Muir Engineering Group and/or our Clients
- Avoid the perception that any business transaction may be influenced by offering or accepting gifts
- Under no circumstances may employees offer or accept money
- Any employee, who in good faith, raises a complaint or discloses an alleged breach of the Code, whilst following correct reporting procedures, will not be disadvantaged or prejudiced. All reports will be dealt with in a timely and confidential manner.

Muir Engineering Group expects co-operation from all employees in conducting themselves in a professional, ethical and socially acceptable manner of the highest standards.

Any employee in breach of this policy may be subject to disciplinary action, including termination.

Should an employee have doubts about any aspect of the Code of Conduct, they must seek clarification from the CEO.

This policy will be regularly reviewed by Muir Engineering Group and any necessary changes will be implemented by the CEO.

Anti-briber Convention

Australia implemented the OECD Anti-Bribery Convention in 1999 by enacting anti-bribery and anti-corruption provisions in the Criminal Code.

Under the Criminal Code, it is an offence to directly or indirectly provide or offer someone a benefit that is not legitimately due to that person, with the intention of influencing a foreign public official in the exercise of their duties, in order to obtain or retain business or a business advantage. The maximum penalties under the Criminal Code for foreign bribery offences mirror the domestic bribery offences for bribery of a Commonwealth public official. A 2015 amendment to the foreign bribery provision clarifies that intention to bribe a particular foreign official is not necessary to establish an offence.

In this context, 'foreign public official' includes any employee, contractor or official of a foreign government department or agency, a foreign controlled company or a public international organisation; members of a foreign military or police force; or members of the executive, judiciary or magistracy of a foreign country.

Procedure

An employee who receives a bribe will likely also contravene the Corporations Act 2001 (Cth), and in doing so face a pecuniary penalty of up to A\$200,000, a disqualification order or a compensation order.

So the laws that govern this are: Criminal Code Act 1995 & Corporations Act 2001 (Cth)

Grievance complaints

Muir Engineering Group supports the right of every employee to lodge a grievance with their manager if they believe a decision, behaviour or action affecting their employment is unfair. An employee may raise a grievance about any performance improvement action taken against them.

We aim to resolve problems and grievances promptly and as close to the source as possible. When necessary, Muir Engineering Group will escalate a grievance to the next higher level of authority for more discussion and resolution, and continue escalating it to the level above until it is resolved.

Managers will do their utmost to action grievances objectively, discreetly and promptly. Be aware that grievances that are misconceived, vexatious, and lacking substance may result in disciplinary action being taken against the employee lodging the grievance.

Procedure

1. The employee should try to resolve the grievance as close to the source as possible. This can be informal and verbal. At this stage, every possible effort should be made to settle a grievance before the formal grievance process starts. If the matter still can't be resolved, the process continues and becomes formal.
2. To start the formal grievance the complaints must fully describe their grievance in writing, with dates and locations wherever possible and how they have already tried to settle the grievance.
3. The person(s) against whom the grievance/complaint is made should be given the full details of the allegation(s) against them. They should have the opportunity and a reasonable time to respond before the process continues.
4. If the grievance still can't be resolved, refer the matter to the most senior manager for consideration and a final decision. A grievance taken to this level must be in writing from the employee.

Gross or serious misconduct policy.

Summary (instant) dismissal for gross or very serious misconduct is possible (depending on the facts involved). Management should seek advice before taking this step.

Procedure

1. The manager is to investigate the alleged offence thoroughly, including talking to witnesses, if any.
2. The manager should ask the employee for their response to the allegation (taking notes of this discussion) and allow them to have representation. The manager should also have a witness present. The manager shall give genuine consideration to the employee's response and circumstances.
3. If still appropriate, following a thorough investigation, the manager can terminate/dismiss the employee.
4. The manager should keep a file of all evidence collected and action taken in these circumstances.
5. Muir Engineering Group will send the employee a letter of termination noting brief details.