



## CODE OF CONDUCT POLICY (OHS-POL-003)

### INTRODUCTION

This code of conduct applies to all employees and sub-contractors of Indianic Group Pty Ltd and its subsidiaries ("Indianic").

### POLICY OBJECTIVES

To provide a clear framework regarding Indianic employees conduct in business, liaising with clients, colleagues and stakeholders by:

- Acting with integrity and professionalism;
- Ensuring proper use of Indianic equipment and information; and
- Maintaining courtesy, equality and consideration when liaising with clients, colleagues and stakeholders;
- Avoid conflicts of interest;
- Define the roles and responsibilities of Indianic personnel; and
- To educate and promote personnel in regards to their responsibilities in the workplace.

### ROLES AND RESPONSIBILITIES

#### Indianic Managers/Supervisors are required to:

- Implement this policy within their area of responsibility;
- Protect employees as far as practicable from hazards and bullying in the workplace;
- Be positive role models for all Indianic employees and encourage employees to be proactive and use their initiative;
- Act immediately (and have the authority) if they identify any Indianic personnel who are in breach of this policy; and
- Maintain confidentiality.

#### All Indianic Employees and Subcontractors are required to:

- Perform any duties associated with employees' position professionally, diligently, impartially and conscientiously to the best of their ability;
- Utilise their initiative and provide all necessary and appropriate assistance;
- Take direction from supervisors and managers;

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- Comply with Indianic procedures, policies, instructions and lawful directions as per this code of conduct and the spirit it was written in (if reasonable and legal) Comply with Indianic procedures, policies, instructions and lawful directions as per this code of conduct and the spirit it was written in (if reasonable and legal);
- Discuss with their manager/supervisor concerns regarding the workplace, another employee/subcontractor and/or any issues which may affect their work performance;
- Promote the interests of Indianic and conduct work in a manner which enhances Indianic's reputation;
- Utilise Indianic infrastructure and resources appropriately and when approved to do so;
- Abide by applicable laws, regulations and company/site policies;
- Maintain confidentiality with regards to Indianic information (do not disclose information unless approved to do so by management) and the privacy of individuals; and
- Shall NOT provide false or misleading information.

### DISCRIMINATION, VIOLENCE, AGGRESSION AND BULLYING

Indianic management view discrimination, violence, aggression and bullying as inappropriate behaviour in the workplace whether by an employer, employee, client and/or other source. All identified incidents and reports of such behaviour will be taken extremely seriously and investigated as per any other workplace hazard in accordance with the *Occupational Safety and Health Act 1984* and the *Western Australian Code of Practice Violence, Aggression and Bullying at Work 2010* and relevant legislation.

*Discrimination:* Incidents whereby an employer or employee takes adverse action against another colleague, employee or client because of the person's race, gender, colour, age, sexual preference, physical or mental disability, marital status, religion, pregnancy, political opinion, etc. Examples include intimidation, humiliation, harassment and threats.

*Violence and Aggression:* Incidents and/or actions which have the potential to cause physical and/or psychological harm to another person. Examples include threatening behaviour and physical attack.

*Bullying:* Inappropriate repetitive behaviour directed towards an individual or group of people which pose(s) a risk to the individual's physical and/or psychological health and safety. Examples include intimidation, humiliation, sexual harassment, threats (physical and psychological) and inappropriate comments etc.

Such inappropriate behaviour can quickly escalate and lead to serious consequences and therefore is not tolerated by Indianic. Depending on the situation ramifications of such behaviour may lead to warnings, counseling, demotion, dismissal and/or criminal charges.

All employees are encouraged to report such behaviour (**Note:** Victimisation against employees who report incidents will not be tolerated) to Human Resources Officer. **Note:** confidentiality will be maintained at all times.

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### **CONFLICT OF INTEREST**

Working for another organisation or conducting a business is not permitted without permission from the Operations Manager. All reasonable effort must be made to advise Indianic operations manager and administration at least two weeks prior to leaving a long term job and 48 hours for all other jobs.

Employees must avoid personal, financial or other interests which may conflict with their responsibilities to Indianic. Such conflicts must be disclosed to the operations manager immediately.

### **CONFIDENTIALITY**

Employees must not use or disclose any information obtained through their employment with Indianic, other than required to complete their duties/responsibilities (i.e. information shall not be used to gain financial reward or other benefit or to take advantage of Indianic or an individual).

### **COMPANY PROPERTY**

All Indianic property, funds, facilities and services shall be utilised for approved purposes only.

Indianic property and equipment shall not be removed from Indianic premises without permission.

Any intellectual property created by an Indianic employee shall remain the property of Indianic.

### **MEDIA RELEASES**

All media releases shall be conducted by the operations manager or as delegated.

### **COMPLIANCE**

Employees must be aware of and comply with Indianic policies, procedures, instructions (if reasonable and legal) and relevant legislation.

Indianic view any non-compliance with this policy (and any other company policy) as a serious breach.

### **BREACHES OF THE INDIANIC CODE OF CONDUCT**

Employees must comply with the code of conduct and immediately report any breaches (known or suspected) to their manager.

Employees who report breaches in good faith according the procedure below shall not be disadvantaged and all reports shall remain confidential.

An alleged breach should be in writing to the employee's immediate supervisor (or senior manager if supervisor may be implicated) and contain but not be limited to the following details:

- Date and time of breach;
- Nature of alleged breach; and

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- Supporting material.

The allegation shall be promptly investigated and the employee informed of the outcome.

Employees are encouraged to discuss matters and seek advice on how to proceed from supervisors and the operations manager.

Any employee/subcontractor found to be in breach of this (or any other) Indianic policy may be removed from their position (employment terminated) and escorted off site. The employee/subcontractor will not be paid for the lost time and associated transportation cost to safely remove them from site. If an employee and or subcontractor is on site and employment is terminated due to a breach of policy the employee/subcontractor may be liable for all travel expenses required to return them to their home. Further disciplinary action may be taken including but not limited to legal recourse.

### VALUE

The following are values which all Indianic personnel should aspire to:

- **Accountability** for your performance and results;
- **Honesty** about your performance and your opinions where required;
- **Tolerance** to different views and values;
- A **safe** and rewarding working environment;
- Open **communication** and consultation within the workplace;
- **Professional** standards and quality leadership;
- Accurate, timely and complete advice to management; and
- A **discrimination free** workplace where individuals are employed based on skills, merit and suitability to the tasks at hand.

### EDUCATION

The code of conduct shall be posted in Indianic office (Perth) and where possible in on-site dive control units to promote awareness. All employees and subcontractors will be required to read the code of conduct and sign the [Indianic Office Workshop Inductions – ADM-FM-016](#).

### REVIEW

The policy shall be reviewed annually with amendments made accordingly to ensure its relevance and effectiveness.



Michael Gray  
**Managing Director**

*\*\*This policy is reviewed and approved by the General Manager on an annual basis.*

