



CODE OF ETHICS POLICY (OHS-POL-004)

INTRODUCTION

The code of ethics applies to all employees and sub-contractors of Indianic Group Pty Ltd ("Indianic") and its subsidiaries. The policy is to ensure all Indianic employees, including management, understand what is considered 'ethical' behavior and be able to differentiate between 'right' and 'wrong' when carrying out their duties.

OVERVIEW

The Code of Ethics maintains that employees must:

- Place the integrity of their profession and the interests of clients above their own interests;
- Act with integrity, competence, and respect in regards to everyone and every situation employees encounter in their job;
- Maintain and develop their professional competence;
- Avoid personal, financial or other interests which may conflict with their responsibilities to Indianic. Such conflicts must be disclosed to the operations manager immediately;
- Not work for another organisation or conduct a business without permission from the Indianic managing director.
- Not use or disclose any information obtained through their employment with Indianic, other than required to complete their duties/responsibilities.

Indianic Management should employ good ethical practices in order to set a good example for employees.

VALUES, PRINCIPLES AND RESPONSIBILITIES

These are the key values, principles and responsibilities that all Indianic employees must recognise and abide by.

Integrity

Indianic employees must act with integrity when dealing with fellow employees, clients or subcontractors of Indianic. Employees must have strong moral principles and practice honesty and confidentiality and therefore trustworthiness.

Honesty

Indianic employees must never directly or indirectly engage in theft, fraud, bribery or any other activities to be considered 'corrupt' towards the organisation, its clients or any other party with whom the business has dealings. Some of the actions considered 'corrupt' are outlined in Indianic's *Anti-Bribery and Corruption Plan*, along with methods for identifying and preventing corrupt behaviour for all Indianic employees.

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Respect

Indianic employees must treat all fellow employees, clients and subcontractors with respect and dignity and provide a workplace free from bullying and harassment. Indianic values employees having respect for themselves and others. Respect includes respect for the environment; for other people's privacy, personal space and belongings; and for different viewpoints, philosophies, religions, genders, lifestyles, ethnic origins and physical abilities.

Environmental Awareness

Indianic is committed to minimising the impact of Indianic activities on the environment. Pollution prevention is key to Indianic's approach to work, aiming to reduce the potential for pollution through increased efficiency of processes and reduction of source pollution. Indianic also aim to reduce, reuse and recycle where possible.

Quality Assurance

Indianic management recognise that growth and prosperity depend on the provision of products and services which consistently meet or exceed client expectations when it comes to budgetary, time, specification, safety and environment etc.

Commitment to a process based quality management system is the key to achieving this objective.

Confidentiality

Indianic employees must not use or disclose any information obtained through their employment with Indianic, other than when required to in order 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).

Anti-Discrimination

Discrimination against Indianic employees, clients and subcontractors is strictly prohibited. Indianic employees must not discriminate against, bully or take adverse action against anyone involved with Indianic based on their gender, race, marital status, pregnancy, political opinion, religion or ethnicity.

Anti-Sexual Harassment

Behaviour that is sexually offensive, humiliating, intimidating and/or frightening is unwelcome and unacceptable within Indianic. All identified incidents and reports of such behaviour will be taken extremely seriously and investigated in accordance with the *Western Australian Equal Opportunity Act 1984*.

Accountability

Indianic employees are expected to carry out the duties and responsibilities outlined in their terms of employment. They must be accountable for their actions and decisions when carrying out work and have an obligation to report, explain and be answerable for consequences as a result of their mistakes or incompetence.

Competency

Indianic employees must demonstrate competent decision making, resolutions and must not misrepresent their qualifications, training or experience. Employees must demonstrate that they can carry out the responsibilities outlined in their terms of employment successfully and properly.

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Occupational Health and Safety

Indianic is committed to ensuring a safe, healthy working environment for all employees, contractors, sub-contractors, clients, visitors and the public. We are becoming an industry leader, providing an incident and accident free work environment through effective communication with all stakeholders and by implementing a *Quality, Safety & Environmental System (QSE)* and maintaining compliance with relevant OHS legislation and other legislative and regulatory requirements.

Anti-Drug and Alcohol

Indianic recognises that drug and alcohol abuse can have adverse effects upon an individual's ability to perform their duties safely and effectively, and as a consequence can endanger themselves, their fellow workers and the public. To ensure a safe working environment, it is Indianic employees/subcontractors responsibility to ensure they are not under the influence of drugs and/or alcohol during work hours.

Compliance

Indianic requires compliance from all employees and management with all Indianic company policies and all Australian legislation.

Each and every Indianic employee has a responsibility to uphold this Code of Ethics when carrying out their duties for Indianic.



Michael Gray
Managing Director

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

