

# Code of Conduct Policy

Linfox Armaguard Group

January 2021



**ARMAGUARD GROUP**

# Document details

Document title	Code of Conduct Policy
Issue date	January 2021
Review date	As required
Author	People & Capability
Version number	1.2

## Revision history

Version	Author	When	Description
1.1	Grace Kostelenos	February 2020	Policy launch
1.2	Grace Kostelenos	January 2021	Policy review

## Document approval

Responsible manager(s)	People & Capability Corporate
Approving manager(s)	Senior People & Capability Lead

# Code of Conduct Policy

---

## 1. Policy purpose

Linfox Armaguard Group of Companies also referred to as (**'Armaguard'**) in this policy has a reputation built on Loyalty, Integrity, Fairness and Trust. This requires the highest ethical practices and standards. Our people are expected to commit to and display those high standards in their dealings with each other, our customers, our suppliers and the public.

We expect our suppliers to understand and share our values and adhere to the same principles which underpin our Code of Conduct.

This policy is consistent with and is intended to support the LIFT values of Armaguard. The policy provides a guide for team members to help them identify and determine matters of ethical conduct that may arise during their employment. The policy is designed and written as a guiding set of principles rather than a prescriptive directive. Nothing in this policy detracts from the rights and obligations of team members under legislation.

This code of conduct does not stand alone and should not be read in isolation. Please refer to the supporting documents at the end of this policy.

In the event a local law, regulation or custom differs from the Code of Conduct, whichever sets the legal or higher standard is to be applied. Recognising that these decisions can be complex, it is your responsibility to seek appropriate senior or specialist advice if you are unsure or have questions regarding the standard to be applied.

## 2. Scope

This policy is intended to apply to all team members of Armaguard, regardless of location, level, or seniority within the business, including operations throughout the Asia Pacific region. Our customers, suppliers, and contractors or others that may be temporary engaged in performing work on behalf of Armaguard.

## 3. Responsibilities

All Armaguard team members have the following obligations:

- Compliance with laws and regulations;
- To conduct themselves in a manner that does not compromise their own safety, the safety of their team mates or that of the general public;
- To conduct themselves in line with the company's goals and values;
- Socially responsible and sustainable practices;
- Valuing and respecting all people by leveraging diverse background, experience and perspectives;
- Robust corporate governance;
- Displaying integrity with a proactive focus on risk awareness and management;
- Environmental stewardship by mitigating environmental impacts;
- Acting responsibly to mitigate risk and safeguard Armaguard team members, Customers, our brand, reputation, assets and information;

- Act ethically and appropriately when a conflict of interest arises between a team member's own interests and their duty to Armaguard;
- A duty of care to ensure personal relationships do not affect professional relationships; and
- Take suitable measures to avoid any situation where a conflict of interest or a perception of a conflict of interest can arise during interactions with team members, customers and suppliers;
- Protection of company data and confidentially.

If you become aware of conduct that may breach the law, the Code of Conduct, or Linfox Armaguard Group policies or procedures, you are required to report your suspicions to your line manager or supervisor. If you feel reporting to your line manager or supervisor is not appropriate or you feel uncomfortable, then you should report your concerns to a People & Capability representative or follow the described procedure as set in the Whistleblower Protection Policy.

Those in managerial or supervisory roles, from the Chief Executive Officer down, are responsible for ensuring that the team members they lead are aware of, and comply with, the Code of Conduct. They must lead by example and support Linfox Armaguard Group's goal of creating a culture where integrity is '*business as usual*'.

Violating the law, the Code of Conduct, or policies or procedures may result in disciplinary action, up to and including termination of your employment. Contractors, agents and suppliers who breach the Code of Conduct may also be subject to sanctions, up to and including termination or non-renewal of their contract.

## 4. Our People

Armaguard is committed to supporting and ensuring a diverse and inclusive work environment in which everyone is treated fairly and with respect. Armaguard has a Diversity and Inclusion policy which details how Armaguard recognises diversity and believes that diversity in our workplace helps us:

- Attract, retain and motivate team members from the widest possible pool of talent;
- Foster a culture that reflects our values of Loyalty, Integrity, Fairness and Trust;
- Improves diversity of thought, innovation, creativity and critical thinking;
- Create a dynamic environment that leads to higher performance and well-being and greater employment engagement and satisfaction.

Armaguard has a Workplace Behaviour policy which sets out the expectations where team members, clients, suppliers, contractors and anyone else we interact with in our work:

- are treated with dignity, courtesy and respect;
- can work without distress or interference caused by harassment, discrimination, bullying or any other inappropriate workplace behaviour;
- are treated equitably, that is, we recognise that differences exist between people and we accept and value those differences;
- are considered for selection in employment, promotion and development based on merit;
- are safe and participate in safe systems of work.

Non-compliance with this policy may result in disciplinary action, up to and including summary dismissal in the most serious of cases. (Please refer to the Grievance Policy). Team members who breach the law may also be personally liable for their action.

## 5. WHSE

Armaguard values and is committed to protecting the health and safety of all team members, visitors, contractors and any other person affected by its business activities. Armaguard's WHSE Policy promotes and embeds ARMACARE through strong leadership, a positive work health and safety and environment culture, and engaging all team members to incorporate WHSE into everything they do. As part of WHSE policy all team members must be fit for work including and impairment in line with our Drug and Alcohol Policy and may be subject to random Drug and Alcohol testing (Please refer to the Drug and Alcohol Policy).

## 6. Environmental

Armaguard's approach to environmental matters has been to monitor and improve its performance taking into account scientific knowledge and changing community expectations. The Armaguard Environmental policy is to be used to promote team member awareness, knowledge, skills and capabilities of environmental management issues. It is everyone's responsibility to contribute to protecting the environment. Armaguard takes the protection of our air, water and earth very seriously.

Armaguard is committed to understanding and minimising any adverse environmental impact caused or contributed to by our operations, whilst continuing to meet the expectations of our stakeholders. The aim is to achieve a sustainable balance between environmental protection and economic development that is in the interest of future generations.

## 7. Transparency and Governance

Armaguard uses a risk assessment framework to assess enterprise risk exposure and risk mitigations strategies. Armaguard's internal audit function regularly audit departments within Armaguard to ensure compliance and monitor changes which may impact on the risk environment.

## 8. Fraud

Armaguard adopts an integrated approach towards managing fraud that includes prevention, detection and investigation as part of the company's overall business risk management. Armaguard is committed to preventing any attempt, whether by contractors, agents, intermediaries or its own team members to dishonestly obtain a benefit by deception or other means.

Armaguard has a zero-tolerance attitude to fraud. This does not mean that Armaguard will not expose itself to the possibility of fraud. The company recognises that it operates in regions that possess a high inherent risk of fraud and corruption. Armaguard acknowledges that it is likely that some incidents of fraud will occur with respect to its business. However, Armaguard requires that all incidents of suspected or actual fraud are pursued.

Armaguard has in place robust processes and controls designed to prevent, detect and respond to incidents of fraud and corruption. The company will investigate incidents of fraud brought to its attention, seek recovery for misappropriated funds or assets, and seek to prosecute offenders where appropriate.

## 9. Bribery and corruption

Armaguard prohibits all forms of bribery and corruption.

Bribery involves the payment or offer, or the receipt or demand, of anything of value with the purpose of influencing a person to give an unjust business advantage.

Corruption is dishonest activity in which a director, team member or contractor acts contrary to the interests of Armaguard and abuses the position of trust in order to achieve some personal gain or advantage for themselves or for another person or entity.

At Armaguard we do not offer, pay, demand or receive any undue benefit or advantage to or from any person in order to obtain, retain or direct business, or to secure any unjust advantage in the conduct of our business.

## 10. Conflict of Interest

Our personal interests or activities must not conflict with our responsibilities to Armaguard. Conflicts of interest can sometimes be subtle and difficult to recognise so we must always be vigilant to avoid even the perception that a conflict of interest may exist in our business dealings. (Please refer to the Conflict of Interest Policy)

You must avoid situations where:

- you or your immediate family members hold positions, or have financial interests in, or have relationships with a competitor, customer or supplier that may create an actual or perceived conflict of interest;
- you are in a position of influence with regard to the employment conditions or performance assessment of a family member;
- you take additional employment outside Armaguard with organisations, or run your own business, if the employment or activity may create an actual or perceived conflict of interest.

You must immediately advise your line manager or supervisor of any actual or potentially perceived conflict of interests.

After considering the particular circumstances you may be required to excuse yourself from involvement in any decision-making process where you have, or may be perceived to have, an interest that influences your ability to make an objective decision.

## 11. Company assets

Use Armaguard assets as if you paid for them yourself, or they are yours. You are obligated to treat Armaguard assets with care. This extends to all company property including but not limited to vehicles, mobile phones and computer equipment. Every team member has a responsibility to use company assets appropriately and to avoid waste and abuse. Company assets are provided solely for business purposes. Nonphysical assets include our brand, reputation and trademarks.

Never use Armaguard assets for non-company purposes or to support a personal business.

## 12. Protection of Information and Assets

We are all responsible for ensuring we always do business in a secure way, limiting risk to f any leakage or loss of business data and any damage tor misuse of our information systems. We should be particularly careful in protecting the Companies confidential business data that references any information that the Company has not disclosed or made generally available outside the business.

### 12.1 Information Protection Policy

- Ensuring our business data and information systems are protected for wide range of threats that could negatively impact on the confidentiality, integrity of our business data and information systems.

### 12.2 Social Media

- When participating in social media, you must not state your personal opinions on behalf of the Company unless you are authorised to do so. Make inappropriate comments, attacks towards other team members, customers, suppliers, or any other stakeholder. Ensure that references to our company, use of Armaguard logos or any photos while on the job or in company uniform or vehicles may be determined to breach our Code of Conduct policy.

## 13. Privacy and Personal Data

At Armaguard we value and safeguard the privacy of all our team members, job applicants, customers, and business partners. It is every one's responsibility to adhere to the core principles when we handle personal data:

- Process data lawfully, fairly and in a transparent manner.
- Keep data accurate and up to date
- Ensure appropriate security of personal data

## 14. Accurate Maintenance of Business Records

Accurate record keeping and reporting of financial and non-financial information reflects on our company's reputation and are an important part our obligations along with reflecting our values of Integrity.

The term business record can be interpreted broadly, every company document, even an apparently insignificant one, must be accurate, complete and comply with company reporting periods.

Examples of Business records, but not limited to the following:

- Expense and travel data
- Myosh reports
- Team member payment data and Kronos Data
- Invoices
- Performance Development Plans
- Financial reporting
- Audit Documents
- Toolbox and Training records

## 15. Prohibited actions

The following actions by team members are prohibited:

- Transmitting to third parties or otherwise using for personal gain Armaguard property, results, materials, records or information.
- Using for personal gain or otherwise unauthorised purposes confidential or privileged information acquired in the course of their work with Armaguard including, designated medical, or personal records, contractor selection decisions in advance of official announcement, business development targets, pricing strategies etc.
- Participating in the negotiation, recommendations or approval of agreements between Armaguard and other organisations in which the team member has a financial interest
- Participating in the negotiation, recommendations or approval of agreements between Armaguard an individual, with whom they have a personal relationship as defined above, has a financial interest, employment or a consulting agreement.
- Accepting gratuities, gifts or special favours from organisations with which Armaguard does or may do business with or extending gratuities or special favours to team members of other organisations except where they are:
  - “small” gifts that are occasional or seasonal in nature e.g. Christmas
  - unsolicited with no strings attached or expectation of reciprocity
  - received well after any transaction
  - in recognition of an existing commercial relationship
  - not transferable and have no refund value
  - low in value by reference to the seniority of the recipient
- Using Armaguard resources for any purposes other than the performance of the team member member’s duties except in a purely incidental manner e.g. a local telephone call.
- Acceptance of employment, an official relationship or a consulting arrangement with another organisation with which Armaguard has or may have a business relationship.

## 16. Decision making

It is sometimes difficult to make decisions when faced with a difficult situation, however taking no action can of itself have serious consequences. The Code of Conduct can help you determine what is appropriate when it comes to working ethically and with integrity.

### 16.1 What if I can’t determine whether a decision is legal?

If you cannot determine whether a decision is legal, contact your line manager or supervisor immediately. They will either assist with the decision making or contact the legal department for further clarification.

### 16.2 What if I can’t determine whether a decision is a breach of our values or code of conduct?

If you are unsure speak up and seek assistance. Speak to your line manager or supervisor or a specialist person such as People & Capability, Legal or Security.

### 16.3 What if I cannot find a copy of the Code of Conduct or any other policies?

All policies and the Code of Conduct are available on the Internet. If you are unable to locate a copy of any of these documents, please ask your line manager or supervisor to provide you with a copy.



#### **16.4 What if one of my relatives works for an Armaguard customer?**

It is important that Armaguard is made aware of the situation so appropriate action can be taken to avoid potential conflicts of interest from affecting, or appearing to affect, decisions you make. For example, it will be important to ensure you have no involvement in any Armaguard procurement decisions involving your relative's employer.

#### **16.5 What if I'm not sure there is a conflict of interest?**

That in itself is a good reason to seek advice. If you can't decide then it may be possible that a conflict of interest exists, or someone may perceive a conflict of interest exists. It is not possible to detail all the potential conflicts of interest here or in the Conflict of Interest policy. Please seek advice and contact People & Capability or the Legal department.

#### **16.6 What if I use a company asset such as my mobile to call a family or print a personal document?**

Reasonable personal use of company assets is allowed as long as the cost to Armaguard is of no consequence and your work is not adversely affected. Good judgment must be exercised.

## **17. Speak up**

Every team member has an obligation to immediately report any concern or suspicion they have relating to breaches of the law, the Code of Conduct or other policies. We empower our team members to take action regarding ethical issues through our LIFT values. You have several avenues to voice your concerns.

- Your first point of contact should be your direct supervisor or line manager. These people are likely to be closest to your situation or circumstances and can be a good resource to quickly confirm or resolve your issue. They have a responsibility to listen and provide assistance. Management or supervisory roles are required to implement an environment of trust and openness so that team members reporting to them feel comfortable in voicing their concerns or questions.
- If you are not comfortable speaking to your supervisor or line manager, or you believe it is not appropriate to discuss the concern with them (for example, you may believe they are involved in wrongdoing), contact your People & Capability, Legal or Security representative.

#### **17.1 Your concerns will be treated seriously and dealt with promptly**

Whichever avenue you choose to report your concern you can be confident that it will be treated seriously and actioned promptly. Depending on the nature of the allegation, Security, Legal and/or People & Capability, may be involved in addressing the issue. To the extent permissible by law, Armaguard will maintain confidentiality. To the extent appropriate, you will be informed of the outcome of any investigation. For further information please refer to the Whistleblower Protection Policy.

#### **17.2 But what if my manager has asked me to do something that breaches policies, the Code of Conduct or the law?**

**If I report my concern, I think my manager will make my life difficult.**

We usually recommend speaking to your line manager about ethical dilemmas, however because in this case they may be involved in the wrongdoing, speaking to them is clearly not appropriate. In this case speaking to someone from People & Capability, Legal or Security is a good option, or if you feel uncomfortable doing that call the Integrity Hotline. You can be confident that your concern will be treated seriously and that Armaguard will not tolerate any harmful action being taken against you.

### **17.3 But what if I think something is not quite right, but I have no proof?**

Remember you do not have to have proof before you report your concern. It is very important to report your concerns early, we have qualified and experienced investigators who can appropriately investigate concerns and obtain proof if it is available. We strongly discourage team members from attempting to investigate matters themselves.

### **17.4 But what if I reported something but never heard any more about it?**

Remember, if you made a report anonymously you will not be able to be updated on progress. Also, depending on the nature of the report and how the matter is resolved, you may not observe any action taking place in the workplace. The nature of the issue may also determine the extent to which you can be given details of the outcome, however if you have disclosed your identity to the manager it is likely that you can at least be informed that your issue was investigated and dealt with in some way. In that case contact the manager you initially reported your concern to and seek feedback.

### **17.5 But what if someone makes a report that is false, or otherwise not in good faith?**

Abuse of the Integrity Hotline for personal gain or otherwise is viewed as a breach of the Code of Conduct and may lead to disciplinary action. Armaguard will not tolerate any harmful action being taken against the person if the report was made in good faith, even when after further investigation the concerns were not substantiated.

## **18. Administering the Code**

### **18.1 Training**

Training in relation to the code will be conducted on at the commencement of your employment and on a regular basis. If you have any queries around this or other training please refer to your line manager or People and Capability representative.

### **18.2 Investigations**

Investigations into breach of the Code of conduct or any other alleged breaches of company policies will be conducted independently and will follow process outlined in our workplace behaviour and equal Opportunity policy.

## **19. Supporting documents and resources**

Linfox Armaguard Group:

- LIFT Values
- WHSE Policy
- Diversity and Inclusion Policy
- Grievance Policy
- Conflict of Interest Policy
- Anti-Corruption and Bribery Policy
- Whistle-blower Policy
- Enterprise agreements, Awards, Collective Agreements
- Drug and Alcohol Policy
- Australian Fair Work Ombudsman <https://www.fairwork.gov.au/>
- New Zealand Ministry of Justice <https://www.justice.govt.nz/>