



## KEY TERMS

In these policies, the following words and expressions have the meanings given to them below.

**Mountcastle or Group** – means Mountcastle Pty Ltd and any associated subsidiaries.

**Employee** – means anyone employed by Mountcastle on a permanent, fixed term or part time basis.

**Casual employee** – means anyone who is employed by Mountcastle with no firm advance commitment to ongoing work with an agreed pattern of work.

**Contractor** – means anyone providing services through an independent contracting agreement.

**Customer** – any person or business that buys goods or services from Mountcastle and any associated subsidiaries.

**Senior Leadership Team** – management roles reporting in to the CEO

## Document Control

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Mountcastle expects its employees and contractors to meet high standards of performance and behaviour in all their dealings with colleagues, customers, and visitors to its premises. Mountcastle is committed to not only complying with its legal obligations, but also acting ethically and responsibly in relation to all interactions with its customers and the community.

## Scope

This Code of Conduct sets out the standard of conduct required to be met by all Employees of Mountcastle. For the purpose of this Code of Conduct, Employees include Casual Employees. It applies to you whenever you are acting as a representative of Mountcastle. This may include occasions when you are outside your normal workplace or working hours, such as work functions, out of hours work activities, or when you are travelling or elsewhere in the community representing Mountcastle.

This Code of Conduct exists for the benefit of Mountcastle and does not form part of any contract of employment, however it is a condition of employment that employees comply with it.

The Code of Conduct cannot provide guidance for all potential situations, and therefore common sense, honesty, integrity and fairness should be applied in all circumstances.

## Conduct requirements

As an Employee or Associate of Mountcastle, you are expected to adhere to and uphold the following conduct requirements in the performance of your duties or services:

1. Behave ethically and with integrity at all times.
2. Be respectful and inclusive in your interactions with others.
3. Work to the best of your ability, giving proper attention and care to the job.
4. Comply with all lawful and reasonable directions and instructions from your Manager, the CEO or other members of the Senior Leadership Team.
5. Maintain a cooperative and collaborative approach to working relationships which includes sharing relevant information with others and adopting respectful behaviours and language in your interactions with others.
6. Be reliable and punctual for work.
7. Follow the Group policies and procedures.
8. Observe safe work practices and report hazards, incidents, injuries or unsafe work practices.
9. Report any behaviour considered to be unethical or inappropriate by this Code of Conduct to your Manager, member of the management team or the CEO.
10. Use materials, equipment, supplies and other resources wisely and prevent their misuse.

## Conflicts of interest

You are expected to devote your best efforts to the interests of Mountcastle in the performance of your duties or services.

You must avoid any conflict between the interests of Mountcastle and your own personal interests. A personal interest may be direct, indirect, financial or non-financial.

Unless you have the written approval of the CEO, employees are not permitted to take up employment or any form of paid or unpaid work with a competitor or an organisation doing business or seeking to do business with Mountcastle.



Employees are permitted to engage in outside work activities, unless the activity conflicts with Mountcastle's interests. Outside work activities may give rise to a conflict of interest if:

- a) it places you in a position of appearing to represent Mountcastle;
- b) it prevents you from fully performing work for which you are employed or engaged to perform at Mountcastle (including reasonable overtime);
- c) it lessens the productivity or efficiency reasonably expected of you in your job; or
- d) it is for an organisation or individual whose business competes with Mountcastle.

From time to time, Employees may be reasonably required to work hours in addition to your ordinary hours of work in order to successfully perform your role. In cases of conflict with any outside work activity, your obligations to Mountcastle must be given priority.

### *Disclosure of potential conflict of interests*

You must disclose any possible conflicts so that Mountcastle may assess and prevent potential conflicts of interest from arising. A potential or actual conflict of interest occurs whenever you are in a position to influence a decision or action that may result in a personal gain for yourself, family member, friend or business associate as a result of dealings with Mountcastle.

If you have any questions whether an action or proposed course of conduct could create a conflict of interest, you should immediately contact your Manager to obtain guidance.

### **Acceptance of Gifts**

Special care must be taken when accepting gifts or benefits as they may create a sense of obligation to the donor. You must declare any gift or benefit above \$300 value to your Manager so that a decision may be made as to whether to accept or return the gift or benefit or to share it with work colleagues. Managers should keep a record of any declared gifts.

### **Confidentiality**

Both Employees and contractors will receive or have access to information that is confidential to Mountcastle and its associated entities (**Group**).

Examples of confidential information include:

- a) any information in respect of a supplier or customer; specifically, customer details including address and contact details, or associated records;
- b) financial or business information related to the Group that is not publicly available or known;
- c) information that is intended for distribution only within the Group; and
- d) any other information that is identified as confidential (collectively **Confidential Information**).

You are not authorised to disclose or discuss Confidential Information outside the Group and should only disclose such Confidential Information to those people within Mountcastle who need to know the information in the course of their work, unless specifically authorised otherwise.

Customer and supplier information or commercially sensitive documents, records and files are to be stored securely and not left visible or accessible. Computer access passwords, where applicable, must not be shared or revealed to others.

Your obligation to keep Confidential Information confidential continues after your contract and/or employment with Mountcastle ceases.



## **Use of equipment**

Mountcastle provides equipment, and materials necessary for Employees to perform their role.

You are expected to exercise care in the use of the Group equipment and property and use such property only for authorised Group purposes. Loss, damage or theft of Group property must be reported immediately. Negligence in the care and use of Group property may be considered a breach of this Code of Conduct.

At the conclusion of your employment or contract, you must return all Group property (eg: cars, computers, phones, credit cards, etc), confidential information, equipment, keys or access passes in your possession or control.

## **Anti-bribery**

Mountcastle has zero tolerance towards all forms of bribery or corrupt practices. You might, at times, be pressured to make payments or payments in kind to induce others to act in favour of Mountcastle.

The offering and accepting of bribes to and from individuals or entities to procure customer work or to influence a business decision that affects Mountcastle is prohibited and deemed to be misconduct.

Making or requesting such payments could compromise everyone involved, and may expose Mountcastle, you and others to criminal prosecution and serious penalties.

## **Suspected breaches of the Code of Conduct**

If you suspect or know that a person has breached the Code of Conduct, you must contact your Manager immediately.

If you think you may have breached the Code of Conduct (either knowingly or accidentally) it is in your best interests to speak with your Manager immediately.

Mountcastle will take the necessary steps to investigate the alleged breach in accordance with principles of procedural fairness to determine whether there has in fact been a breach of the Code of Conduct.

If you, or another individual, is found to have breached this Code of Conduct, Mountcastle may take disciplinary action, which for Employees, may include termination of employment.



## **Grievances and Resolving Disputes**

Should an employee have any grievances or disputes with respect to their employment or engagement, treatment, the action of another employee or contractor or customer or compliance with this Code of Conduct or other Mountcastle Group policies or procedures, then they should raise them by initially approaching their Manager with a description of the grievance or dispute, and attempt to amicably and professionally resolve the matter.

If the grievance or dispute is not settled in this way, or if it is inappropriate to be raised with an Employee or Associate's Manager, then the matter should be raised with the CEO or other member of the management team.

## **Review**

Mountcastle will review this Code of Conduct on a regular basis to ensure that it reflects any relevant legislative changes and remains consistent with the Group values.