

Policy Name:	Code of Conduct & Core Values
Policy Number:	4.01
Date:	February 2023

POLICY STATEMENT:

As a company we conduct our business according to the highest standards of business ethics. Our employees are also expected to conduct themselves with the best interests of the company in mind. Listed below are specific policies that everyone at JC Steele is expected to strictly adhere to. Also included below are our six core values which summarise the way we operate as a company and how we expect each individual to conduct themselves.

JC Steele believes in these long-standing fundamental elements of professional conduct. We fully expect that all employees will be able to give complete commitment and wholehearted support to these standards. While this document does contain some specific points, every possibility and eventuality can never be anticipated.

Each employee's good judgment, integrity, candor, and good example will always be needed to implement these basic principles. We also believe that if all employees follow the standards and the spirit set forth an appealing work environment will exist throughout JC Steele and the reputation of each employee, and the JC Steele business will be enhanced.

To ensure the wellbeing of all employees, violations of JC Steele regulations & standards will result in corrective action appropriate to the offense. The severity of corrective action in response to the violation will be determined by such considerations as the impact of the offense on JC Steele, the extent of damage caused and the circumstances of the offense.

Full, factual, and timely disclosure of any situation that would appear to be in conflict with the interest of JC Steele is required. Consent to a specific situation may, at times, be granted by the General Manager when circumstances are clearly understood, and the company is not adversely affected.

PROCEDURES:

1. Financial Interests

- a) No employee or immediate family member (spouse and children) is to have a direct or indirect financial interest in a competitor or with any enterprise which transacts or is likely to do any business with the company as a vendor.
- b) Ownership in a private company that does or may do business with or is a competitor of the company or its affiliates is never permitted.
- c) Any investment in a listed public company that does or may do business with, or is a competitor of, the company or its affiliates, that is greater than \$10,000 or 1% (one percent) of the outstanding stock must be disclosed to management.

- d) Providing services or receiving any compensation as a director, manager or consultant to any outside concern that does business or competes with JC Steele is permitted only with the company's prior knowledge and consent.
- e) No employee will solicit, directly or indirectly, business from any business entity with which the company does or may do business on behalf of him/herself or a family member.
- f) The use or diverting of any company information, product, program or patent for personal gain or to any person or entity is not permitted.

2. Illegal Practices

Employees who engage in any of the following activities, which are considered illegal practices, will be immediately discharged.

- a) Employees are strictly prohibited from being negligent or deceitful when filling in their time sheets.
- b) Employees are strictly prohibited from removing any company property from the premises without proper authorisation.
- c) There cannot be any willful destruction or damage to any property of the company or of any other employee.
- d) Employees are strictly forbidden to falsify, alter, destroy or remove company reports or records, or to assist others in doing so.
- e) Employees are strictly forbidden from falsifying records or statements to obtain employment, disability or other insurance including workers compensation payment
- f) Employees will refrain from publicly criticising JC Steele, its services, its personnel or its vendors, it's customers or soliciting other employees to leave the company.
- g) Employees will not deliberately suppress or distort product knowledge.
- h) Employees will not copy, steal or use any JC Steele intellectual property to benefit themselves or others during the course of their employment or when ending their employment.

3. Bias and Discrimination

- a) Employees may not exclude or deny services or benefits to any customer or other company employee on the grounds of race, color, creed or national origin, nor grant any discriminatory consideration or advantage.
- b) Employees will conduct their professional business in such a way that does not expose a customer or client of JC Steele to unnecessary embarrassment or disparagement.

- c) Employees may not discriminate unfairly by dispensing special favours or privileges to anyone, nor accepting favours or benefits under any circumstances that might be construed as an influence on the performance of their duties.

4. Conflicts of Interest

Team members should be honest in performing their role and avoid conflicts between their private interests and those of their responsibilities to JC Steele.

Conflicts of interest may arise when a team member is in a situation where personal circumstances are affected by the decisions or duties carried out in their role. A conflict may arise when any of the following are involved:

- a) Financial interests
- b) Personal or sexual relationships
- c) Personal beliefs
- d) Outside employment
- e) Political participation
- f) Use of confidential information
- g) Use of facilities, equipment and resources and/or
- h) Acceptance of gifts or benefits.

All employees must act responsibly and report any actual or perceived conflicts of interest that arise as part of their role. If there is any question as to whether a conflict exists, the team member must discuss the circumstances with management to determine whether a conflict exists. Appropriate strategies will be developed to manage any reported, or perceived, conflicts of interest.

5. Diligence

Employees are expected to carry out their duties in a professional, ethical and diligent manner at all times. This means staff must:

- a) Make decisions fairly, impartially & without bias, using the best factual information available
- b) Keep records and documentation to support their decisions
- c) Always aim to achieve the highest possible standard of performance
- d) Continuously develop their knowledge in their professional fields and areas of responsibility

- e) Exercise best judgement in the interests of JC Steele
- f) Maintain adequate documentation to support decisions made
- g) Ensure outside interests do not interfere with their ability to meet the responsibilities of their role
- h) Adhere to professional codes of conduct and standards of ethics
- i) Act responsibly when becoming aware of any unethical behaviour or wrongdoing by any other person. This may involve a report to your manager or the Managing Director.

6. Economy & Efficiency

- a) Employees should use JC Steele resources, facilities and intellectual property only for legitimate purposes related to their role with JC Steele
- b) Team members should avoid waste or minimise it where avoidance is not possible
- c) Team Members should maintain sufficient security & protection of JC Steele property, facilities, resources and intellectual property.

7. JC Steele Core Values

TEAMWORK

Contribution to the team reflected in flexibility, reliability, dependability, commitment to own and team goals, communicating effectively, consulting with, and acknowledging others.

CUSTOMER FOCUS

Focuses on the best outcomes for the business and the client and demonstrates a commitment to meet clients' needs and requirements with professionalism.

POSITIVE WORK ETHIC

This includes demonstrating a 'can-do' attitude, positivity, motivation and the ability to use initiative and get things done.

HONESTY & INTEGRITY

Demonstrating honesty and fairness, being 'up-front' in communications, being consistent, and professional.

RESPECT

Being friendly, approachable and courteous, and receptive to others' ideas. Responding in a timely manner. Treating the workplace, other employees and the business environment with respect at all times.