

EMPLOYEE CODE OF CONDUCT

BIC Policy 018 - Issue Date: 16.10.2023

Purpose

Our Employee Code of Conduct defines how B.I.C. Services Pty. Limited (BIC) employees should act on a day-to-day basis. It reflects the company's daily operations, core values and overall company culture. It outlines our expectations regarding employees' standards of behaviour when interacting with clients, colleagues and the company as a whole. We promote freedom of expression and open communication, but we expect all employees to follow our Code of Conduct by ensuring that decisions made are ethical, impartial, fair and lawful. We also expect all employees to foster a well-organised, respectful and collaborative environment. Our Employee Code of Conduct will help build a values-based company that will promote client confidence and trust when working with BIC.

Scope

This policy applies to all our employees, regardless of employment agreement or rank.

Core Values



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Code elements

We outline the components of our Code of Conduct below that all employees must read and comply with:

- 1. Compliance with law** - employees must protect our company's legality and comply with the law wherever you are. You should comply with all environmental, safety and employment laws. You must act according to what you have been lawfully directed to do by someone in authority, or to behave according to a lawful rule or instruction.
- 2. Follow our Core Values** - we expect employees to be ethical and responsible when dealing with our company's finances, products, services, partnerships, public image and abide by our six Core Values: Safety, Respect, Customer Focus, Teamwork, Honesty and Commitment to Employees. The reputation of BIC can be affected by the actions and decisions that you make.
- 3. Equal Opportunity Employment** - employees must follow BIC's Equal Opportunity and Diversity Policy in all aspects of their work, from recruitment and performance evaluation to interpersonal relations. Employees must be treated on the basis of their individual merit and not because of irrelevant personal characteristics. We strictly prohibit discrimination, bullying or harassment in any form on the basis of race, color, religion, national origin, sex, gender identity or expression, age, or any other characteristics protected by law.
- 4. Protection of Property** - employees should treat our company's property, whether material or intangible, with respect and care. Employees should not misuse company property or use any client property - employees should use them only to complete their work duties. Employees should protect company and client facilities and other material property from damage and vandalism, and immediately report any issues to their manager.
- 5. Professionalism** - employees must show integrity and professionalism in the workplace, including when talking on the phone or sending any correspondence or emails. You must consider the implication of your comments, actions, decisions and conduct when dealing with clients, colleagues and other stakeholders.
- 6. Privacy and Security** - always remember that we are working within our client's properties and in the course of performing cleaning services, employees may come across confidential information. This information belongs to our client and as such must be kept protected and confidential at all times and not be disclosed to any person, firm or corporation. Employees must follow BIC's Security and Privacy Policy. The company security procedures and policies strictly forbid the use of client property or any unauthorised access to their property or data. Any keys, swipe cards and access codes must be kept safe and not be given or loaned to anyone - these must remain on your person at all times while at work and any loss of these items must be reported immediately.

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7. **Safe Workplace** - BIC is committed to a healthy and safe work environment for our employees, suppliers, clients and customers. Employees are expected to follow all safety and environmental rules and practices. Safety should be considered in everything you do and take the necessary steps to protect yourself and others in the workplace. We all play a part to ensure that the workplace is free from hazards and you must immediately report any all accidents, injuries and unsafe practices or conditions.
8. **No Retaliation** - you are the eyes and ears of our company, and we value your help in avoiding and uncovering possible misconduct. We strictly prohibit retaliation of any kind against anyone who shares a good-faith concern or participates in an investigation. Sharing a good-faith concern about the Code honestly, even if it turns out to be unfounded, is never an excuse for any kind of retaliation.
9. **Personal Presentation** - personal presentation at work includes your physical presentation, personal hygiene, how you speak, get along with others and deal with issues that come up at work.

Uniforms must be worn at all times. Cleaning staff must wear black pants, BIC shirt/polo (where provided), closed black shoes and black socks, along with their identification cards/pass. Cleaners should not wear any jewelry that could get caught and only stud earrings should be worn. Corporate staff must wear suit or similar attire (please refer to BIC's BIC Corporate Suit Program and Style Guide).

Clothes must be neat and clean, and uniforms should be ironed. Hair should be neat. You must be showered, clean and wear deodorant and perfume/aftershave. Always wash your hands after completing tasks.

10. **Drugs and Alcohol** - employees must follow our Drug and Alcohol Policy. Consumption of alcohol is banned on all BIC work sites. Illegal drugs are strictly prohibited. If a manager has reasonable suspicion to believe that an employee is under the influence of drugs and/or alcohol, the manager may request an alcohol and/or drug test. If a test is refused, then this will be seen as an admission and will also lead to immediate termination. A breach of this policy will result in termination.
11. **Smoke free workplace** - all BIC work sites are non-smoking. No one is authorised to smoke in the building or anywhere surrounding the building and within 20 metres of the work site. If you have an authorised break and wish to smoke in a designated smoking area, you must ensure that you are the required distance from the work site and have covered your work uniform with a jacket, shirt, etc. - the company logo must not be visible at any time.
12. **Corruption** - we discourage employees from accepting gifts, in any form, from clients or partners. We prohibit bribes or cash payments for the benefit of any external or internal party. We expect honesty and ethical behaviour. If you are offered a bribe or cash payment, then you must report this to your manager and BIC's Human Resources (HR) department.

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- 13. Anti-Money Laundering** - BIC has a zero-tolerance policy towards money laundering, and is committed to the highest level of openness, integrity and accountability. The penalties for these offences are severe and can mean imprisonment and/or an unlimited fine for the employees and executives responsible. Money laundering covers a wide variety of crimes, it can include anything from which individuals or companies derive a pecuniary benefit, directly or indirectly, and can include many crimes that are not initially thought of as connected with money laundering. Money laundering is the process by which criminally obtained money or other assets (criminal property) are exchanged for 'clean' money or other assets with no obvious link to their criminal origins. Criminal property may take any form, including money or money's worth, securities, tangible property and intangible property. It also covers money, however come by, which is used to fund terrorism. Money laundering legislation applies to all employees. Any member of staff could be committing an offence under the money laundering laws if they suspect money laundering, or if they become involved in some way and do nothing about it. If any employee suspects that money laundering activity is or has taken place or if any person becomes concerned about their involvement, it must be disclosed as soon as possible to BIC's HR. Failure to do so could result in them becoming personally liable to prosecution.
- 14. Job duties and authority** - employees should fulfill their job duties in a safe manner and with integrity and respect toward clients, stakeholders and the community. Supervisors and managers must not abuse their authority. We expect them to delegate duties to their team members, taking into account their competences and workload. Likewise, we expect team members to follow team leaders' lawful instructions and complete their duties with competency, skill and in a timely manner. We encourage mentoring throughout our company.
- 15. Absenteeism and tardiness** - employees should safely follow their work schedules, sign in and out of Deputy and be ready for work on time and not leave work early. We can make exceptions for occasions that prevent employees from following standard working hours or days, with the written authorisation from their supervisor or manager. BIC does not expect you to come to work if you are genuinely sick. If you are unable to come to work, you must give as much notice as possible so your shift can be covered, and you are required to provide a medical certificate or Statutory Declaration.
- 16. Conflict of interest and inter-work relationships** - conflict of interest arises where an employee has private interests that could improperly influence, or be seen to influence, their decisions or actions in the performance of their duties and these may be actual, potential or perceived.

This clause also applies to employees who are in a consensual personal relationship and both have a professional relationship in BIC. Consensual personal relationships between a subordinate and their manager represents a potential conflict of interest. **Any relationship in the workplace should be declared to the department manager and HR.** Note: Any disclosure made, will be treated in confidence and only revealed to those with a genuine need to know in BIC.

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We expect employees to avoid being influenced by any personal, financial or other interests that might hinder their impartial decision making and capacity or willingness to perform their work duties. You must not use your position or business information to benefit at the expense of BIC. You must not ask for gifts or benefits that will benefit you personally. If you are offered any gift or benefit, you must decline it and report it to your manager and BIC HR.

17. **Collaboration** - employees should be friendly and work collaboratively. You should try not to disrupt the workplace or present obstacles to their colleagues' or client's work.
18. **Communication** - employees must be open for communication with their colleagues, supervisors or team members. If you do not understand a direction or task given to you, it is your responsibility to ask for clarification. A misunderstanding may lead to work not being done or completed on time.
19. **Benefits** - we expect employees to not abuse their employment benefits. This can refer to time off, personal carer's (sick) leave, insurance, facilities or other benefits BIC offers.
20. **Policies** - employees should read and follow BIC's and related policies. If you have any questions, you should ask your manager or BIC HR.
21. **Disciplinary action** - BIC may have to take disciplinary action against employees who repeatedly or intentionally fail to follow our Code of Conduct, policies or procedures. Disciplinary action will vary depending on the seriousness of the violation or conduct. Possible consequences include demotion; reprimand; suspension or termination for more serious offenses; and detraction of benefits for a definite or indefinite time. We may take legal action in cases of corruption, theft, embezzlement or other unlawful behavior.

If you have a questions or concern, you can contact your manager or BIC's GM – People & Culture.



Tony Gorgovski
Chief Executive Officer