

CODE OF CONDUCT AND ETHICS POLICY

REVISION 0

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1. PURPOSE

Advanced Technology Products Pty Ltd (ATP) is a professional business and we pride ourselves on providing a service that consistently meets or exceeds the standards expected of our customers and clients. ATP fosters a respectful and safe workplace. This means that employees must behave in a professional manner at all times and adhere to appropriate behaviour in all business settings.

This Policy aims to establish acceptable professional conduct in all areas and outlines ATP ethical principles and professional standards of conduct all employees are expected to uphold.

Employees will respect the structure and responsibilities of the board of directors, provide them with facts and advice as a basis for their making policy decisions and will uphold and implement policies that are adopted by the board of directors.

ATP as a whole will keep the community informed about issues affecting it.

Employees will avoid any interest or activity that is in conflict with the conduct of their official duties and will respect and protect privileged information to which they have access in the course of their official duties.

Employees will strive for personal and professional excellence and encourage the professional developments of others.

2. SCOPE

This policy applies to all employees and contractors and is additional to the legal, moral and duty of care obligations required.

3. POLICY & LEGISLATION

All employees must be aware of and comply with ATP policies, procedures, operating manuals/forms, work instructions and any Workplace Agreement and/or employment contract and position description applicable to their role.

Employees must not commit or attempt to commit any act which may jeopardise Company policy, procedures, legislation or relevant state and federal laws.

4. VISION

To become a trusted partner and technical solutions provider in the life and asset safety systems industries.

5. COMPANY VALUES

ATP makes a commitment to our employees through:

- Providing a safe working environment
- Stability in employment
- Reward and recognition
- Empowerment with accountability

Further, ATP is committed to aligning our business operations with our clients' requirements by:

- Being flexible and agile
- Forming and maintaining long term relationships
- Acting with integrity
- Taking responsibility for our work and our actions
- Acting in a sustainable manner

6. CORPORATE SOCIAL RESPONSIBILITY

ATP recognise that our Corporate Social Responsibility (CSR) is of utmost importance to interested parties, including employees and clients, and is fundamental to the continued success of the organisation.

ATP believes that its CSR outlined in this Policy shall provide long-term benefits to its employees, clients and individuals in communities around the world, and will focus on the following areas:

Employees - ATP respects employee values and provides good work conditions and equal opportunities. We improve employee satisfaction by offering training for their greater benefit and quality of life.

Health and Safety - We ensure health and safety is the main focus in all activities and processes.

Environmental Impacts - ATP maximise recycling opportunities and minimise the risk of pollution, waste and nuisance to neighbours.

Sustainable Development - We strive to leave positive and sustainable lasting impressions with the communities that we interact with by meeting social and economic needs.

Relationships with Customers - ATP are responsive to client needs and provide a quality assured service that incorporates all relevant legislative considerations.

Suppliers and Partners - We treat suppliers fairly and drive CSR codes of practice throughout the goods and services supply chain.

Community Involvement - ATP give generously to charities and engage with local communities through funding and support.

Ethos - We encourage high standards of professionalism throughout the company and promote best practice in respect of ethical behaviour.

7. EMPLOYEE STANDARDS

Whilst at work and when outside of the workplace, representing the Company, employees must act in a manner that reflects and upholds ATP brand, reputation, and values. Expected standards and behaviours include:

- Employees will hold paramount the safety, health and welfare of the public in the performance of professional duties and will act in such a manner as to uphold and enhance personal and professional integrity;
- Employees will treat with respect and consideration all persons, regardless of race, religion, gender, sexual orientation, maternity, marital or family status, disability, age or national origin;
- Employees will build professional reputations on the merit of services and will refrain from competing unfairly with others;
- Employees will respect the structure and responsibilities of the board of directors, provide them with facts and advice as a basis for their making policy decisions and will uphold and implement policies that are adopted by the board of directors;
- ATP as a whole will keep the community informed about issues affecting it;
- Employees will avoid any interest or activity that is in conflict with the conduct of their official duties and will respect and protect privileged information to which they have access in the course of their official duties; and
- Employees will strive for personal and professional excellence and encourage the professional developments of others.

8. ROLE REQUIREMENTS

All employees are required to perform the duties of their role to the standard required by ATP and to the best of their ability. They must follow all reasonable instructions given by those managing activities. Examples of breaching reasonable instructions include;

- Non-compliance with the ATP code of conduct and ethics;
- Non-compliance with applicable laws relating to work undertaken by ATP;
- Non-compliance with ATP policies and procedures;
- Refusing or failing to carry out any reasonable and lawful instructions from a Manager;
- Violating or causing others to violate health and safety regulations; and
- Possessing, illegal drugs or drug paraphernalia of any kind on company property.

Employees must not deliberately or carelessly do anything that will result in poor quality work which may bring ATP into disrepute.

Employees must ensure that personal business, financial and other outside interests do not conflict with their duty to ATP. Potential conflict of interests can include;

- Having a financial interest in any business transaction with ATP;
- Being in a close personal relationship with another team member if you are, or are likely to be, in a supervisor/subordinate relationship, or some other role where you can make decisions that materially affect the other team member;
- Owning or having a significant financial interest in, or other relationship with, an ATP competitor, customer or supplier; and
- Accepting gifts, entertainment or another benefit of more than a nominal value from an ATP competitor, customer or supplier.

All employees should be vigilant and immediately report any conflict of interest to their Manager, removing yourself from negotiations or deliberations involving the conflict. You may, however, state your position and answer questions when your knowledge may be of assistance to ATP.

9. CULTURE

Employees must commit to fostering a harmonious working environment, this includes;

- Always being respectful and courteous towards customers, clients, suppliers, business contacts and colleagues;
- Working collaboratively within the team; and
- Ensuring open, friendly, respectful and transparent communication with colleagues, suppliers, customers and clients.

10. APPEARANCE

All employees must present to the workplace in neat, clean and tidy attire. When working in the office, employees are expected to present in a corporate casual dress standard.

Where relevant, full responsibility for the maintenance and cleanliness of supplied uniforms will remain with the employee, including exchange of damaged uniforms.

11. PUNCTUALITY

Subject to taking authorised leave, all employees should arrive at the workplace on time and stay until the designated finishing time. Employees must also aim to be punctual when taking lunch or other breaks.

In the event that the employee has any problems impacting their hours of work on any given day, they must notify their Manager immediately. Flexible working arrangements can be requested, please refer to the [Flexible Working Arrangements Policy \(POL-008\)](#) for further information regarding eligibility and application procedure.

12. ATTENDANCE

Regular attendance is essential to the efficient workflow and productivity of ATP. Employees should refer to their employment agreement for business operational hours and their usual hours of work.

Any leave should only be taken in accordance with the ATP Leave Policy. During prolonged unplanned absence, employees should contact their Manager on a regular basis to provide updates to the status of their return.

Where an employee finds that they cannot return to work as scheduled, they must notify their Manager as soon as possible. Repeated late attendance or absence from work without valid reason may result in disciplinary action.

13. APPOINTMENTS

Employees should endeavour to arrange medical appointments outside normal working hours, where possible.

If an employee needs to take time off for medical appointments during working hours, they first need to make arrangements with their Manager – except in emergencies, when the employee (or another person) should advise their Manager as soon as possible.

ATP may request time is deducted from an employee's personal/carer's leave entitlement during any time that the employee takes to attend medical appointments during working hours.

14. UNAUTHORISED ABSENCE

If an employee does not come to work at the appropriate time, and their absence is not authorised by their Manager or otherwise covered by other provisions of the policies, then ATP will treat the employee as being absent without permission. Employees may not be paid when they are absent without permission or approval.

15. ABANDONMENT OF EMPLOYMENT

Employees are generally considered to have abandoned their employment if they are absent from their employment continuously for three (3) working days without notification or ATP consent. In the even this occurs, relevant steps will be taken in line with ATP's Leave Policy.

16. OCCUPATIONAL HEALTH SAFETY AND ENVIRONMENT

ATP is committed to maintaining a safe workplace for all our employees. Employees must work in a safe, responsible and effective manner that ensures not only their own safety but the safety of others.

Employees must report any injury or accident, no matter how minor to their Manager immediately. Please refer to ATP Occupational Health, Safety and Environment Policy (POL-0004) for more information.

17. FITNESS FOR WORK

All employees must not report to or be at work unfit or under the influence of drugs, alcohol or any other substances, or when on any prescribed medication that may affect their ability to work safely.

18. BULLYING, HARASSMENT, SEXUAL HARASSMENT AND DISCRIMINATION

All employees must maintain a work environment free from discrimination, harassment, workplace bullying and victimisation. Please refer to [EEO & Workplace Diversity Policy \(POL-009\)](#) for further details.

19. PROPERTY & SECURITY

Employees are responsible for all ATP property, equipment (including vehicles, laptops and mobile phones, etc.), materials, or written information issued to them, or in their possession or control.

Employees agree to take all reasonable steps to:

- Maintain in good condition all ATP equipment and property;
- Ensure that all reasonable steps are taken to prevent loss or theft;
- Comply with all applicable security regulations;
- Immediately report any loss or damage to ATP property to their Manager; and
- Properly secure the office if last to leave the premises.

Employees must not:

- Remove ATP property or equipment from the Company / Business premises or any other place of work; or
- Use any ATP property, equipment or materials for any purposes other than business related purposes, without first getting permission from their Manager.

Any ATP equipment or property must be returned on or before the employee's last day of employment.

20. CONFIDENTIALITY

All employees must maintain confidentiality regarding business and client information collected and used in the course of their work.

Confidential information includes any confidential information relating to ATP that comes to an employee's knowledge and is not in the public domain and includes:

- any information disclosed to an employee by or on behalf of ATP or any client of ATP;
- any information which comes into an employee's possession, or is generated by an employee, in the course of employment, whether or not the information was originally supplied by ATP;
- any information relating to the dealings, financial arrangements, transactions, general affairs, financial position of ATP and other matters that do or may affect the financial position or reputation of ATP;
- any information relating to ATP internal management, the structure of the business of ATP, ATP employees, policies, strategies, market intelligence, plans, investments or aspects of its future operations;
- any Intellectual Property belonging to ATP;
- any details of your employment or employment contract; and
- any other information ATP considers to be confidential.

Employees must:

- not divulge or communicate to any person, any confidential information except so far as may be reasonably necessary for the proper performance of their duties; and
- take all reasonable precautions, including physical security, as may be reasonably necessary to maintain the confidentiality of confidential information; and
- immediately notify a Manager of any suspected or actual unauthorised use, copying or disclosure of confidential information.

21. INTELLECTUAL PROPERTY

Intellectual property means all intellectual property and proprietary rights (whether registered or unregistered) that are owned or used by ATP or necessary for the conduct of ATP business including:

- any ATP confidential information; and
- any patents, copyright (including all copyright software), registered designs, trademarks, rights to have information kept confidential, processes, inventions, improvements, innovations, modifications and discoveries, whether or not capable of being secured, registered or protected by any means.

Employees must deliver to ATP full particulars concerning the realisation or creation or arising from the development of any new Intellectual Property.

Employees must, with the approval of, and at the expense of ATP, execute all documents and undertake all such acts, matters and things as may be reasonably necessary to obtain registration or other legal protection of the Intellectual Property on behalf of ATP and to give effect to the assignment above.

Employees must maintain dated, legible records of all work performed in the study, assessment or development of the Intellectual Property and acknowledge that all such records are the property of ATP.

22. CONSEQUENCES OF BREACH OF THIS POLICY

ATP will review any alleged breach of this procedure on a case by case basis. Employees who fail to comply with this procedure may face disciplinary action. In serious cases, termination of employment may occur.

23. REVIEW

This policy and its implementation will be reviewed on an ongoing basis in terms of its suitability and effectiveness. Internal control systems and procedures will be audited regularly to ensure that they are effective in minimising the risk of non-compliance with this policy.

This policy shall be reviewed annually to ensure that it remains current and relevant to ATP standards of practice.

All employees are required to understand and comply with this policy and to follow the requirements set out in this policy.

24. RELATED DOCUMENTS

Leave Policy (POL-0003)

Occupational Health, Safety and Environment Policy (POL-0004)

Flexible Working Arrangements Policy (POL-0008)