



CODE OF CONDUCT POLICY

Purpose

To provide all employees with simple guidelines on what behaviour is expected of them and what behaviour is considered unacceptable.

Scope

The principles apply to all employees and consulting or contracting personnel supplying a service to Lucas.

Principles

Failure to comply with principles of the LUCAS CODE OF CONDUCT will result in an employee being disciplined or possibly dismissed. A contractor or consulting service may be terminated immediately for non compliance.

General community and common law standards of behaviour will apply, in conjunction with the following indicative examples:

EXAMPLES OF ACCEPTABLE BEHAVIOUR:

- Carry out work in a safe, conscientious and effective manner to an acceptable standard;
- Comply with all relevant Company & site policies, procedures and relevant statutory regulations;
- Treat fellow employees, customers, suppliers and other contactors in a cooperative, fair, dignified and open manner;
- Comply with all lawful and safe instructions from your immediate manager/supervisor and other personnel associated with a contract or project;
- Report any incident or near miss you observe or are involved in;
- Present to work punctually and dressed as per appropriate site specific requirements; and
- Be courteous to members of the public and promptly respond to any complaints.

EXAMPLES OF UNACCEPTABLE BEHAVIOUR:

- Violence, harassment or abuse in any form whatsoever shown towards fellow employees, clients or anyone else related to work with the Company;
- Acts of incitement or actual acts of discrimination or harassment on the grounds of sex, marital status, disability, age, religious or political beliefs, race or national or ethnic origin;
- Damage caused by an employee to Company property found to be the result of gross negligence or intentionally caused by the employee;
- Disregard for Company policy, rules or the welfare of fellow workers or customers;
- Distribution of company records or data in an unapproved manner;
- Any activity bringing disrepute to the Company or its other employees;

- Unlawful behaviour which causes detriment to the Company;
- Theft;
- Wilful disobedience or misconduct;
- Refusal or neglect of duty;
- Insubordination;
- Concealment of material fact on engagement;
- Obscenity;
- Conviction for an offence which renders the employee completely unable to work;
- Falsifying information in any personal record, including time or wages records, or the lodgement of a false Workers Compensation claim;
- Possession, use, or dealing in any prohibited drug or other restricted or dangerous substance during working hours or on Company premises;
- Disclosure to other persons of information relating to Company security arrangements;
- Duplication of company keys without permission from a Company Director or Manager;
- Client refusal to allow employee to return to site and/or to continue working on the Project; and
- Discredit or disparage Lucas or any of its companies, operations or personnel.

In the event an employee is witness to improper conduct included but not limited to those outlined in the Examples of Unacceptable Behaviour above, the employee can report a complaint to either the HR Team and/or Senior Management. This employee will be protected and any information presented will be treated confidentially (Whistleblowing).

This document is subject to periodic review and change. Every effort will be made to inform employees of any amendments to the Code of Conduct; however it is the employees' responsibility to keep up to date with any updates or additions to the Code of Conduct.

All employees, contractors and visitors are responsible for compliance with this policy within their area of operation.



Phil Arnall
Chairman
AJ LUCAS GROUP LIMITED
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