

Code of Conduct & Acceptance Form

Policy Owner	Human Resources
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Code of Conduct Policy

Purpose

We value our People at Wilson and acknowledge that it is their commitment, skill, results and general contribution that combine to achieve our business strategy, operational goals and customer satisfaction.

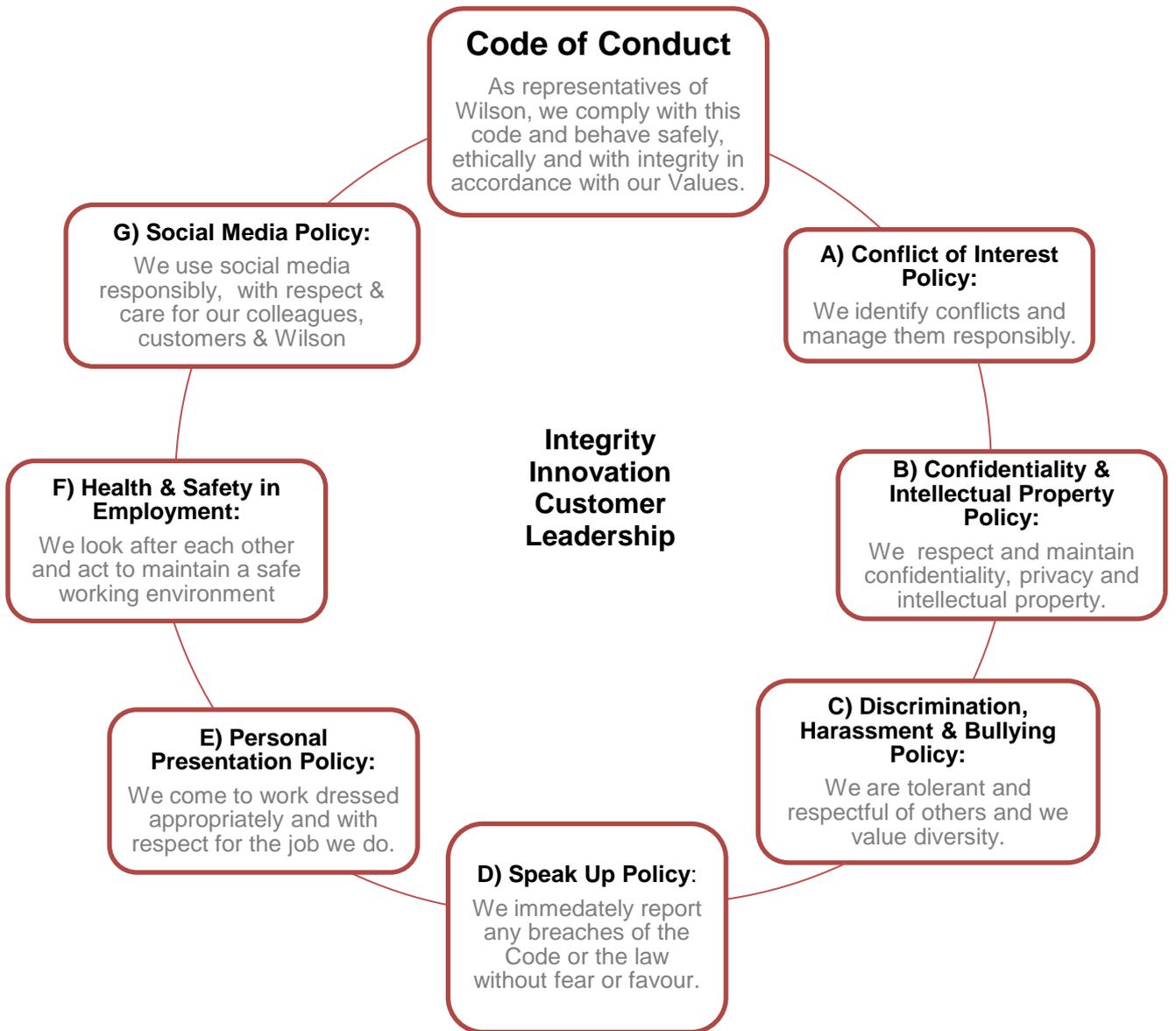
We firmly believe that it is not just *what* we do, but also *how* we work together to achieve results that makes the Wilson difference. Our Code of Conduct describes the expectations we have of all of our People, underscored by our Values of **Integrity, Innovation, Customer** and **Leadership**.

Our Code of Conduct Framework sets the standards for the way we work and, when read as a whole, provides relevant guiding principles for helping us all make well-judged decisions in our day-to-day work. The Framework also provides clear behavioural expectations so that everyone can work in a productive and considerate environment.

Code of Conduct Framework

What is included in our Code of Conduct Framework?

Our Code of Conduct Framework explains the way we are expected to behave and work together, in accordance with our Values, to achieve a tolerant, ethical, fair and consistent workplace culture. The Framework also comprises of a range of Policies that outline the standards of conduct and expectations we have of our People that, together, form our overarching Code of Conduct. The Policies that form our Code of Conduct Framework are shown in the diagram below. Each provides specific guidance and information about the obligations in each of the areas covered, which may from time to time be amended, or be added to as circumstances change.



Scope

Who Is covered by the Code of Conduct?

Our Code of Conduct Framework applies to employees across Australia and to the extent relevant, to all consultants and contractors who have been engaged to provide services to Wilson and our related companies. This includes employees who may be covered by an Award or enterprise agreement.

When does the Code of Conduct apply?

The application of our Code of Conduct is not limited to the workplace or standard working hours. Our expectations for how our People behave and conduct themselves extend to any work-related context including work travel; attending external events such as conferences or training; work functions or parties; and when entertaining clients, providers or customers.

Policy

Complying with our Code of Conduct Policy and Framework is a requirement of ongoing employment or engagement with Wilson. All individuals must read and understand our Code of Conduct Framework and must sign the **Code of Conduct Acknowledgement & Acceptance Form** (attached at the end of this Policy at Appendix A) as and when required.

We take our Code of Conduct very seriously. Disciplinary action, up to and including termination of employment or engagement, may be taken against any person found to be in breach of one or more of the policies that make up our Code of Conduct Framework.

All individuals are encouraged and expected to report any actual or suspected incidence of corrupt, illegal or unethical conduct or behaviour so that the matter can be investigated. Wilson is committed to treating reports seriously and with sensitivity and will treat such issues as confidential as so far as possible to fully investigate the situation. Wilson is also committed to cooperating with any agency or government department which may be conducting investigations as part of a lawful process.

Corporate Governance

Good Corporate Governance is a natural and important part of our Code of Conduct Policy. Wilson is committed to delivering compliant corporate governance in all areas of our business practice in order to compete globally and to maintain and promote our stable and ethical reputation in the marketplace and industry sectors we operate in.

In all activities and decisions made by Wilson, its Officers must abide by the requirements of the applicable corporations-related legislation and any amendments made to it from time to time.

Corporate Governance Principles

The following underlying principles are used to guide our approach to doing business and will be represented to both internal and external stakeholders through our actions and communications. It is our intention to maintain and fulfil our clients' requirements and expectations while, at the same time, sustaining profitability on behalf of our Shareholder. Led by the Board, Executive Team and Senior Management, we are committed to:

- communicating clearly the roles and responsibilities of the Board and Management with all relevant stakeholders;
- facilitating and maintaining an appropriately qualified Board and Senior Executive team, both in experience and dimension, which will reflect coverage of matters which fall under its accountability and direction;
- demonstrating ethical and responsible decision-making in our activities;
- providing credible and transparent financial reporting which is independently audited and verified;
- providing and promoting disclosure of material matters relating to our operations (as required by Law) in a timely and balanced manner;
- demonstrating respect and acceptance of our Shareholder's wishes and instructions, facilitating the effective exercise of those instructions;
- developing and maintaining sound systems for risk identification, minimisation and control;
- providing a fair, structured and quantified approach to remuneration, recognition and individual reward;
- promoting practices which facilitate enhanced performance and effectiveness on behalf of the Board and the management team at all levels; and
- respecting and supporting the legal and related (legitimate) interests of stakeholders.

We are also committed to ensuring that relevant procedures are implemented where applicable to enable all business units to support these principles, accompanied by supporting information to Wilson representatives where necessary.

All employees are required to support and make a positive contribution towards our commitments to good corporate governance by ensuring that their actions are aligned with the principles outlined above and that they adhere to our Code of Conduct. In activities at branch and operational levels, agreed service standards and our Code of Conduct Framework will form the minimum acceptable standard of service and delivery.

Responsibilities

All Employees: are responsible for familiarising themselves and complying with our Code of Conduct Framework.

As a part of conducting ourselves professionally, all individuals are expected to be responsible in the use of company and customer property and resources by:

- Only using them in an authorised manner for which they are intended and never for personal or illegal purposes;
- Treating the Wilson and customer resources/property with care and respect;
- Taking care to prevent loss, damage, misuse or theft of Wilson and customer assets;
- Notifying your manager if you become aware of the misuse of Wilson or customer resources/property; and
- Never abuse, deface or wilfully damage Wilson or customer resources, property or equipment.

For more detailed information on your obligations, please see the following:

Equipment, Mobile Phone & Company Assets Policy

If you do not understand your obligations under the Code of Conduct, please speak to your manager or a member of the People Capability Team.

Values and Behaviours

Wilson Values

Our Values provide a set of core behaviours that are the minimum expectation required of all. They describe the essence of what we believe to be important in the way we conduct ourselves with our colleagues and with our customers, visitors, contractors, suppliers and other stakeholders. In complying with our Code of Conduct, you are expected to adhere to the following standards of behaviour:

Our Values	Our Behaviours	Behaviours that reinforce	Behaviours that undermine
<p>Integrity <i>Do what's right, not what's easy</i></p> <p>We do what we say we will do and deliver on our promises.</p>	<ul style="list-style-type: none"> • Act with courtesy, honesty and openness at all times • Make decisions in a thoughtful and ethical manner • Work in accordance with Wilson policies, acting in the best interests of Wilson and our customers • Maintain and provide accurate, complete and true records • Do not use Wilson's time, assets, business opportunities or contacts for your personal interest or gain 	<ul style="list-style-type: none"> • Lead by example • Transparency • Accountability • Consistency • Doing the right thing when no one is watching • Display mutual respect • Supportive & Understanding • Calls out compromising behaviour • Acts appropriately under pressure 	<ul style="list-style-type: none"> • Lack of accountability • Self-preservation • Turns a blind eye • Dishonesty • Inconsistency • Justifies compromising behaviours • Self interest • Disparagement • Sense of entitlement • Secrecy
<p>Innovation <i>Change that adds value</i></p> <p>We support new ways of thinking and working.</p>	<ul style="list-style-type: none"> • Demonstrate that you are keen to learn and try new ways of working • Act to improve processes at every opportunity, challenging the status quo constructively • Share and build on ideas and suggestions and accept change with an open mind 	<ul style="list-style-type: none"> • Encourage creativity • Constructive actions • Collaboration • Communication • Curiosity • Long term view • Challenge with positive intent • Open Mindedness • Out of the box thinking • Agile • Receptive to change 	<ul style="list-style-type: none"> • Avoid risk taking • Negativity • Complacency • My way or the highway • Conservatism • Fear of the unknown • Narrow mindedness • Stagnant • Lack of investment • Risk averse • Short Sighted

<p>Customer <i>Every customer counts</i></p> <p>Build trusted relationships with internal and external customers.</p>	<ul style="list-style-type: none"> • Demonstrate courtesy, co-operation and respect in all dealings with internal & external customers, visitors, contractors, suppliers and other external stakeholders • Listen to our customers and provide relevant and sustainable solutions • Aim to delight our customers by going the extra mile to exceed their expectations 	<ul style="list-style-type: none"> • Active listening • Builds Trusting Relationships • Good Communication • Proactively engage • Transparency • Understanding • Consistent • Responsive • Follow through - Deliver on promises 	<ul style="list-style-type: none"> • Non-responsive • Lack of respect and empathy • Inflexible • Lack of follow up • Complacency - Taking customers for granted • Lack of urgency • Deceptive/Dishonest • Disrespectful • Lack of engagement • Ignoring customers
<p>Leadership <i>Demonstrating leadership is every person's responsibility</i></p> <p>The wellbeing of our people, our customers and our community guide our decisions.</p>	<ul style="list-style-type: none"> • Place a high priority on team and organisational goals, constantly looking to add value and achieve results • Take responsibility, seeking and acting on feedback • Demonstrate leadership with courage & creativity (this can be leadership of people or leadership within your field of expertise) • Lead by example in everything you do • Consider the health, safety and wellbeing of co-workers in our work activities. 	<ul style="list-style-type: none"> • Clear vision & direction • Collaborative • Consistent • Empowering • Leads by Example • Accountable • Supportive & Inclusive • Honest • Genuine/Authentic • Strong Communicator • Not afraid to make hard decisions • Transparency 	<ul style="list-style-type: none"> • Inconsistent • Complacent • Dishonest • Indecisive • Bad Listener • Lack of communication • Lack of transparency • Unaccountable • Double standards • Lack of alignment • Managing not leading • Favouritism

Conflict of Interest & Declaration Procedure

Under our Conflict of Interest (COI) Policy, all of our People are required to put the duties and responsibilities of their job and employment or engagement with Wilson above their own private interests when carrying out their work-related duties and responsibilities.

The COI Policy sets out those obligations and the responsibilities all Wilson People have with regard to giving and receiving gratuities and gifts as well as dealing with actual or potential conflicts of interest, including offering and being offered inducements or bribes.

All of our People are required to declare or report any COI they may have or suspect another person may have.

Declarations are important because they enable Wilson to consider the COI and reach a determination regarding an appropriate course of action

For more detailed information on your obligations, please see the following:

- **Conflict of Interest Policy & Declaration Procedure**

Confidentiality and Intellectual Property

In order to maintain our reputation and to protect our People and the companies we work with, Wilson is committed to maintaining the privacy, confidentiality and security of information that is in our possession, including intellectual property such as, but not limited to, designs, know-how, trade secrets and inventions.

In our broad business dealings we are trusted with private information, such as our employee and contractor details, and confidential information, such as customer files and commercial information.

To ensure we maintain our commercial interests and good reputation, all of individuals are expected to:

- Follow procedures and requirements for keeping information, passwords, access passes secure
- Do everything possible to keep information secure and not share information with anyone who does not need it to perform their work
- Ensure customer security, Privacy or confidentiality procedures and requirements are maintained

For more detailed information on your obligations, please see the following Code of Conduct Policy:

- **Confidentiality & Intellectual Property Policy**

Discrimination, Harassment and Bullying

Wilson values diversity because it not only creates a rich and vibrant atmosphere at work, but because it also brings ideas and different ways of thinking into the workplace.

We are therefore committed to:

- achieving a diverse workforce that is inclusive and respectful;
- providing a work environment that is free from discrimination, harassment, bullying and victimisation;
- making employment decisions based on merit and not on irrelevant attributes;
- promoting a safe working environment free from bullying; and
- not treating a person unfavourably because they have raised a genuine complaint about unacceptable behaviour.

Unlawful discrimination, harassment, bullying or victimisation are unacceptable and will not be tolerated.

For more detailed information on your obligations, please see the following:

- **Discrimination, Harassment & Bullying Policy & Complaints Procedure**

Speak Up Policy

Wilson is committed to creating and maintaining high standards of corporate governance and ethical conduct across all of our businesses and locations globally.

Our Speak Up Policy is in place to encourage the reporting of any concerns regarding actual or suspected illegal, unethical or unacceptable conduct, collectively called **Improper Conduct**.

Wilson's attitude is **"when in doubt: report it"**.

A person who has knowingly made a false report may be subject to disciplinary action up to and including termination of their employment or engagement.

For more detailed information and procedures about "whistleblowing" and reporting, please see the:

- **Speak Up Policy**

Personal Presentation Standards

The way we present ourselves for work communicates our professionalism and respect for our job, each other and our customers.

Where it is a Wilson requirement of the job to wear a uniform, including any time you may be directed to wear a uniform, it is a requirement that you attend work in company uniform. Where supplied, name badges must be worn whilst in contact with the public. All Wilson People are otherwise expected to attend the workplace, including offsite meetings, in neat business attire, appropriate for the position you have been engaged to undertake. It is also expected that you will maintain a high standard of neat and professional grooming at all times.

For more detailed information on your obligations, please see the:

- **Personal Presentation Policy**

Health and Safety in Employment

We all have a responsibility to conduct ourselves appropriately in order to maintain a safe working environment. All of our People are expected to play their part by complying with Wilson's Health, Safety and Wellbeing policies. Broadly, we expect that all individuals will:

- Take care of their own health and safety and that of others;
- Report hazards, incidents or accidents and stop or don't start any work which appears to be unsafe;
- Wear the specified footwear, clothing and personal protective equipment required for your job, without exception;

- Never come to work under the influence of alcohol or drugs and ensure they have read and understand the Wilson Drugs and Alcohol Policy;
- Never bring weapons of any kind to work (unless required as part of your employment and approved by Wilson); and
- Abide by all safety rules and procedures operating within the company and comply with all relevant health and safety policies and legislation.

All Health, Safety & Wellbeing Policies are available on the intranet and provide more detailed information.

Social Media Policy

Social media is used widely and is easily accessible at any time of the day or night. Because of this, it can be difficult to understand boundaries and what is acceptable when it comes to personal usage and your obligations to your employment or engagement with Wilson and your personal, legal restrictions.

Our Social Media Policy therefore aims to inform our People of the acceptable standards of use as they engage in conversations or interactions using social media for business or personal use, aligned with our Values of **Integrity, Innovation, Customer** and **Leadership**.

To protect you, Wilson and our business stakeholders/customers, individuals are not permitted to use social media to publish or comment on: any Wilson-related activity; or make any disparaging comment about any Wilson People; or any of Wilson's business stakeholders, including customers; or any Wilson product or service; or to use the Wilson name, brand, or logo from any business unit (i.e. entity) at any time. Only employees who have specific, written authorisation from Wilson may use social media for business use and only within the parameters of that written authorisation.

All of our People are responsible for familiarising themselves with and complying with our Social Media Policy.

For more detailed information, please see the:

- **Social Media Policy**

Additional Information

Where to go if you have questions

If you find yourself in a situation where you are unsure about how to behave or present yourself or you would like further information about any of our Code of Conduct Policies or our Values, please feel free to speak to your Manager or a member of Wilson's Human Resources Team

Policy Review

This Policy is maintained by Wilson's Human Resources Team and may be revised from time to time based on legislative requirements and to ensure relevance to our business operations. It does not form part of an individual's contract of employment or engagement.

You are welcome to contact humanresources@wilsongroupau.com with any suggestions, feedback or questions.

Appendix A: Code of Conduct Acknowledgement & Acceptance Form

Before signing this form, you are expected and encouraged to read the associated policies that make up our Code of Conduct Framework, which include:

- Conflict of Interest Policy;
- Confidentiality & Intellectual Property Policy;
- Discrimination, Harassment & Bullying Policy & Complaints Procedure;
- Speak Up Policy;
- Personal Presentation Policy;
- Social Media Policy;
- Work Health Safety & Environment (WHSE) Policy;
- Equipment, Mobile Phone & Company Assets Policy;

If you have any questions about any of these policies, please seek the advice of your manager/supervisor, or speak to a member of the Human Resources team.

Acceptance:

I, (print name) _____, acknowledge that I have been provided with the opportunity to read the Wilson Code of Conduct.

I acknowledge and accept that I will work in accordance with the Wilson Code of Conduct and comply with the Code and the associated policies and procedures.

Signature:

Date:

Please return this completed form to the Human Resources Team either by hand or scan and email to humanresources@wilsongroupau.com

A copy of this form will be stored in your personnel file.