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Corporate Social Responsibility and Code of Conduct Policy

Purpose

The purpose of this Policy is to provide a framework for Workforce Participants to support the organisation's commitment to Corporate Social Responsibility and outline the organisation's standards with regards to Code of Conduct with interested stakeholders during the course of day to day business operations.

Commencement

This Corporate Social Responsibility and Code of Conduct Policy will commence on 11 January 2017 and replaces all other CRS and Code of Conduct Policies (whether written or not).

Scope

This Policy applies to **Workforce Participants** defined as:

- Managing Director
- Managers
- Staff (Permanent, Part-time and Casual)
- Contractors
- Subcontractors
- Suppliers
- Job Seekers
- Clients, agents and their representatives

This Policy and Procedure does not form part of any contract between an employee and the organisation, nor does it form part of any other Workplace Participant's Contract for Services.

Organisation refers to New Start Australia Pty Ltd.

Policy Statement

This Policy applies to Workforce Participants and aims to achieve the following objectives:

- Provide clear standards for corporate governance in all areas of operations to support encourage and support accountability and transparency
- Ethical and responsible conduct in all areas of business operations to support fair competition
- Identify key stakeholders that are impacted by New Start's activities
- Commitment to working with stakeholders to identify CSR and sustainability risks and opportunities to continually improve
- Set objectives and targets for CSR and sustainability practices
- Participate in internal and external reviews and audits to ensure CSR Policy compliance and support continuous improvement
- Continue to develop ways to adopt and promote CSR through visible activity in the community
- Maintaining high standards of social, environment and regulatory responsibility

Ethical Standards

New Start's core activities centre on the provision of human resources to Clients and Host Employers. To this end, New Start is committed to maintaining the highest ethical standards in delivering a skilled, competent and experienced workforce to its Clients.

New Start has adopted a Code of Conduct, which sets out the expectations placed on Workforce Participants in their business dealings. The Code of Conduct requires high standards of personal integrity and honesty in all dealings, a respect for the privacy of Clients and others and observance of the law.

All Workforce Participants are responsible for taking appropriate action in proven cases of illegal behaviours or behaviour outside of the spirit of this Code of Conduct.

All concerns or reports regarding any impropriety or breaches of the Code will be dealt with confidentially. The Code is regularly reviewed by the Managing Director of New Start to ensure its continued relevance to contemporary conditions.

Code of Conduct

New Start's Code of Conduct is based upon ethical common sense and is not a legal document. It is designed to let everyone know the values that should guide him or her in their daily business activities.

New Start's reputation for honesty, integrity, excellence and fairness is one of its most important assets, and the highest standards should govern all actions. Decisions made within New Start should honour the spirit and the letter of applicable laws. To this end, everyone will be honest and ethical in all his or her business dealings.

Conflicts of Interest

Managing Director

In addition to any legal obligations, for example, under the Corporations Law, Directors of New Start are required to disclose details of any contract or other interest involving New Start in which they have a material personal interest. They should not allow themselves to become involved in situations or arrangements which could give rise to conflicts of interest, irrespective of whether they are conducted on a so-called arms-length basis.

Employees

A conflict of interest exists where loyalties are divided, and the interest of a private individual interferes with the interests of New Start as a whole.



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It is expected that New Start will guard against any possibility of conflict of interest.

Examples of situations where conflicts of interest have the potential to arise include:

- Purchasing practices
- Engagement of consultants
- Outside employment
- Interest in an entity providing recruitment, labour hire or indigenous services
- Giving and receiving gifts, prizes and hospitality

Responsibility to Shareholders

New Start is committed to delivering shareholder value by managing resources at its disposal in the best way possible to achieve the most desirable outcome. Whilst maximising the dollar value of New Start is of utmost importance, New Start also considers that human, social, and natural assets are also of great importance. New Start complies with Accounting Standards, other authoritative pronouncements of the Australian Accounting Standards Board, and the Corporations Act.

Responsibility to Clients

New Start is committed to providing excellent service and value for money to its Clients whilst at the same time adhering to safety standards. New Start recognises that providing excellent customer service is critical to its success, and all staff are trained to help them attain the level of excellence required.

Personal Responsibility

New Start is committed to being honest, behaving with integrity and providing high quality human resources to its Clients.

This can only be achieved through New Start's people. In particular, employees should deal fairly and honestly with Clients, each other, business suppliers and competitors. For this to happen, the obligations and responsibilities must fall equally on New Start and its employees.

Employees will:

- Treat Clients, the public, suppliers, competitors and fellow employees with honesty, courtesy and respect
- Respect and safeguard the property of Clients, New Start and fellow workers
- Maintain the confidentiality of all Clients, New Start and other parties' information gained through work
- Perform all duties to the best of their abilities taking into account their skills, experience, qualifications and position
- Perform their jobs in a safe, responsible and effective manner
- Ensure their personal business and financial interests do not conflict with their duty to New Start policies and rules
- Maintain a work environment free of unlawful discrimination and
- Obey the law

Managers will:

- Respect every employee's rights, dignity, freedom and individual needs
- Provide a working environment that is safe, challenging and rewarding
- Recognise the work of each of their employees
- Reinforce New Start's commitment to the highest standards in business and professional ethics
- Uphold the principles of equal opportunity; and
- Obey the law

Corporate Responsibility

New Start prevents its Director's, senior managers and employees from taking advantage of New Start property, information or using their position for personal gain or to compete with New Start. New Start acknowledges that personal information is sensitive. The secure transfer, storage and disposal of personal information are paramount to protecting and maintain privacy. New Start is committed to ethical and appropriate practices to maintain the expectations of the community for the security, privacy and integrity of personal information. New Start is committed to ensuring that any complaints are dealt with efficiently and effectively.

Confidentiality

All information relating to New Start's business obtained by Directors, Senior Managers and employees in the course of performing their job role is to be considered confidential unless New Start has officially made the information public. The confidentiality and privacy of New Start's business information must be maintained and protected from any disclosure. To ensure commercial information is kept confidential, all Directors, senior Managers and employees are required to exercise care to reduce the likelihood of unauthorised disclosures of information.

For example:

- Documents should be properly safeguarded at all times, whether on Company premises or otherwise
- Confidential information should be appropriately designated and, where it is in New Start's interest to disclose it to a third party, the party should be required to enter into a confidentiality and non-disclosure agreement. Records should be maintained of who has been given such information

Bribes, Pay-Offs or Kick-Backs

No bribes, pay-offs, kick-backs or other considerations will be paid or received directly or indirectly by any Director or employee.



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Dealing with Suppliers of Goods and Services

New Start business is awarded to suppliers on the basis of suitability, quality and price. Each employee involved in the buying of goods and services for New Start must avoid any relationship, financial or otherwise, with suppliers that could easily be seen as unfairly influencing judgement.

Environment

New Start is committed to sound and responsible environmental practices and to full compliance with all environmental laws and requirements. New Start seeks to observe environmental best practice and relies on its employees to be responsible for maintaining and respecting the environment. Examples of offences include air, water, noise and land pollution, failing to comply with environmental approvals, and acting without consent. New Start has an environmental policy that directs employee and management responsibilities in respect of the environment.

Fair Competition

Fair competition means that employees will:

- Know and follow New Start's legal obligations to its competitors
- Compete on the basis of customer service, quality and value for money rather than obstructing competitive conduct
- Only use New Start's strength in a particular market in legitimate ways

Employees will not:

- Unfairly discriminate between Clients when supply staff
- Refuse to deal with, or discriminate against a Client for any improper reason
- Intimidate or threaten another person or organisation

New Start aims to conduct business fairly, and to compete solely on the merits of its service offerings. In all dealings with others, employees will be courteous, well-informed and truthful, and will be careful not to misrepresent the quality, features or availability of New Start's services.

Competitive competition will be obtained only by ethical means – covert attempts to gain competitive information is not permitted.

Gifts, Prizes and Hospitality

Giving and receiving of tokens of esteem to/from outside third parties as well as the provision and acceptance of hospitality are part of the normal business practice. However, there are times when this is not acceptable. New Start has clear guidelines for giving and receiving gifts, prizes and hospitality so that there can be no suggestion that they constitute bribery or secret commissions or in any way compromise New Start or its' business associates.

Grievance Handling

New Start aims to foster good relations amongst employees and between employees and management. New Start acknowledges that job satisfaction is reflected in how well

you relate to your colleagues, clients and suppliers. New Start also acknowledges that problems can arise at work that may sometimes cause employees to feel aggrieved. These problems can arise from the behaviour or decisions of management or other employees. New Start has Grievance Handling Policy to allow such grievances to be addressed in a timely and confidential manner.

Harassment and/or Bullying

New Start is committed to providing a work environment that is pleasant for employees to work in and conducive to good workplace relations. Harassment or bullying of any person on any basis will not be tolerated.

This requires the avoidance of unwelcome behaviour that is based on an attribute such as sex, race, disability, age, pregnancy, marital status or sexuality and offends, humiliates or intimidates the person being harassed.

Bullying includes physical abuse or psychological abuse. New Start has EEO and Anti-Discrimination and Anti-Bullying Policy that outlines the procedures to be followed in these circumstances.

Improper Influence

No pressure is to be put on any employee to influence their personal preferences in private or political matters.

Further, no approval or disapproval should be shown by anyone in their role, of an employee's private or political preferences or activities.

Intellectual Property

An employee must notify New Start of all inventions, discoveries, improvements or other forms of intellectual property made by the employee during their employment. All intellectual property in connection with the business of New Start shall belong to and be the absolute property of New Start with no compensation being due to the employee in respect of the intellectual property.

Non-Discrimination

Management is committed to equal opportunity for all its employees. Employees must not discriminate against any person on the basis of race, colour, religion, gender, age, marital status, sexual preference, disability, or other factors. Recruitment promotion will be based on merit. Merit concerns the ability to perform the job and is independent of group membership.

Conditions of employment and career development will be applied to all employees, in a non-discriminatory manner. New Start has an Anti-Discrimination, EEO and Anti-Bullying Policy which must be observed by all employees.



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Workplace Health and Safety

New Start is committed to providing a safe and healthy environment for all employees. New Start's policy is to make every reasonable effort to prevent accidents, protect employees from injury, and promote the health, safety and welfare of all employees.

New Start will make appropriate resources available to ensure that it complies in all respects with relevant WHS legislation and codes of practice.
New Start has a Workplace Health and safety Policy which outlines objectives and responsibilities.

Policy Information

Accountable Officer: Managing Director
Policy Type: Human Resources
Related Policies:

Daniel Phillips
Managing Director
New Start Australia Pty Ltd
Dated February 2018

Variations

The Organisation reserves the right to vary, replace or terminate this Policy from time to time.

Failure to Comply with the Policy

Where it is established that a Workforce Participant has breached this Policy, they be subject to disciplinary action, up to and including termination of employment or Contract.

Questions about this Policy

Should you have any questions about this Policy, please contact the Human Resources Department.

Workforce Participant Declaration

I have read this Policy and Procedure. Any questions I have raised, have been answered to my satisfaction. I thereby agree to adhere to this Policy at all times during my employment with the Company.

Print Name	
Signature	
Date	