

Code of Conduct Policy

Our commitment

Romann Logistics is committed to ethical conduct and compliance with our legal obligations in everything we do.

How we will meet our commitment

Our Code of Conduct Policy sets out the standard of behaviour expected of all workers. It is based on the values that guide our decisions, behaviours and actions.

Our values include:

- respect
- honesty
- integrity
- openness
- impartiality
- fairness
- collaboration
- diversity
- equality
- accountability
- dependability
- social responsibility

Our decisions, behaviours and actions must reflect these values at all times.

Our objectives are to:

- embed our values in everything we do

- provide a framework for appropriate behaviour that enables workers to reflect our values in their decisions, behaviours and actions
- provide a disciplinary process to be followed if the Code of Conduct Policy is breached

To this end we have implemented this Code of Conduct Policy and supporting Employee Misconduct Procedure. The Code of Conduct Policy does not encompass all possible scenarios that may arise; instead it provides a set of values to guide workers on acceptable and unacceptable behaviour. Any breaches of the Code of Conduct Policy will be subject to the disciplinary process set out in the Employee Misconduct Procedure.

Scope

This policy and supporting procedures apply to the decisions, behaviours and actions of all workers both in the workplace and in any work-related context (e.g. work social functions, conferences, business trips).

Responsibilities

Romann Logistics has identified the following roles within our organisation with obligations under the Code of Conduct, as:

- the employer/ person conducting a business or undertaking (PCBU)
- managers/supervisors
- workers

A summary of the key responsibilities for each role are listed below.

Employer/PCBU Responsibilities

The Employer or PCBU can be a sole trader, the partners in a partnership, a company, an unincorporated association or a government department. In our organisation this responsibility is accepted by the Director(s).

The Employer/PCBU must:

- ensure all workers are aware of their obligations under the Code of Conduct
- encourage workers to reflect the values in all decisions, behaviours and actions
- review and audit the Code of Conduct on an ongoing basis to ensure it continues to reflect good practice and compliance with the relevant legislation

Manager/Supervisor Responsibilities

Managers and supervisors are workers who have an area of control within the workplace. In our organisation this responsibility is accepted by the National Operations Manager, National Business Development Manager and Key Account Manager.

Managers and supervisors must:

- ensure all workers in their area of responsibility understand their obligations under the Code of Conduct (i.e. through induction program and job descriptions)
- ensure all workers in their area of responsibility reflect the values in all decisions, behaviours and actions
- document and report any non-conformance with the Code of Conduct in accordance with the Employee Misconduct Procedure
- resolve or appropriately escalate non-conformance with the Code of Conduct promptly

Worker Responsibilities

A worker is any person who carries out work for a PCBU, including work as an employee, contractor, subcontractor, self-employed person, outworker, apprentice or trainee, work experience student, employee of a labour hire company placed with a 'host employer' and volunteers.

Workers must:

- reflect the values in all decisions, behaviours and actions
- take responsibility for their own decisions, behaviours and actions in the workplace

- comply with all requirements of their relevant job description
- comply with all supporting workplace policies and procedures
- discuss with their manager if they have any doubts as to how to apply the Code of Conduct or the appropriate course of action in particular situations
- report any non-conformance with the Code of Conduct by themselves or others, using the appropriate form (e.g. Incident Report Form, Hazard Observation Form etc.)
- take part in any disciplinary process as a result of a breach of the Code of Conduct

Key areas of the Code of Conduct

The following sections summarise the requirements of the key areas of our Code of Conduct.

Policies, procedures and legislation

All workers must comply with the policies and procedures of our organisation and all relevant legislation (relevant to their duties).

Attendance and punctuality

All workers are expected to be punctual and attend the workplace during their contracted hours of employment. If a worker is unable to attend work, they must notify their manager (or other delegate) promptly and provide the reason for the absence and when they are likely to return to work.

Dress, appearance and hygiene

All workers must ensure their appearance is neat, clean and appropriate for their role when they present for work and where a uniform, personal protective equipment (PPE) or High Visibility (Hi-Viz) clothing is required, it must be clean, in good condition and worn correctly. All workers must exercise a high standard of personal hygiene at all times.

Personal behaviour

All workers must perform their role in line with the values and requirements of this Code of Practice at all times.

Use of facilities, equipment, email, phones, internet and social media

All workers must take all reasonable care when using our facilities and equipment to ensure they are used correctly and are not damaged. If equipment requires a licence, it must only be operated by a worker with the appropriate licence.

Workers may only use email, phones and the internet for work-related purposes. Email and web access logs may be monitored for compliance. Workers are not permitted to use workplace computers to access social media sites during their contracted hours of employment.

Safe and healthy work environment

All workers must follow the requirements of our Work Health and Safety Policy at all times. This policy aims to create a safe and healthy work environment for all workers and other persons at the workplace.

Licences, certifications and other requirements

All workers must possess all relevant licences, certifications and other requirements (such as the 'right to drive') relevant to their job description at the time of employment, hold them for the duration of their employment and immediately notify their manager if they are withdrawn/lost.

While there is no disciplinary issue if a licence is cancelled or suspended, it should be recognised that workers should never engage in an activity for or on our behalf, without a current valid licence for the activity being undertaken,

Where a licence is a condition of employment, it remains an ongoing condition of employment. Where a worker does not continue to hold all current valid licences for their role, we may allocate alternative duties, commence disciplinary procedures, or suspend or terminate their employment.

Confidential information, privacy and records management

All workers must ensure that private and confidential information for which they are responsible is secured against loss, misuse or unauthorised access. Workers must not access private or confidential information that they do not have authorisation to access. Workers must use private and confidential information solely for the purposes of performing their duties. All workers must adhere to correct document and record management procedures and must not damage, dispose of or interfere with official documents or files.

Ownership of products and copyright

All products, materials, copyright and intellectual property created, authored, discovered, developed or produced by the worker in the course of their employment will remain the property of the organisation. Upon termination of employment the worker will return all documents, data, information, equipment and other property belonging to the organisation that may be in the worker's possession.

Conflict of interest

All workers must notify their manager of any potential or actual conflict of interest they might have, that could adversely affect the organisation. Failure to disclose or resolve a conflict of interest may result in disciplinary procedures.

Insider trading

Workers with 'inside information' (non-public information) must not trade in shares, influence another person to trade in shares or communicate the 'inside information' to another person who may trade in shares.

Gifts, commissions, benefits, gratuities

Workers must not accept a gift, commission, benefit or gratuity from a person or organisation if the intent is to influence the worker's decisions, behaviours or actions.

Small token gifts or benefits (excluding money) may be accepted (less than AUD\$100 value) as long as there is no possibility that the worker's decisions, behaviours or actions may be perceived to be compromised.

If a worker receives a gift, commission, benefit or gratuity, they must declare it to their manager. If a worker is unsure of how to respond to a gift, commission, benefit or gratuity, then they should seek advice from their manager.

Public conduct and media contact

All workers must conduct themselves in accordance with our values and this Code of Conduct when representing the organisation in public.

Contact between workers and the media is restricted. Any workers who are authorised to make comments in a public forum on any matter relating to the organisation must do so in line with our values and this Code of Conduct. Workers must not negatively reference the organisation in any public forum (including online social media).

Bullying, harassment, discrimination, other unacceptable behaviour

Workers must not engage in any activity or behaviour that may be perceived as bullying, harassment, discrimination or other unacceptable behaviour. Any of these behaviours based on race, gender, age, religious beliefs, disability, sexual orientation or any other factor will not be tolerated and will result in disciplinary procedures.

Workers have an obligation to report any instances of bullying, harassment, discrimination or other unacceptable behaviour to their manager that they observe or are subject to.

Diversity and equal opportunity

All workers will be treated the same regardless of race, gender, age, religious beliefs, disability, sexual orientation or any other factor.

Supporting policies and procedures

This policy should be read and followed in conjunction with:

- all policies and procedures relevant to a worker's role

- the Employee Misconduct Procedure

Implementation and evaluation

Romann Logistics will ensure this Policy is reviewed and evaluated for its effectiveness in delivering policy objectives on an annual basis or earlier in the event of major changes to the legislation or our organisation structure and operations.

**Policy authorised by: George Manassa,
National Business Development Manager**

Signature: GM, digitally signed 05.04.2022

Policy issue date: 04.04.2022

Policy version number: v1

Policy review due date: 27.07.2022



I have read and agree with the policy above.

Name:

Signature:

Date:

Authorised Officer: