



# Code of Conduct

BUILDING THE FUTURE

**WITH YOU**





# Contents.

Our Code of Conduct sets a standard of behaviour throughout Decmil which guides our actions, our decisions, our performance and to which we hold ourselves accountable.



Definition and Abbreviations	3
1. Vision & Values	4
1.1 Our Guiding Principles	4
2. Introduction	5
2.1 About the Code	5
2.2 Raising a Concern / Reporting	5
3. Working together	6
3.1 Health, Safety and Environment	6
3.2 Employment Equality	6
3.3 Harassment and Bullying	7
3.4 Related Documents	7
4. Ethical Business Practices	8
4.1 Bribery and Corruption	8
4.2 Gifts and Entertainment	10
4.3 Conflicts of Interest	11
4.4 Insider Trading	11
4.5 Anti-Competitive Conduct	12
4.6 Related Documents	13
5. Use of Assets and Resources	12
5.1 Use and Protection of Personal Information	12
5.2 Financial Controls & Record Keeping	12
5.3 Protection of Assets	13
5.4 Use of Technology	14
5.5 Related Documents	14
6. Engagement with Third Parties	15
6.1 Relationship with Third Parties	15
6.2 Media, Public Disclosures	15
6.3 Sponsorship and Donations	16
6.4 Related Documents	16
7. Making Decisions – Should We?	17



# Definitions and abbreviations.



## BRIBERY

The offering, promising, giving, accepting or soliciting of an advantage as an inducement for an action which is illegal, unethical or a breach of trust.

## CLOSED PERIOD

The period from the end of the financial year or half financial year until the release of the corresponding financial results.

## CORRUPTION

Dishonest activity in which a director, executive, manager, employee or contractor of an entity acts contrary to the interests of the entity and abuses his/her position of trust in order to receive some personal gain or advantage for him or herself or for another person or entity.

## DECMIL

Decmil Group Limited (DGL) and any subsidiary or business which is directly or indirectly wholly, or majority owned, managed, or otherwise controlled by DGL.

## ENTERTAINMENT

Any benefit where the donor is also present, provided to us by an external person or entity, or provided by us to an external person or entity in the form of meals, drinks, accommodation and/or admission to events (e.g. performances, concerts, exhibitions and sporting events).

## EXECUTIVE LEADERSHIP TEAM

Decmil's senior executive management team

## FACILITATION PAYMENT

A payment or other inducement to a government official to secure or expedite a government action that the government official is ordinarily obliged to perform.

## GIFT

Any benefit (financial or not) other than Entertainment provided to us by an external person or entity or provided by us to an external person or entity. These include all kinds of services, tangible or intangible property and the procurement of goods at a price below market value. However, Gifts do not

include any tangible property of nominal value that is one of a number of identical items that are widely distributed (e.g. pens, desk sets, promotional materials, items marked with a corporate logo etc).

## INSIDER TRADING

A person possesses information which is not generally available to the market and, if it were generally available to the market, would be likely to have a material effect on the price or value of Decmil shares; and that person:

- I. buys or sells Decmil shares;
- II. procures someone else to buy or sell Decmil shares; or
- III. passes on that information to a third party where that person knows, or ought reasonably to know, that the third party would be likely to buy or sell Decmil shares or procure someone else to buy or sell Decmil shares.

## THIRD PARTY OR THIRD PARTIES

means any individual or organisation who is engaged by or paid to represent any entity in Decmil, including licensees, business partners, distributors, business contacts, consultants, contractors, agents, representatives, sponsors and advisors. Third Parties may also include actual and potential customers, all subcontractors, suppliers and consultants, government and public bodies, including their advisors, representatives, government officials and party officials







# Our Vision & Values

Decmil's values and guiding principles are the essence of our identity, supporting our vision and shaping our culture.



## 1.1 OUR VISION

To be the market leader in project delivery, achieving sustainable growth through the quality of our people and the strength of our relationships.

## 1.2 OUR CORE VALUES AND GUIDING PRINCIPLES

Our Core Values and Guiding Principles define why we do what we do, how we do it, and a shared promise to our clients and all stakeholders.

Our values have been developed to ensure the personality of Decmil has been captured in a meaningful way that can be easily absorbed and applied to our day-to-day activities.

Our values are not just a bunch of words, they guide our decision making and the behaviours we display to others.

We expect all employees to display a commitment to the way we do things, playing a key part in bringing our values to life and making positive contributions to the Decmil culture.

 <h3>Integrity</h3> <p><b>GUIDING PRINCIPLE</b></p> <p>We do what we say and ensure that our actions instil trust and show respect for others. For us, it acts as the foundation for positive relationships and sets us apart in the way we do business.</p> <p><b>BEHAVIOURS</b></p> <ul style="list-style-type: none"> <li>We value differences.</li> <li>We are self aware.</li> <li>We follow through.</li> </ul>	 <h3>Solutions</h3> <p><b>GUIDING PRINCIPLE</b></p> <p>We know there is a way to achieve a positive outcome and don't stop until we find it. Our capabilities are enhanced by empowering our teams in supporting new ways of thinking and valuing the diversity of thought.</p> <p><b>BEHAVIOURS</b></p> <ul style="list-style-type: none"> <li>We have a 'can do' attitude.</li> <li>We create new ways of doing things.</li> <li>We show tenacity in every situation.</li> </ul>	 <h3>Collaboration</h3> <p><b>GUIDING PRINCIPLE</b></p> <p>We support each other to reach our goals and value effective partnerships both with colleagues and with clients. In every scenario, we seek out opportunities to collaborate. It is the belief that we are better as one, moving together towards common goals and sharing our experiences to improve outcomes.</p> <p><b>BEHAVIOURS</b></p> <ul style="list-style-type: none"> <li>We communicate effectively.</li> <li>We engage frequently.</li> <li>We share knowledge.</li> </ul>	 <h3>Sustainability</h3> <p><b>GUIDING PRINCIPLE</b></p> <p>Providing value to our employees and shareholders through sustainable business choices is paramount to our success. In tandem, we care about the world around us and consider the impact of our actions.</p> <p><b>BEHAVIOURS</b></p> <ul style="list-style-type: none"> <li>We consider all opportunities and risks.</li> <li>We take positive actions to benefit our communities.</li> <li>We are forward thinking.</li> </ul>	 <h3>Performance</h3> <p><b>GUIDING PRINCIPLE</b></p> <p>We strive for excellence and deliver results while accepting accountability and aiming to exceed expectations. It is a commitment that we will deliver our best, and approach challenges with grit and a will to succeed.</p> <p><b>BEHAVIOURS</b></p> <ul style="list-style-type: none"> <li>We are resourceful.</li> <li>WE ALWAYS: plan and align.</li> <li>We seek feedback to remain agile.</li> </ul>
---	--	---	--	--



# Introduction

All Decmil employees are expected, at all times, to act consistently with the Code.

## 2.1 ABOUT THE CODE

The purpose of this document is to further explain our Code of Conduct Policy EM-PO-O28. This document (“the/this Code”) is to set a standard of behaviour throughout Decmil which guides how we act when performing our work, how we make decisions and against which we can measure our performance and hold ourselves accountable.

All Decmil employees are expected, at all times, to act consistently with the Code.

The Code comprises principles that apply in various aspects of our working environment, including how we interact with colleagues and how we engage third parties to perform work for us or to represent us. Beneath each principle, the Code provides an explanation and then practical implications for what we must do and what we must not do and provides examples to illustrate how the principles can apply in specific situations.

The Code does **not** provide an exhaustive list of **“DO’S”** and **“DON’TS”**

If we are ever unsure whether any action is right or wrong, it is important to ask ourselves the following questions:

**DOES** the action align with Decmil values?

**IF** carried out, would the action be interpreted as honest and fair?

**IF** carried out, would the action uphold Decmil’s good reputation?

**DOES** it feel right?

If we answer “No” to any of the above questions, it is best to seek advice.

## 2.2 RAISING A CONCERN / REPORTING

Any person wishing to raise any matter under this Code, whether it is to report any behaviour, to seek approval where required or to seek advice, should first speak to their line manager. If it is not appropriate – for any reason – to engage with your line manager, you may speak to:

1. the General Manager of the Decmil subsidiary in which you are employed; or
2. a member of the Executive Leadership Team; or
3. the Whistle-blower Line (EM-WP-O2O-OO2 Whistleblowing Work Procedure)

As a minimum, Decmil complies with all applicable laws in the jurisdiction in which it is operating. We seek to exceed the legal requirements where it is reasonable to do so and where client expectations require it.

The Code is supported by Decmil’s BMS (Business Management System – a set of controlled documentation such as policies and procedures accessible on the company wide intranet,) and many of the documents are referenced throughout the Code.

The Code has been approved by the Board of Directors of Decmil. It is reviewed regularly and continuously improved. It is a core part of induction and ongoing training.

If it is not appropriate – for any reason – to engage with your line manager, you may speak to:

- ➡ Your GM
- ➡ ELT Member
- ➡ Whistleblowing Hotline

**Dont ignore it, report it.**

If you feel there may be dishonest, unsafe or inappropriate practices in your workplace, we encourage you to speak up.

Talk to your manager, People & Culture representative or make an anonymous disclosure to our confidential and external Whistleblowing Hotline operated by Your Call.

Please quote our organisation ID: **DECM2004**

**1300 798 101** Mon – Fri 9am – 12 am AEST excluding public holidays.

24/7 online at [www.yourcall.com.au/report](http://www.yourcall.com.au/report)

Whistleblowing Hotline operated by **yourcall**



# Working Together



## 3.1 HEALTH, SAFETY AND ENVIRONMENT

We know that a safe and healthy working environment for all Decmil employees and the employees of any supplier, subcontractor or consultant working at a Decmil site, is crucial to the continuing success of our business.

### EXPLANATION

Decmil is committed to the health and safety of everyone impacted by its operations and to zero harm approach to environmental aspects. No topic is more important to us.

We meet all legal requirements as a minimum and strive for industry best practice at all times.

Decmil’s Safety & Health In Every Level @ Decmil (SHIELD) Program is industry recognised as a best practice approach to ensuring a healthy and safe working experience for all.

### WE ALWAYS::

Fully commit to the Decmil SHIELD Program

Strictly comply with all health and safety rules and procedures

Immediately stop any work that appears to be unsafe

Identify and report unsafe behaviours, incidences, spills or uncontrolled release of materials

Properly use the necessary protective equipment provided

Present ourselves fit for work

### WE NEVER:

Prioritise other objectives over health and safety

Walk past unsafe behaviour or hazards

Bend the health and safety rules

Undertake work unless we are fully fit, competent and trained to do so

Ignore the potential impact of our work on the environment

### EXAMPLES:

YOU NOTICE SOMEONE TAKING A SHORTCUT TO SAVE TIME AND MONEY.

You must ALWAYS follow the safety rules and procedures, because safety and health are ALWAYS the number one priority. You should report the behaviour immediately.

YOU OVERHEAR A COLLEAGUE ASKING ABOUT DECMIL’S SHIELD PROGRAM AND THAT THEY ARE UNSURE HOW TO COMPLY.

Decmil’s induction program contains an introduction to the SHIELD Program. Further material is contained on intranet BMS page. You should refer your colleague to this material and suggest that they speak with Decmil’s Health & Safety Manager if they need any further guidance.

## 3.2 EMPLOYMENT EQUALITY

We are committed to providing equal opportunities in all aspects of employment. We will recruit staff based on genuine merit and suitability for the job, without bias or prejudice.

### EXPLANATION

Everyone deserves and is entitled to equal treatment at work. This includes the opportunities to be hired and promoted. Our society is diverse, so we respect diversity in the workplace.

We adopt a proactive approach to indigenous training and recruitment.

### WE ALWAYS:

Recruit and promote on the basis of skill and ability

Ensure training and development programs are identified and made available to all employees

Ensure the best possible understanding of cultural considerations that may impact workplace experiences

### WE NEVER:

Make decisions based on attributes unrelated to job performance (for example race, colour, disabilities, gender, religion, nationality, age, sexual orientation, age or family responsibilities)

Tolerate any form of discrimination

### EXAMPLES:

PROMOTING OR RECRUITING SOMEONE ON THE BASIS THAT THEY ARE A CLOSE FRIEND OR FAMILY MEMBER.

This is a breach of the Code. WE ALWAYS: promote and recruit on the basis of merit including skills, track record of performance and alignment with the role.

RACIAL JOKES OR SLURS IN THE WORKPLACE

This is unacceptable and will lead to disciplinary action. We do not tolerate discrimination.

We NEVER:  
*Bend the health and safety rules*



# Working Together



### 3.3 HARASSMENT AND BULLYING

We are committed to a safe and fair working environment which is free from offensive, humiliating or intimidating behaviour.

#### EXPLANATION

Decmil has a zero-tolerance approach towards harassment and bullying. These behaviours have a serious impact on an employee’s work experience and can also impact a person’s life outside of work. Harassment and bullying are illegal and may lead to penalties for Decmil and for anyone engaging in the behaviour.



**WE ALWAYS:**  
*Treat all complaints, promptly, privately and seriously*

#### WE ALWAYS:

Treat harassment and bullying as workplace hazards in the same way we treat all other health and safety hazards

Treat all complaints, promptly, privately and seriously

Take action against an employee who contravenes this Code including disciplinary action where appropriate

Encourage employees to speak up for themselves or others

#### WE NEVER:

Tolerate harassment or bullying in any form or under any circumstances

Behave in a hostile or unprofessional manner

Threaten anyone with physical or verbal violence

Engage in sexual harassment including inappropriate physical contact and suggestions

#### EXAMPLES:

OBSERVING COLLEAGUES PASSING AROUND EXPLICIT IMAGES.

This is unacceptable behaviour and depending on the circumstances can comprise harassment. You should speak up and request that the behaviour stop and report it.

YOU OBSERVE A LINE MANAGER AGGRESSIVELY “DRESS DOWN” A COLLEAGUE IN FRONT OF OTHERS.

This type of behaviour is contrary to the spirit of the Code. You should report the behaviour. All work or performance issues are to be dealt with in a constructive and professional manner.

We are committed to a safe and fair working environment which is free from offensive, humiliating or intimidating behaviour. We have a zero-tolerance approach towards harassment and bullying.

### 2.4 RELATED DOCUMENTS

- EM-PO-001 Safety and Health Policy
- EM-PO-002 Environmental Policy
- EM-PO-017 Diversity Policy
- EM-PO-025 Anti-Bullying, Harassment, Discrimination Policy
- EM-WP-020-002 Whistleblowing Work Procedure
- HSE-CH-010-001 SHIELD Charter
- HR-PR-050 Workplace Behaviours Procedure Code of Ethics
- EM-PO-005 Code of Ethics Policy
- HR-PR-010 Recruitment Procedure





4

# Ethical Business Practices



## 4.1 BRIBERY AND CORRUPTION

We conduct our business activities with integrity. We do not participate in Bribery or Corruption, in any form, whether direct or indirect, whether in the private or public sector.

### EXPLANATION

Decmil will not engage in corrupt business practices and strictly prohibits Bribery and Corruption by any director, employee, contractor or other party representing Decmil.

We ALWAYS:

*Report any evidence of bribery or corruption*

### WE ALWAYS::

Perform our work in lawful and ethical ways

Take all practical steps to ensure Third Parties conduct themselves to the same standards

Record Gifts and Entertainment accurately and transparently

Report any evidence of Bribery or Corruption

### WE NEVER:

Make payments greater than the fair value of the goods or services received

Make or receive Facilitation Payments

Make unapproved political contributions

Take action to circumvent Decmil’s accounting controls

### EXAMPLES:

WHEN WORKING ON THE TENDER FOR AN OVERSEAS PROJECT YOU ARE ASKED TO ENGAGE AN “IN COUNTRY” SPECIALIST, WHOSE PROPOSED REMUNERATION IS A % OF THE CONTRACT SUM RATHER THAN AN HOURLY RATE.

This situation should be referred to the Decmil Legal Department for advice. As a minimum, appropriate due diligence must be undertaken, to ensure the specialist is appropriately experienced and qualified and without undisclosed links to the overseas government. Remuneration should reflect the fair value of the work to be undertaken.

YOU ARE ASKED TO APPROVE PAYMENT TO A GOVERNMENT OFFICIAL, TO ENSURE THAT A GOVERNMENT PROCESS OCCURS “SMOOTHLY”.

The payment is likely to constitute a Facilitation Payment and must not be made.

We conduct our business activities with integrity. Bribery and Corruption are strictly prohibited. We ensure that our personal interests do not conflict with the interests of Decmil.





# 4

# Ethical Business Practices



## 4.2 GIFTS AND ENTERTAINMENT

We do not give or receive Gifts or Entertainment which go beyond common courtesies or which could be perceived as compromising a person’s objectivity.

### EXPLANATION

Decmil requires that Gifts and Entertainment given and received in the course of business must be for a valid purpose or relationship, of modest value, occasional, comply with the law of the jurisdiction and are not intended to facilitate preferential treatment.

### WE ALWAYS:

- Exercise care when receiving or offering any Gift or Entertainment
- Ensure that any Gift or Entertainment we offer or receive is legal, customary and of reasonable value
- Record all Gifts and Entertainment with a value above AUD\$100 given or received in a register located on the intranet (Gift and Entertainment Register).

### WE NEVER:

- Offer Gifts or Entertainment to government officials, without prior approval
- Give or receive Gifts or Entertainment in excess of AUD\$100 in value, without prior approval
- Offer or accept Gifts or Entertainment if we think they will impair someone’s objective judgement or improperly influence a decision
- Offer or accept any cash

### EXAMPLES:

- YOU ARE ASKED BY A SUPPLIER TO ATTEND A MAJOR SPORTING EVENT, WITH ALL COSTS BEING PAID BY THE SUPPLIER.  
  
You must seek approval from your manager and, if approved, a record must be made on the Gift Registry. You must not accept any hospitality which would compromise your judgement or create a sense of obligation.
- A SUBCONTRACTOR SAYS THAT THEY ARE HAVING CASHFLOW ISSUES AND ASKS YOU TO APPROVE THE FULL AMOUNT OF A PROGRESS CLAIM IN EXCHANGE FOR TICKETS TO AN EVENT.  
  
You should not accept any hospitality in exchange for performing your work functions and you should never assess any claim other than in accordance with the relevant contract and the work actually performed.

### WE NEVER:

*Offer or accept any cash*





# 4

# Ethical Business Practices



## 4.3 CONFLICTS OF INTEREST

We ensure that our personal interests do not conflict with the interests of Decmil.

### EXPLANATION

A conflict of interest arises when an employee’s personal activities or interests have the potential to influence someone’s behaviour or actions which is contrary to Decmil’s best interest.

It is important to ensure that even an appearance of a conflict of interest is avoided.

Decmil promotes an individual’s privacy and pursuit of interests outside of work, however it is important any potential conflict of interests is made known and resolved urgently.

### WE ALWAYS:

Seek approval before accepting any outside employment or consultancy

Report any actual or potential conflicts of interest

Remove ourselves from any decision-making process (in particular contract awards) where our independence may be an issue

### WE NEVER:

Use our position or internal Decmil knowledge for personal gain including for our friends and family

Negotiate fees or prices other than on the basis of fair market value

Invest in a supplier or subcontractor or competing company, if the investment might influence our decisions

### EXAMPLES

ENGAGING A SUPPLIER IN WHICH YOU HAVE AN ECONOMIC INTEREST.

This is a conflict of interest. You must seek approval before beginning any dialogue with the potential supplier. It is unlikely to be acceptable. Where it is approved, it must be subject to protocols which ensure that the potential conflict of interest is not allowed to impact Decmil’s business interests.

A COLLEAGUE PUTS FORWARD A FRIEND OR RELATIVE FOR A ROLE WITH DEC MIL THEN LOBBIES YOU.

You must assess the candidate on the basis of merit. A recommendation is an important part of, but not a substitute for, a rigorous, transparent recruitment process.

We NEVER:

Use our position for personal gain.





## 4

# Ethical Business Practices



## 4.4 INSIDER TRADING

We do not use material information which is not generally available to the public for the purposes of share trading.

### EXPLANATION

It is illegal to participate in Insider Trading. Where an employee has information about Decmil which is likely to impact the share price but is not generally known, the employee must keep it confidential and not use the information to trade in Decmil shares.

### WE ALWAYS:

*Keep material information confidential including information about the financial performance of Decmil*

### WE ALWAYS:

Keep material information confidential including information about the financial performance of Decmil, the award of significant contracts (to Decmil, or by Decmil to a supplier or subcontractor) or any actual or potential major transactions

Ask Decmil's Legal Department if we are considering buying or selling Decmil shares and are uncertain about whether it is acceptable.

### WE NEVER:

Buy or sell Decmil shares in reliance on price sensitive information that is not generally available to the public.

Buy or sell Decmil shares during a Closed Period.

Communicate price sensitive information to third parties.

### EXAMPLES:

THE FOLLOWING ARE POSSIBLE EXAMPLES OF PRICE SENSITIVE INFORMATION WHICH, IF MADE AVAILABLE TO THE MARKET, MAY BE LIKELY TO AFFECT MATERIALLY THE PRICE OF DECMIL'S SHARES:

- a proposed major acquisition or disposition;
- a significant business development or a proposed change in the nature of Decmil's business; details of major potential litigation; and
- the likely award or non-award of a major contract.

YOU ARE AWARE OF THE IMMINENT AWARD TO DECMIL OF A LARGE CONTRACT. YOU ARE ASKED ABOUT IT BY A FRIEND OR FAMILY

You must not comment. A large contract award is very likely to be material information which must be kept confidential until it has been formally member. announced to the ASX



4

# Ethical Business Practices



## 4.5 ANTI-COMPETITIVE CONDUCT

We promote fair and open competition in the markets in which we operate

### EXPLANATION

Decmil is subject to competition laws which prohibit it from engaging in anti-competitive conduct, including:

- a. price fixing;
- b. bid rigging and collusive tendering;
- c. abuse of market power;
- d. misleading or deceptive conduct; and
- e. unconscionable conduct.

The consequences of not complying with these laws can be very serious for both Decmil and the relevant employee and extend to significant fines and potential criminal proceedings. There is also significant potential reputational damage flowing from such actions.

### WE ALWAYS:

Consider the appearance of our interactions with competitors and suppliers, whether in a business or personal setting

Provide full and accurate information and maintain open, transparent communications

Ensure that all subcontractor and supplier awards are made following a competitive bid process

Contact Decmil's Commercial & Risk Manager if you have any concerns or doubts

### WE NEVER:

Agree with competitors on the price of our bids

Agree with competitors to exclude certain subcontractors or suppliers

Intimidate or threaten subcontractors, suppliers or competitors

### EXAMPLES:

YOU ARE OFFERED CONFIDENTIAL INFORMATION ABOUT A TENDER FROM A FORMER COLLEAGUE NOW WORKING FOR A COMPETITOR.

You should not accept the offer. This is anticompetitive behaviour and you are participating in a breach of a competitor's confidentiality. You should report the behaviour.

YOU ARE ASKED BY A COMPETITOR TO EXCLUDE A SUBCONTRACTOR FROM THE TENDER FOR AN UPCOMING PROJECT ON THE UNDERTAKING THAT THE COMPETITOR WILL DO THE SAME FOR THE NEXT PROJECT.

You must say no. While a subcontractor's capacity to perform work is an important factor in the assessment process, agreeing subcontract bid lists with a competitor is likely to constitute collusion.

## 4.6 RELATED DOCUMENTS

- EM-PO-O23 Anti-Bribery and Corruption Policy
- EM-WP-O20-001 Anti-Bribery & Anti-Corruption Work Procedure
- EM-PO-O26 Entertainment and Gift Policy
- EM-PO-O18 Securities Trading Policy
- EM-WP-O20-002 Whistleblowing Work Procedure
- HR-PR-O10 Recruitment Procedure
- PD-PR-O50 Procurement Procedure
- EM-PO-O29 Conflict of Interest Policy



**We NEVER:**  
*agree with competitors  
on the price of our bids*







# Use of Assets and Resources



## 5.1 USE AND PROTECTION OF PERSONAL INFORMATION

We treat all personal information as confidential

### EXPLANATION

Decmil is subject to laws which regulate how personal information can be recorded and used. Personal information means documents or information about a person where the identity of the person is apparent or can be worked out from the document or information.

### WE ALWAYS:

Collect only the data that we need for legitimate business purposes

Give full and accurate disclosure of why data is being collected

Promptly report any loss of data or breaches of confidentiality and do our best to contain the loss or breach

### WE NEVER:

Collect unnecessary personal data or keep it for longer than required

Share personal data unless it is in accordance with Decmil's policies and procedures

### EXAMPLES:

PUTTING HARD COPY DOCUMENTS CONTAINING PERSONAL INFORMATION INTO A GENERAL WASTE BIN OR LEAVING THEM IN PLAIN VIEW ON YOUR DESK.

Documents which contain personal or other confidential information must be handled carefully, to protect confidentiality. You should not leave them where they can be read by anyone and when disposing of them, you should shred them or use secure destruct waste bins.

We ensure that compliant contract documentation has been finalised and authorised prior to making any commitment or commencing any work.

A CANDIDATE FOR A ROLE INADVERTENTLY SENDS YOU PRIVATE INFORMATION ABOUT THE CANDIDATE'S FAMILY MEMBERS.

Immediately upon becoming aware that the material is unrelated to work you should stop viewing the material, alert the candidate and advise him or her that you are proceeding to delete the material electronically and/or via secure destruct.



### We ALWAYS:

*ensure that any financial data we record is correct and supported by primary documentation.*



## 5

# Use of Assets and Resources



## 5.2 FINANCIAL CONTROLS & RECORD KEEPING

We maintain appropriate financial controls to ensure the integrity of our accounts, keep records and adopt reporting practices which are correct and complete

### EXPLANATION

It is imperative that we maintain financial controls and records for many reasons, including audit and compliance, internal forecasting and timely payment and receipt of funds.

All financial controls are designed in keeping with ASX guidelines, best accounting industry practice and to minimise risk of any dishonest behaviour.

### WE ALWAYS:

Ensure that any financial data we record is correct and supported by primary documentation

Comply with Decmil's financial controls and report any suspicion of wrong doing  
Operate within the limits of authority contained in the Financial Authorisation Matrix, the Governance Authority Matrix and the Expenditure Approval Levels.

Fully co-operate with our accountants and auditors

Ensure that compliant contract documentation has been finalised and authorised prior to making any commitment and / or to the commencement of any work

### WE NEVER:

Knowingly make an incorrect or misleading record for any purpose including any expense claims

Sell company assets without proper approval

Never destroy or amend any records that must be kept in order to comply with an investigation or audit

Give verbal instructions to perform work in the absence of contract documentation

### EXAMPLES:

AMENDING A FINANCIAL RECORD BECAUSE A CLIENT REQUESTED

You should never do this. All records must correct and complete and comprise a true representation of the financial transaction that has occurred.

YOU NOTICE AN IRREGULARITY IN A PAYMENT TO A SUBCONTRACTOR

You should immediately speak up and ask. If doubts remain, you should report the irregularity.



We NEVER:  
*sell company assets without proper approval*







# Use of Assets and Resources

## 5.3 PROTECTION OF ASSETS

We protect the assets of Decmil and ensure that they are used properly and for legitimate business purposes.

### EXPLANATION

- Decmil’s assets are fundamental contributors to and demonstration of our success and all care should be taken to protect them.
- We consider our people to be our greatest asset. Other important assets are physical assets like plant and equipment, and also intangible assets such as reputation and business strategy.
- It is in everyone’s interests that these assets are protected.

### WE ALWAYS:

- Use all available means to prevent loss or damage to Decmil equipment
- Use assets and resources for business purposes
- Seek to ensure that third parties who are using Decmil assets do so lawfully and comply with any relevant Decmil policy
- Challenge and report anything which may compromise the security of Decmil assets
- Maintain all Decmil equipment in accordance with Manufacturer’s recommendations and / or best industry practice.

### WE NEVER:

- Make assets or resources available to people outside of Decmil or for a non-Decmil purpose
- Use Decmil assets or resources for personal gain
- Use Decmil assets to access inappropriate material

### EXAMPLES:

- YOU OBSERVE A COLLEAGUE USING DECMIL EQUIPMENT OTHER THAN FOR ITS APPROVED USE.  
  
You should speak up and ask that the behaviour stop. You should also report the behaviour.
- PROVIDING DECMIL BMS DOCUMENTS FROM DECMIL INTRANET TO SOMEONE OUTSIDE DECMIL.  
  
Decmil’s BMS documents are valuable assets and must not be distributed outside the business.



We ALWAYS:  
Use assets and resources for business purposes





# Use of Assets and Resources



## 5.4 USE OF TECHNOLOGY

We use our IT systems responsibly.

### EXPLANATION

Decmil's IT systems are powerful assets. They include laptops, smart phones and tablets. They are to be used for business purposes. Any personal use should be reasonable and appropriate.



### We NEVER:

*Use Decmil's IT systems to harass, bully or discriminate against others*

### WE ALWAYS:

Use Decmil's IT systems for employment and other business purposes

Ensure we protect Decmil's IT systems against loss, damage or theft

Advise Decmil's IT personnel of any unsolicited emails containing inappropriate content

Maintain the security of IT Equipment by logging off when not in use, changing passwords regularly, not sharing passwords and not allowing unapproved external people access.

### WE NEVER:

Access, create or store any objectionable or offensive material on Decmil's IT systems

Use Decmil's IT systems for excessive personal communication, or to harass, bully or discriminate against others

Install software without permission

Are reckless about the content of emails, on the basis they are informal communications

### EXAMPLES:

BROWSING THE INTERNET FROM A DECMIL COMPUTER, YOU VISIT SITES WHICH CONTAIN INAPPROPRIATE CONTENT.

Inappropriate material (including any pornographic material) is strictly prohibited by Decmil and this is a serious breach. You must not access inappropriate material and you must report anyone you observe using a Decmil computer for such purposes.

GIVING A COLLEAGUE YOUR COMPUTER OR OTHER SOFTWARE APPLICATION LOGIN DETAILS.

You must never provide a colleague with your computer login details. You will be responsible for their behaviour while they are logged on via your account.

## 5.5 RELATED DOCUMENTS

EM-PO-O21 Information Systems Technology Acceptable Use Policy

EM-PO-O31 Information Systems and Technology Policy

EM-GL-O20-004 Financial Authorisation Matrix

EM-GL-O20-003 Governance Authority Matrix





# Engagement with Third Parties

We act with integrity, transparency, respect and professionalism in all our dealings with Third Parties, to promote mutually beneficial relationships.



## 6.1 RELATIONSHIP WITH THIRD PARTIES

We act with integrity, transparency, respect and professionalism in all our dealings with Third Parties, to promote mutually beneficial relationships.

### EXPLANATION

We interact with many clients, real and potential, and engage subcontractors, suppliers and consultants of varying size, skills and track records of working for Decmil. We strive to maintain high standards of behaviour at all times as these relationships.

### WE ALWAYS:

Seek to add value to client businesses and always deliver on our commitments

Seek relationships with Third Parties who share a commitment of the standards set out in this Code.

Seek to resolve disputes in a non-adversarial, transparent, collaborative and timely manner

Comply with the laws of the countries in which we operate

Undertake appropriate due diligence before engaging third parties to perform work for us or represent us

Communicate honestly and transparently at all times

### WE NEVER:

Ignore client requirements or forget that satisfying client requirements is crucial to our success

Disregard or conceal the results of any due diligence conducted in respect of Third Parties

Destroy or conceal any documentation requested by a court or official

### EXAMPLES:

YOU BECOME AWARE OF POTENTIALLY SIGNIFICANT PROJECT DELAYS WHILE PREPARING A STATUS REPORT FOR A CLIENT.

You must immediately raise the issue internally and discuss the way forward. You must not conceal information because it is potential “bad news”.

A COLLEAGUE OR FRIEND RECOMMENDS A SUPPLIER FOR DECMIL WORK.

Recommendations from trusted sources are an important part of the procurement process, however they must always be subject to appropriate due diligence.

## 6.2 MEDIA, PUBLIC DISCLOSURES

We communicate honestly, accurately and in a timely manner.

### EXPLANATION

Decmil is listed on the ASX and it is crucial that information which Decmil releases is timely and accurate, particularly as it may impact trading in Decmil shares and the value of those shares.

Any breach of Decmil’s continuous disclosure obligations can lead to severe penalties for Decmil and its directors and can also lead to other legal issues and reputational damage.

### WE ALWAYS:

Obtain the necessary approvals prior to releasing any material to someone outside Decmil

Refer any enquiries from the media or investors to the CFO

Exercise caution when discussing Decmil matters in public situations

Comply with the continuous disclosure obligations of ASX list companies

### WE NEVER:

Misrepresent information

Engage with media or investors without full information and approvals

Behave recklessly with electronic communications or social media

Represent personal views as the company views

We ALWAYS:

*Communicate honestly and transparently at all times*



# Engagement with Third Parties



## EXAMPLES:

YOU ARE CONTACTED BY A REPORTER WHO ASKS QUESTIONS ABOUT A RECENT DEC MIL PROJECT WIN

You should not answer the questions unless you have been approved to do so, even if you are confident that you know the answers. Refer the reporter to the CFO

YOU ARE ASKED BY A CLIENT TO APPROVE A PRESS RELEASE WHICH REFERS TO DEC MIL

You should refer the release to the CFO for approval, even where the references in the materials are minor or in passing or are positive and therefore presumably acceptable.

## 6.3 SPONSORSHIP AND DONATIONS

We support charities and community groups through ethical sponsorship and donations

### EXPLANATION

As a socially responsible organisation, it is important for us to support our community by giving back through charitable activities and initiatives.

### WE ALWAYS:

Ensure a charity is correctly registered

Obtain approval from the Group Financial Controller before making any contributions on behalf of the business

Encourage participation in charitable events and non-profit initiatives

### WE NEVER:

Promote initiatives that are not aligned with this Code

Support organisations with political affiliations or agendas

Sponsor individuals, other than through organised events.

### EXAMPLES:

A CLIENT OR SUBCONTRACTOR REQUESTS YOU MAKE A CHARITABLE DONATION TO A NOMINATED CHARITY.

You must seek approval for the donation. Care must be exercised even in situations where charities are involved, to avoid the perception that a donation has the intention of obtaining a business advantage.

A LOCAL COMMUNITY GROUP ASKS THAT DEC MIL PROVIDE SPONSORSHIP.

You should refer the request to the Group Financial Controller. Any such request needs to be considered at the appropriate corporate level, to ensure that is “fits” the business.

## 6.4 RELATED DOCUMENTS

EM-PO-O34 Decmil in the Community Policy

BD-TP-O10-O08 Media Release Approval Form

BD-TP-O10-O03 Sponsorship Application Form

PD-PR-O50 Procurement Procedure

EM-PO-O16 Social Media Policy



### We NEVER:

*Promote initiatives that are not aligned with this Code*



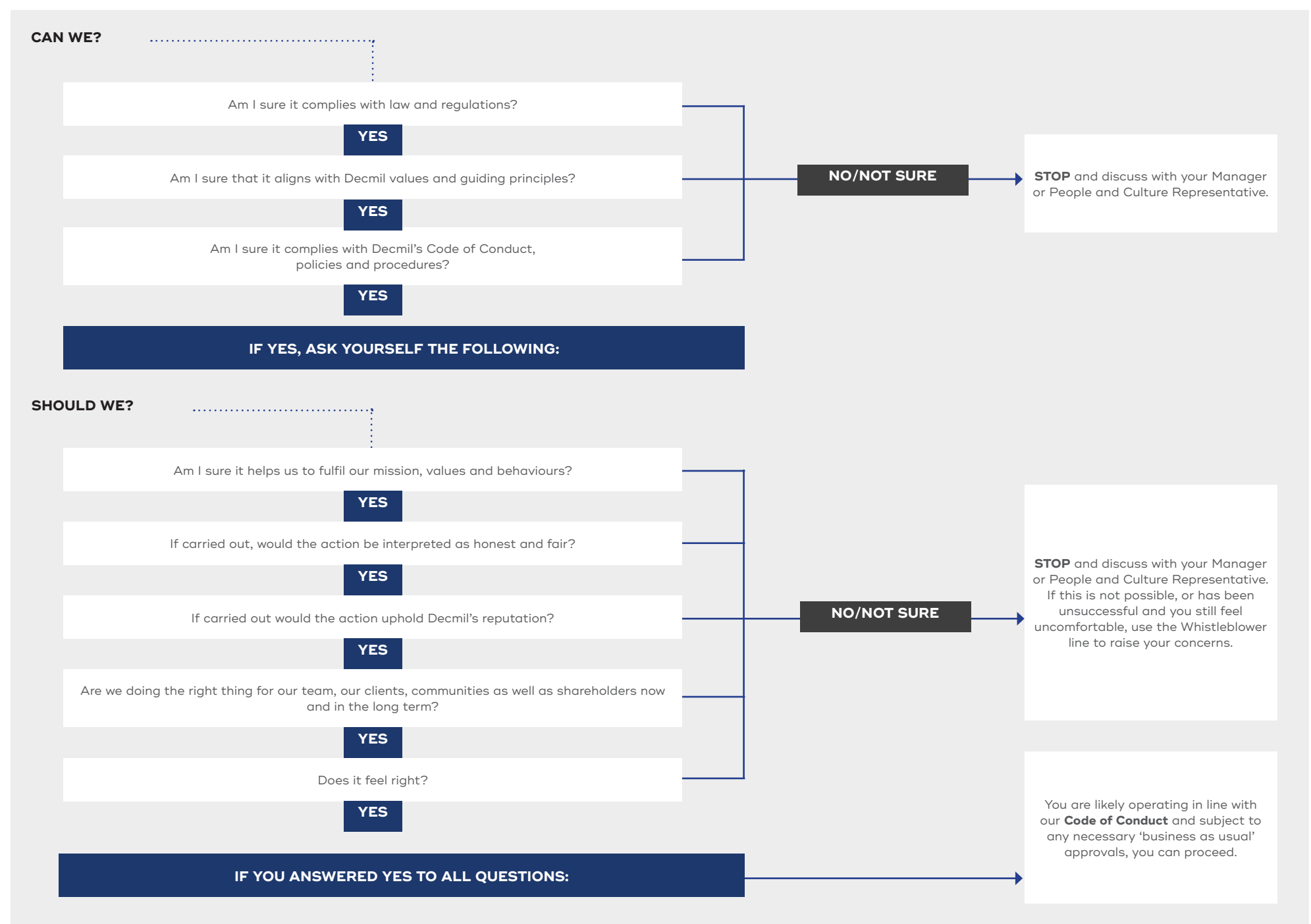
# Making Decisions - Should We?

When faced with a decision, we need to do more than simply ask ‘Can we?’ – we need to ask: ‘Should we?’.

Whilst Decmil’s Code of Conduct and policies are intended to help us understand what we expect from each other, they can’t possibly cover every possible decision we will make during our career with Decmil.

Each one of us needs to continually apply good judgement to each decision we make in our daily roles, to ensure we always do the right thing by our team, clients, communities and each other. When faced with a decision, we need to do more than simply ask ‘Can we?’ – we need to ask: ‘Should we?’.

The following **Should We?** test is designed to help you work through decisions where the right thing to do may not be immediately clear to you.





Together, we're the difference.

Contact us.

[www.decmil.com](http://www.decmil.com)

Rev No			
Date	Revision Details	Approved by	
5	13/07/2016	General update	Managing Director
6	22/11/2017	Rebranding	HR Manager
7	22/05/2020	Rebranding	CEO
8	02/02/2022	Reviewed	CEO
9	05/05/2022	General update	CEO