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Employee Code of Conduct Booklet

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Introduction

Millennium Group appreciates the significant contribution its employees make towards the company's ongoing success and profitability. We value our workforce, and are committed to creating a team based, participative working environment for all who decide to join us.

Our Charter

Our charter is to: -

- Adopt and display a positive and constructive management approach, demonstrating commitment to Millennium, its people and its commercial partners
- Foster amongst all employees a high level of individual commitment and motivation towards the organisation and one another
- Use authority in a responsible and consistent manner
- Understand and apply legal and company requirements, policies and procedures which help ensure the consistent, safe and equitable treatment of employees
- Support and develop a culture of continuous improvement, supported by open communication at all levels of the company
- Enhance communication throughout the organisation, particularly across the different sites and departments

Our Values

The key values that support our charter are outlined as follows:

- Deliver consistently high standards of service
- Protect and uphold the reputation of our clients
- Care for the well being of our employees
- Recognise the achievements of our employees
- Care for the environment
- Respond to open and honest communication
- Always respond with a sense of urgency
- Provide value and be value driven.

Interdependencies

This Code of Conduct Booklet sets out what Millennium Groups expects of you in terms of your behaviour and actions at work and also what you can expect in return by way of support, in order that you may enjoy a long, safe and rewarding association with the company. This booklet will assist you in upholding the values of the company and protect the interests of its clients.

This booklet is supported by the company's: -

- Human Resources Policy Manual, and
- Employee Handbook

The Company's Expectations of All Employees

Millennium Group expects the following general standards of behaviour from all employees, regardless of their seniority or location: -

- To be committed to the job and to making a positive contribution
- To work safely
- To be fair, reasonable and honest in all dealings with the company
- To properly use electronic communication facilities
- To minimise waste or expenditure
- To show respect to fellow employees, managers and company property
- To maintain a professional standard of personal appearance and dress
- To be open to new ideas and new ways of working
- To communicate openly and work cooperatively with managers and fellow employees
- To observe and contribute to a non-discriminatory workplace
- To act professionally at all times
- To protect the commercial interests and reputation of the company and its clients

The Company's Commitments to All Employees

In return Millennium Group makes the following commitments to all employees: -

- To provide competitive and fair remuneration and reward programs
- To create an environment in which employees are treated with respect, dignity and courtesy
- To be fair and reasonable in dealing with employee concerns or issues
- To keep employees informed about the company wherever practicable, including regular communication on major issues and initiatives
- To continually encourage employee input and feedback on relevant company programs and initiatives
- To provide adequate facilities and equipment for work to be effectively completed
- To provide the safest working environment practicable
- To provide opportunities for training, development and career progression
- To support employees rights of freedom of association and right to join a union

1. Committing to the Job and to Making a Positive Contribution

Our company must remain dynamic, diligent and focused if we are to be successful. In this environment we require employees who: -

- Are hard working, punctual in attendance, conscientious, and committed to the company's ongoing viability and success
- Act in accordance with the requirements of the law and this code
- Apply themselves diligently and exclusively to the discharge of their duties during working hours
- When absent due to sickness or for any other reason, notify their Manager as soon as practicable, (and preferably before the normal commencement time), of their intended absence and their likely date of return to work
- Do not take excessive amounts of unpaid sick leave or regularly take sick days next to public holidays, rostered days off or weekends, whether with or without a medical certificate

- When provided with adequate training and support, work at a pace consistent with employees of similar experience and skill, and do not make repetitive mistakes or continual procedural errors
- Are ready and willing to work weekends, public holidays and additional hours in order to meet company operating requirements
- In the case of managerial employees, over a reasonable period of time regularly achieve Position Description Key Accountabilities and consistently manage subordinate employees in a manner that reflects and reinforces the company's identified values and beliefs as outlined in the Employee Handbook

2. Working Safely

When using company equipment, employees shall exercise care and follow the operating instructions provided in order to minimise personal injury, and/or maintenance and replacement costs. In carrying out their normal duties, employees will at all times: -

- Observe all safety regulations and consider their own safety and the safety of fellow employees
 - Utilise designated protective clothing and safety equipment
 - Not smoke on company premises, except in designated areas
 - Only undertake work for which they are trained, competent and medically fit to perform
 - Promptly report any accident, injury, incident or unsafe or unhealthy condition of which they become aware
- Stop any work which becomes unsafe

Employees shall not: -

- Be in possession of or traffic illegal drugs on company premises
- Report for work or return from breaks affected by alcohol or illegal drugs
- Consume alcohol or illegal drugs on company premises at any time, except where alcohol is specifically authorised by a senior manager for a specific social function
- Be in possession of, or use illegal weapons on company premises
- Smoke in the workplace or client site - Millennium Group has a no smoking policy in the workplace and in compliance with client site regulations. Employees who choose to smoke in their own time (in breaks, or before/after a shift) are required to cover their uniform and uniform logo and must comply with the site requirements, i.e., only smoke within designated areas away from public view and entrances. We strictly enforce our company smoking policy and employees who fail to adhere to this policy may be subject to disciplinary procedures.

Employees who are taking medication that could adversely affect their work performance or the safety of themselves or other employees shall immediately notify their manager to ensure that suitable precautions can be established and implemented.

Employees shall immediately report any damaged equipment, property or unsafe conditions to their manager.

3. Being Fair, Reasonable and Honest in All Dealings with the Company

Employees shall not steal company equipment, stock, cash, files, records or other property, nor pass confidential information belonging to the company or its clients on to a third party without prior authorisation.

Employees shall not deliberately mislead, defraud or assist another person to steal or defraud the company or their fellow employees.

Employees are permitted to participate in business related meals or functions with customers, suppliers, contractors or competitors. Employees shall exercise care to ensure that such functions have an underlying business purpose and that their value and frequency are not excessive.

Employees shall not accept loans from any persons or entities having or seeking business with Millennium Group. (This does not apply in the case of employees entering into loan arrangements with financial or other institutions in the ordinary course of their private business).

Employees shall not purchase items for personal use from vendors having or seeking business with the company, unless the value of such items is readily and objectively ascertainable.

The employee must pay for the item at a price equal to that value. An employee may accept a discount on such, only if the discount is readily available, as a trade custom to general industry.

Employees shall not misuse company or client assets, intellectual property or the services of Millennium Group employees (including contractors), for personal gain. This includes copying computer software programs, regardless of whether the programs are protected by copyright. Company letterhead must not be used when corresponding on personal or other matters not directly related to Millennium Group.

Employees shall not without the prior written approval of their manager undertake any appointment, position or work that: -

- Results in the employee competing with Millennium Group
- Otherwise adversely affects Millennium Group
- Adversely hinders the employee in discharging their normal duties with Millennium Group

Employees shall not be directly or indirectly engaged, concerned or interested in any other trade, business or occupation which is or may be in direct or indirect competition with any aspect of the business of the company, or adversely affect the performance of their employment duties or responsibilities to the company.

Employees shall not be involved in any act whether in relation to their employment with the company or otherwise which in the reasonable opinion of the company brings or might bring the reputation of Millennium Group or its clients into disrepute

Employees shall not make substantial investments in a competitor, supplier, or customer organisation without seeking prior written approval from their manager.

Employees shall inform their manager if they are charged with a criminal offence which is punishable by imprisonment, or if found guilty will adversely impact their ability to meet the inherent requirements of the position they hold with the company.

Employees shall notify their manager of any loss, suspension or change to a registration, accreditation, licence or other qualification that adversely affects their ability to meet the inherent requirements of the position they hold with the company.

Where deemed necessary by the company, employees shall be subjected to a properly conducted search of their workstation, files and locker.

At the company's request an employee can be directed to attend a doctor (nominated by the company) in order to undertake a medical examination to ascertain the employee's fitness or capacity to undertake their normal duties. Such an assessment may include an evaluation of whether the employee is under the influence of or affected by alcohol or any drug. In such circumstances, the employee agrees to provide or direct the doctor to provide the company with a copy of the medical report in respect of any such medical examination undertaken

4. Personal Benefit

Employees shall not use company or client information: -

- To gain improper advantage for themselves or others
- To cause harm to any person, the company or the board

Employees shall not use their position in the company to influence board members or other employees in the performance of their duty in order to gain advantage (either directly or indirectly) for themselves or any other person or body.

Employees will not seek (directly or indirectly) any gift, reward, inducement or benefit for themselves or any other person or body, in relation to their duties with the company.

Employees shall not receive stock or presents with a value of more than \$100, (except promotional items and samples) from a customer, contractor or supplier.

5. Properly Using Electronic Communication Facilities

Electronic mail facilities are to be utilised by all employees for principally business related purposes only. Access for the receiving or sending of personal messages is permissible provided that such usage: -

- Is kept to an absolute minimum
- Occurs at irregular intervals
- Does not include the running of any form of personal business

- Does not include the running of any form of personal activity (sporting Company, trade union etc)

All messages sent by electronic mail shall be structured in a format that is free from harassment, offensive/bad language, sexual references, or any other un-professional content. (This shall include sexually explicit messages, images, cartoons or jokes).

Electronic Internet facilities are to be utilised by employees for primarily business related purposes only. Access to the Internet for personal study/research is permitted provided that such usage: -

- Is initially approved by the employee's manager
- Is kept to an absolute minimum
- Is conducted during lunch-breaks or outside of normal working hours
- Does not include the downloading of MP3 (music) or streaming files
- Does not include logging into or using chat rooms while on-line

Employees issued with company credit cards are not permitted under any circumstances to utilise such cards in relation to gaming or subscriptions sites; or to purchase items via the Internet without prior discussion and approval from their manager.

Under no circumstances shall any of the company's electronic communication facilities be utilised by any employee for: -

- The intentional downloading, receiving, forwarding or storage of obscene messages, pornography or explicit images which may cause offence
- The making of derogatory, inflammatory, or discriminatory comments about another employee, supplier, or customer of the company
- The disclosure of private or confidential information about the company or an employee
- Any usage that is illegal, unethical or indecent
- Any usage that is detrimental to the company's professional reputation

Social Media

All employees during their employment, and even after their employment with the company, are subject to the company's policy on the use and content of material posted on social media networks, as it may refer to the company, its employees or the company's clients or their assets. Employees are therefore required to familiarise themselves and abide by the company's Social Media Policy. Employees should adopt a common sense approach to refraining on commenting or posting anything on social media sites related to their employment, the company or the company's clients. Failure to comply could result in disciplinary action and/or legal proceedings.

6. Minimising Waste and Expenditure

Employees shall minimise operating expenses wherever possible and make use of recycling facilities where provided.

Employees shall follow all company procedures designed to minimise waste or expenditure and actively participate in the company's "Go Green" program.

7. Showing Respect to Fellow Employees, Managers, Company and Client Property

At all times, employees shall display courtesy, respect, tact and patience when dealing with fellow employees and managers. Employees shall not: -

- Verbally or physically abuse or strike a fellow employee or manager, regardless of the provocation
- Use abusive language to deliberately cause offence, or to intimidate fellow employees or managers
- Provide the private address or telephone number of another employee or manager without their prior permission

Employees shall respect all company and client property and equipment and shall not deliberately or wilfully cause any form of damage or destruction.

Employees shall comply with all lawful directions that may be given by their manager or any person having the authority to give directions. Any employee who doubts the propriety of such an order shall refer the matter to their Area Manager or State General Manager. Employees shall follow the lawful policies of the company whether they agree with or approve of them or not

8. Maintaining a Professional Standard of Personal Appearance and Dress

Employees shall at all times maintain a neat and clean appearance and shall dress in a professional manner that is consistent with the company's Employee Dress Code or in accordance with issued uniform requirements, as outlined in the Human Resources Policies and Procedures Manual. Standards of appearance extends to personal grooming and hygiene – that is hair (including facial hair) should be neatly groomed, and long hair tied-back.

9. Being Open to New Ideas and New Ways of Working

Cleaning and Security are highly competitive industries where to sustain success, it is essential that the company is responsive to the needs of customers and changing market forces at all times.

This requires the company to continually identify and implement new systems or methods of work to keep pace with these demands. In this environment, employees are expected to be flexible in their approach, keeping an open mind to change, and being prepared to give new ideas a fair opportunity to succeed.

10. Communicating Openly and Working Cooperatively with Managers and Fellow Employees

Employees should willingly: -

- Provide open, constructive and honest feedback whenever views are sought on new initiatives or current methods of work
- Contribute ideas, suggestions or concerns and be prepared to accept the Company's response in an objective and constructive manner
- Accept constructive feedback from managers and fellow employees in a positive manner
- Follow appropriate instructions and work cooperatively with managers and fellow employees

11. Observing and Contributing to a Non-Discriminatory Workplace

Employees shall not discriminate against any other employee in relation to their:-

Sex, gender, disability/impairment, marital status, political and religious belief or activity, lawful sexual activity, race, breastfeeding, gender identity or sexual orientation, status as a parent or carer, age, physical features, pregnancy or potential pregnancy, industrial activity, irrelevant criminal record, irrelevant medical record, employment activity (i.e. making a reasonable request about employment entitlements) or personal association with a person who has any of these attributes

Or

Make unwelcome or discriminatory comments or take unwelcome or discriminatory actions against any other employee

Whether at work or attending Christmas parties, staff dinners, conferences or business trips, employees shall not engage in sexually harassing or offensive behaviour including but not limited to:

- Persistent, unwelcome demands of a sexual nature
- Sexually explicit or offensive letters, phone calls or email messages
- Requests for sexual favours
- Leering, patting, pinching, touching or unnecessary familiarity or physical touching
- Offensive comments about physical appearance, dress or private life
- Constant requests for drinks or dates especially after prior refusal
- Intrusive questions or comments about a person's private life or reference to a person's sexuality or physical appearance
- Visually displaying in the workplace derogatory objects, pictures or calendars
- Displaying screen savers containing any overtly sexual content

Employees shall not bully or physically harass another employee by: -

- Using physical intimidation to create fear in another employee
- Forcing another employee to participate in an "initiation" process
- Playing offensive or demeaning practical jokes on another employee
- Forcing another employee to undertake demeaning tasks

12. Personal Relationships

Millennium Group acknowledges that mutual friendships and relationships may develop at the workplace which are a private matter and as such do not constitute sexual harassment. Where such circumstances arise it is expected that: -

- There shall be no adverse impact upon the work performance of the employees involved, nor upon any other employee
- Employees shall not engage in any form of behaviour, which though it might be consensual, could interfere with the working environment or offend other employees. (This includes making public displays of affection, or engaging in excessive personal communication during work hours)

- At all times, employees are expected to act professionally and responsibly when at work or when representing the company
- Personal relationships shall be conducted in the employees' own time and external to the company's premises
- Neither employee shall divulge to the other confidential information that is not applicable to the performance of their particular positions within the company

13. Protecting the Commercial Interests and Reputation of the Company

Employees or managers shall refer all media enquiries regarding the company and its clients, its operations, products or services directly to the Area Manager or the State General Manager.

Employees or managers shall not accept media interviews in relation to the company or its clients, its operations, products or services without prior approval from the Area Manager or the State General Manager.

Employees or managers shall not accept public speaking engagements or write for external publications or services without receiving prior approval from their Area Manager or the State General Manager.

Breach of Standards

To ensure a fair and equitable working environment for all employees, the standards previously outlined form an expressed condition of your employment with Millennium Group. Breach of any of these standards or failing to follow other established policies and procedures within the company may lead to formal counselling or termination of employment, and/or the in case of fraud, theft, intellectual property, copyright, inventions, patents and clients, potential legal action being initiated.

14. Grounds for Instant Dismissal

(This list is not meant to be all-inclusive).

Employment may be terminated, without notice, for any of the following reasons: -

- Trafficking or possession of illegal drugs on company or client premises
- Stealing from the company, the company's clients or a fellow employee
- Physically striking or making threats of violence to a fellow employee, manager or a client
- Deliberately misleading or defrauding the company, the company's clients or fellow employees
- Reporting for work or returning from breaks affected by alcohol or illegal drugs
- Unreasonably refusing to undertake a properly conducted company drug or alcohol test
- Consuming alcohol or illegal drugs on company or client premises, except where alcohol is authorised for a social function by a senior manager
- Possession of illegal weapons on company or client premises
- Using severe abusive language towards fellow employees or managers
- Deliberately and wilfully damaging company or client property or equipment
- Serious and deliberate abuse of company electronic communication systems
- Serious and deliberate breach of company policy and procedures
- Wilful and deliberate neglect in performing tasks or procedures assigned to a position which could result in significant loss or damage to the company or a company client
- Abandoning employment without reason or notice

- Deliberately performing duties in a manner that may cause injury to the employee, other employees or managers

Breach of Standards

- Deliberately providing fraudulent, misleading, or inaccurate information upon application for employment with the company
- Severe cases of sexual or physical harassment or other forms of discrimination against a fellow employee or manager
- Deliberately and wilfully breaching the company's financial limits authority policy
- Deliberately and wilfully breaching company policy on control of expenses
- Deliberately releasing confidential information belonging to the company or the company's clients to a third party without prior authorisation

A Safe and Rewarding Workplace

Millennium Group will implement these policies and instructions in order to foster a safe and rewarding workplace for all of its employees. The company sincerely strives to provide you with a safe and rewarding workplace and wishes to acknowledge the important part you play in achieving this goal.

15. Whistleblower Program

Millennium Group has a whistleblower program that empowers employees and other stakeholders to play an active role in the elimination of improper conduct in the workplace.

The program is available in the event that the matter cannot be addressed through the standard lines of reporting and communication (i.e. Supervisor or line-manager), or is more appropriately addressed through the independent provider.

This program provides access to STOPline, a confidential, independent provider of whistleblowing services who will take full details of your concerns via telephone, mail, email, fax or this website. It is also important to remember our program enables individuals to maintain anonymity should they so desire.

STOPline is available to all Millennium employees, contractors or designated stakeholders and translation services can be provided if requested.

The program is available at;



<http://millennium.stoplinereport.com/>

All reports are investigated and anyone making a disclosure must be acting in good faith and have reasonable grounds for believing the information disclosed represents reportable conduct. Unsubstantiated allegations which prove to have been made maliciously, or knowingly to be false, will be viewed seriously with disciplinary actions applied as appropriate.