

millennium

**Employee Code of
Conduct Handbook.**

Updated 1 October 2023

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2. Background, Purpose & Scope

2.1 Background

The Millennium Services Group Ltd (henceforward referred to as Millennium; the Group and/or the Company) is a professional organisation providing cleaning, security, customer service and services to over 500 sites across Australia and New Zealand.

Millennium started as a Security services company in 2003 in New South Wales and grew steadily to provide class-leading security, cleaning and integrated services on the eastern and southern seaboard of Australia.

In 2015 Millennium expanded operations into New Zealand and listed on the ASX in November 2015 as Millennium Services Group Limited (ASX: MIL).

In late 2016, Millennium extended its service offerings to Western Australia as a result of its successful acquisition of the Airlite Group, a leading cleaning and integrated services provider based in Perth. In August 2017 Millennium expanded again by commencing operations in Tasmania.

Millennium understands the importance of providing clean, safe and secure environments for its Clients, the Community and Employees. Therefore, over the course of two decades, Millennium has consistently built its reputation for providing unparalleled service, attention to detail and care for all stakeholders. This has been achieved through a focus on four core values:

- **Service:** –
 - We care about the needs and expectations of our Clients and community and our people are driven to provide outstanding customer experiences.
 - Customer service is the focus of all our activities and is paramount to our ongoing success, so we always aim to exceed our Clients' needs and expectations.
 - We pride ourselves in our ability to respond to specific customer requests in the shortest and safest possible time frame, thereby building excellent customer relations.
 - We encourage Employees to seek out and identify opportunities to improve our customer service and to feel confident to bring their ideas to the attention of their Supervisor/Manager.
- **Teamwork:** –
 - We understand that working together, united as a team we are stronger and the safety and wellbeing of our people is our top priority.
 - Millennium recognises and appreciates the significant contribution that our Employees make toward the Company's ongoing success and profitability.
 - We value our workforce, and are committed to creating a team-based, collaborative working environment for all who decide to join us.
- **Accountability** – We take ownership for delivering results for our Clients.
- **Integrity** – We act ethically, maintain strong corporate governance and are transparent and respectful to all our stakeholders.

2.2 Purpose

As a people-driven organisation, it is imperative that Millennium is vigilant with ensuring all employees behave appropriately and perform to the standard expected. This is required in order to both meet the top-quality work expectations of Millennium's clientele as well as upholding the Group's mission, vision and set of values.

As such, the purpose of the Employee Code of Conduct Handbook (at times referred to as Handbook) is to detail how Millennium operates, outline the role each employee plays as part of driving Company-wide improvement, establish the Company's performance, behavioural, safety and ethical expectations and standards as well as demonstrate Millennium's commitment to always enabling open communication and provision of support.

The information contained in this Handbook is vital to assisting Millennium's Employees with upholding the values of the Company and protecting the interests of our Clients.

Therefore, Millennium requires Employees to thoroughly and independently review the Code of Conduct in full both prior to their commencement with the Company and throughout their employment. This is to ensure all Employees have an up-to-date understanding of, and continued compliance with the Handbook. As will be detailed throughout the Handbook, any breaches of Millennium's expectations and/or standards may result in retraining as well as disciplinary action, up to and including termination of employment.

2.3 Scope

The information contained in this Handbook is applicable to all Employees of Millennium, its divisions and its wholly owned subsidiaries throughout Australia.

The Employee Code of Conduct Handbook should be read in conjunction with several other significant documents. These include (but are not limited to) Employees' Letters of Offer, Millennium's suite of other Policies, Processes and Procedures as well as the training provided (either online or in-person) to Employees.

This document plays an important role both in the induction and day-to-day role of all Millennium Employees. As such, all Millennium Employees are required to carefully read, understand and agree to of all the content contained herein.

If any Employee has any questions, issues or concerns regarding anything contained in the Employee Code of Conduct Handbook, in the first instance they can contact their Supervisor/Manager and/or regional People and Culture Representative.

3. Working For Millennium

3.1 Millennium's General Expectations

As part of commencing employment with Millennium, all Employees are provided with a Letter of Offer as well as a copy of Millennium's Employee Code of Conduct Handbook.

These documents outline the general employment conditions with the Company and the expected workplace behaviours and standards. These documents together form the conditions of employment.

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

- Be committed to the job and to making a positive contribution.

- Work safely within the specifically posted and applicable area of responsibility.
- Maintain, provide evidence of (and if required, renew) all licences and certifications which are required for the Employee's role to be lawfully and proficiently completed. Additionally, an Employee must notify their Supervisor/Manager as soon as possible if a licence/certification has been suspended or cancelled and/or is in the process of being reviewed or not renewed.
- Be fair, reasonable and honest in all dealings with the Company and its Clients.
- Properly use electronic communication facilities.
- Minimise waste and expenditure.
- Show respect to fellow Employees, Managers and Company property.
- Maintain a professional standard of personal appearance and dress.
- Follow all lawful and reasonable managerial instructions and directions. In the event of an Employee having a concern about the safety or legality of a managerial directive, they must appropriately discuss the matter with the next-most senior Supervisor/Manager in the chain of command, the People & Culture Department and/or the contact Whistle Blower Program.
- Communicate openly and appropriately as well as working cooperatively with Managers, fellow Employees, Clients and all other stakeholders on-site.
- Observe and contribute to a non-discriminatory workplace.
- Act professionally at all times.
- Protect the commercial interests and reputation of the Company and its Clients.

In addition to reviewing, understanding and complying with the Code of Conduct, new Millennium Employees are expected to complete all induction forms and processes as well as induction training programs – whether for the Company or its Client(s).

3.2 Millennium's Expectations – Dress Code & Presentation

Given that most of our work is undertaken on Clients' premises and in many instances in contact with members of the public, it is vital that all Millennium Employees present in a manner that displays a professional standard of appearance and personal grooming.

Therefore, Millennium's dress code and presentation expectations include (but are not limited to):

- Wearing clean and well-maintained uniform (where a uniform is required).
- Wearing clean and well-maintained, professional clothing (where a uniform is not required).
- Wearing clean and workplace appropriate black footwear and socks.
- Ensuring hair (including facial hair) is well-groomed and of an appropriate length (where applicable).
- Maintaining the highest standard of bodily hygiene (including but not limited to the wearing of deodorant and/or perfume where appropriate).
- Ensuring body art is not visible. This includes (but is not limited to):
 - Tattoos, intentional scarification and/or body painting.
 - Piercings – such as nose, eye, tongue or lip rings and/or studs (this includes not wearing multiple earrings/studs).
 - Excessive amounts of jewelry, overly flamboyant jewelry, potentially unsafe jewelry and/or offensive jewelry.
 - Overly extravagant hair styles – such as Mohawks, Mulletts, Rattails and/or dyed hair.

3.2.1 Uniforms Requirements

Millennium is proud of our Employees and aspires for all people our Employees interact with, whether they be our Clients, other stakeholders or even members of the public, to receive a great first impression – which starts with how our team is dressed!

As such, Millennium's dress code includes additional requirements regarding uniforms.

These requirements include:

- Employees are issued with uniforms and equipment as is necessary for the performance of their duties in accordance with the operational requirements of their role.
- Employees are only permitted to wear their uniform while at work and/or commuting directly to/from their residence and work. This means that:
 - Employees are not permitted to wear their uniform/have their uniform visible before and/or after their shifts while on the Client's site as a customer (i.e. completing shopping).
 - Employees are not permitted to wear their uniform/have their uniform visible while in a licensed premises (unless for the express and authorised purpose of conducting work-related duties).
- While working, Employees are only permitted to wear/utilise Company-approved uniforms and equipment.
- Employees are responsible for all uniforms and equipment issued to them. This includes:
 - Maintaining the appearance of their uniform through washing and/or dry cleaning as required.
 - Potentially reimbursing the cost of replacing uniforms and/or equipment if lost, stolen or damaged (dependent on the circumstances).
 - Notifying their manager in writing (i.e. text message, email or letter, unless specifically authorised otherwise) as soon as is practicable (ideally within 24 hours) of the loss, theft or damage occurring to issued uniforms/equipment.
 - Employees must never loan their uniform and/or equipment to any person, nor may they ask to borrow uniforms/equipment from any other Employee or contractor without Millennium's explicit written consent.
 - In the event of another Employee, contractor or any external person asking to borrow an Employee's uniform/equipment, it must be professionally and politely declined and the Employee must notify their Supervisor/Manager immediately.
- Additional items of uniform and/or equipment may be issued by Millennium (at no cost to the Employee) if it is deemed that replacement is required due to normal and reasonable wear and tear.
- Upon termination or cessation of employment:
 - All Employees are expected to return all Company-issued uniforms and equipment in a reasonable condition (for example uniforms must be washed and dried and jackets dry-cleaned).
 - The return of all Millennium property must take place either on the final day of employment or as soon as is practicable after the final day of employment.
 - Failure to return all Millennium property may result in the delay of final pay processing (including outstanding pay and applicable entitlements).

3.3 Millennium's Expectations – Equipment, Keys & Property

Employees must understand and agree that:

- They are responsible for the safekeeping and security of equipment, keys and property provided by Millennium and/or the Client.
- Loss or damage caused as a result of an Employee's negligence may result in appropriate disciplinary action, up to and including termination.
- Outside of an emergency, only personnel explicitly authorised by Millennium and/or the Client are to be entrusted with any equipment, keys and/or property issued by Millennium and/or the Client.
- It is the Employee's responsibility to ensure that wherever required, all items of equipment are returned to the office and signed back in at the end of each shift. All equipment issued to Employees as part of their daily duties must be worn and maintained in line with the Company's uniform expectations.
- Equipment, keys and property must not be taken home or off-site for any reason

unless explicitly authorised by Millennium or in accordance with a written directive from the Client. In the case of keys or property being removed from site by accident, the Employee is required to return the item(s) to the site immediately. If returning the item(s) immediately incurs a cost, the Employee agrees that they are responsible for this cost.

3.4 Millennium's Expectations – Commitment to Role & Making a Positive Contribution

Our Company must remain dynamic, diligent and focused if we are to be successful. In this environment Millennium expects our Employees to:

- Be hardworking, punctual in attendance, conscientious, and committed to the Company's ongoing viability and success.
- Act in accordance with the requirements of applicable legislation, this Code of Conduct Handbook as well as Millennium's (and if applicable, the Client's) other policies, processes and procedures.
- Apply themselves diligently and exclusively to the discharge of their duties during working hours.
- Notify their Supervisor/Manager if any normally scheduled duties cannot be completed (or unforeseen issues have emerged and cannot be dealt with) prior to the end of the Employee's workday.
- When absent for any period of time due to illness, injury, carer responsibilities, or for any other applicable reason, personally notify their Manager as soon as practicable (preferably before the normal commencement time), of their intended absence and likely date of return to work.
 - In these situations, Employees are expected to provide adequate evidence (preferably a Medical Certificate, however Statutory Declarations are also accepted). Millennium requires that such evidence provides information regarding the expected length of leave and/or the date that the Employee will be fit to return to work.
 - If suitable evidence is provided, the Employee is entitled to, and has an adequate balance of Paid Personal/Carer's Leave (also known as "Sick Leave"), then they will receive the necessary time requested as paid leave until they are fit to return to work.
 - However, Employees must note that if suitable evidence is not provided and/or they are not entitled to Personal/Carer's Leave or their Personal Carer's Leave entitlement balance is insufficient, then the requested period off work will be processed as unpaid leave until the Employee is fit to return to work.
- Be aware that to ensure operational requirements can be met, Annual Leave must be requested as far as practicable in advance of the Employee's preferred period of leave.
 - Additionally, Employees must understand that Millennium has the right to refuse an Annual Leave request if the refusal is reasonable (for instance if the Company does not have the operational requirements to cover the leave period and/or lack of notice).
- Punctuality, Attendance and Recall:
 - Employees are required to arrive on time for the start of work and where applicable, are expected to be signed in, have all equipment on their person (i.e. radios, security licence) and have completed a handover/brief prior to commencing work.
 - If an Employee is running late for any reason, they must notify their Supervisor/Manager as soon as is practicable. Text messages are an acceptable form of communication.
 - Employees are required to make adequate arrangements to ensure that all shift-associated duties have been satisfactorily completed prior to leaving site.
 - Aside from situations of safety emergencies at site, Employees must not leave work prior to the conclusion of their rostered shift without explicit approval from a

Line Manager. Any unauthorised departure from site may result in disciplinary action, up to and including termination.

- Employees must understand that Millennium may reasonably request/recall them to work additional hours in order to cover shifts, for training or other site-specific requirements. Employees have the right to reasonably refuse this request.
- Employees must understand that although rostered on a weekly, fortnightly or monthly basis, they may be required to be flexible by fairly considering working shiftwork, weekends, public holidays and/or additional hours when requested in order to meet the Company's operating requirements.
- When provided with adequate training and support, work at a pace consistent with Employees of similar experience and skill, and not make repetitive mistakes or continual procedural errors.
- In the case of Senior and Managerial Employees, over a reasonable period regularly achieve key accountabilities and requirements as outlined in the applicable Position Description.
- In the case of Senior and Managerial Employees, over a reasonable period consistently manage their teams in a manner that reflects and reinforces the Company's identified values and beliefs as outlined in this document.

3.5 Millennium's Expectations – Security Specific

Due to the nature of the role, in addition to the expectations outlined in the Code of Conduct, there are Security-specific expectations for all applicable Employees. These expectations include:

- Security Employees will be issued with a Millennium Notebook and a pen which must always be carried on their person during their shift so that managerial/Client instructions as well as information and/or observations can be recorded.
- Security Employees must hold a current First Aid certificate and Security Licence (as well as any other applicable local accreditations) under the applicable State or Federal Law at their own cost.
- These accreditations must be valid at all times of employment with Millennium. If at any time the accreditations have been suspended or cancelled, the Employee must notify Millennium immediately.
- Security Employees must ensure that their personal details (i.e. home address) provided to the applicable Licencing Authority and Millennium are accurate and up-to-date at all times throughout employment.
- Should there be any mandatory renewal requirements (i.e. refresher training/modules) that are associated with the ongoing maintenance of an Employee's Security Licence, First Aid Certificate or other accreditations, the Employee is responsible for the cost and completion of this training in line with legislative requirements.
- Security Employees are required to always carry their Security Licence (as well as any site-specific equipment) with them while completing a shift.
- If or a full Security Licence has not yet been obtained, the Employee is required to carry their letter of acknowledgement from the Security Industry Registry (SIR) or, in Queensland, The Office of Fair Trading.
- Queensland-based Security Employees:
 - In Queensland, a Security Employee is not qualified to work in a Security Officer (or equivalent) capacity until they have received their official Security Licence.
 - As such, Queensland Employees are not permitted to work with only a letter of acknowledgement provided (also known as working "off receipt").
 - However, when renewing a Security Licence in Queensland, Employees may work "off receipt", so long as a hard copy of the original Security Licence (and acknowledgement letter) has been provided to Millennium, and once renewed, an updated copy of the Employee's licence is provided to the Company.

3.6 Millennium's Commitments to All Employees

In return for Employees meeting the Company's expectations, for all Employees, Millennium commits to:

- Provide competitive and fair remuneration.
- Create an environment where all Employees are treated with appropriate respect, dignity and courtesy.
- Be fair and reasonable in dealing with Employees' concerns or issues.
- Keep Employees informed about the Company wherever practicable, including regular communication on major issues and initiatives.
- Continually encourage Employee input and feedback on relevant Company programs and initiatives.
- Provide adequate facilities and equipment for work to be effectively completed.
- Provide the safest working environment practicable.
- Provide opportunities for training, development and career progression.
- Support employees' rights of freedom of association and right to join a union.
- Ensure all appropriate action is taken to effectively remove or isolate reported risks.
- Although Millennium usually tries to locate Employees at predominately one location, this is subject to operational requirements, Client requests and the Company's workload. As such, Employees may be required to work at alternative reasonable sites and locations. Millennium will, where possible, consider an Employee's residential address and endeavour to place them at the closest available site to their home.

4. People & Culture

4.1 The People & Culture Department

The People and Culture Department (sometimes referred to as Human Resources or HR) is responsible for coordinating and administering employment as well as providing support, advice and guidance for all Employees throughout their tenure with Millennium.

Some of the key services that the People and Culture Department provides include:

- Recruitment via Equal Employment Opportunity (EEO) and where applicable, completing onboarding and induction.
- Creating, distributing; interpreting and clarifying employment contracts.
- Training and development.
- Employee relations – including, but not limited to: encouraging Employee engagement; improving workplace communications; settling disputes and conflicts; preventing (where possible) harassment, discrimination and workplace bullying as well as (where required) conducting workplace investigations; clarifying the Company's policies, procedures and processes; clarifying conditions of employment; as well as monitoring overall Employee morale and performance.
- Industrial relations – including, but not limited to: ensuring the Company complies with all applicable legislation; clarifying legislation, Modern Awards and Enterprise Bargaining Agreements; communicating with applicable external bodies (such as federal-based bodies like the Fair Work Ombudsman/Commission, state-based governmental bodies, as well as Unions).
- Conducting performance and misconduct management and implementing the resulting outcome(s).
- Conducting internal communication and recognition programs.
- Consistently reviewing and improving internal Company policies, procedures and processes (and where necessary, creating new policies, procedures and processes).
- Collecting and analysing (non-personal) data for Company-wide improvements.
- Maintaining internal time and attendance as well as employee hub systems.

4.2 Performance, Misconduct & Abandonment of Employment

As outlined in Section 3, all Millennium Employees are expected to perform their duties as instructed and to the quality and standard required by the Company.

At any time should Millennium deem an Employee's performance or conduct to not be acceptable, the Company will implement the applicable course of action as per the Performance and Misconduct Management Policy.

The courses of action contained in the policy include the Performance Management Process (PMP), Performance Improvement Plan (PIP), Misconduct Management Process (MMP) and/or Abandonment of Employment Process (AoEP).

Failure to address the issues outlined in the above processes may result in the implementation of disciplinary action up to and including the termination of employment.

Further training is always available, and Millennium is always ready and willing to provide additional support, so Employees are strongly encouraged to contact their Supervisor/Manager and/or the People and Culture Department if they feel it would be beneficial.

4.3 Millennium's Systems

4.3.1 People Hub

People Hub is Millennium's online system for managing Employee-related processes and administration. This online hub serves as a digitised, standardised and streamlined "self-service" style hub for Millennium's Employees.

In People Hub, Employees can:

- Check and update information including (but not limited to):
 - Personal Details - email address, home address, mobile number, next of kin/emergency contact, resume (optional) and diversity information (optional).
 - Payment Details - banking, taxation, Superannuation (and other benefits).
- Review and accept employment contracts (sometimes referred to as Letters of Offer or LOOs).
- Complete training and learning activities as well as view training records.
- Review all "To Do" activities allocated by Millennium and/or the Supervisor/Manager.
- (For Office-based Employees only) Apply for leave and review leave balances.

It is particularly important for all Employees to utilise People Hub effectively to ensure that all the above listed activities are kept up to date.

Alongside the ability to update personal details, every Employee has access to the effective training content delivered by People Hub. All Employees are issued with a unique user access to assist with completing required job-specific training modules as well as further (optional) learning modules if the Employee wishes to advance in their role/career.

Feature of the self-service People Hub portal include:

- Simple user-friendly menus for PC or smart phone devices.
- Multiple-choice responses plus "Drag and Drop" options.
- Real time recording of module progress and completion.
- Certificates issued at completion of the modules.

Employees must note that it is their responsibility to ensure that their Employee Record on

People Hub is up to date. Examples of situations requiring Employee input include (but are not limited to):

- Any changes to an Employee's personal contact details (i.e. home address, phone number, email address), legal name, Right-to-Work status, licence information (i.e. driver's and/or security licence), emergency contact/next of kin details and/or medical information. Changes to any of the aforementioned information must be updated as soon as is practicable by logging into People Hub and adjusting the applicable information fields.
- Any changes to an Employee's banking, Superannuation and/or taxation details must also be updated in People Hub with a change notification email sent to the Payroll Department as soon as is practicable. Employees must understand that any delays with updating this information/notifying payroll may result in potential interruptions to their wage/salary/Superannuation payments.

4.3.2 Time & Attendance

For applicable Employees located on sites which have no automatic Time Clocks available, Employees are required to download and appropriately utilise the free mobile Time and Attendance Application (App) used by Millennium.

The Employee agrees to utilise their personal mobile device (or if applicable, the Company-provided mobile device) to clock on and off for their rostered shifts.

For more information about Millennium's Time and Attendance system they can contact either their Supervisor/ Manager or the People & Culture Team (via email: people@millenniumsg.com).

4.3.3 Communications

Millennium uses a range of communications approaches to inform and engage our team. Key communications channels include: a monthly staff bulletin, payslip messages, site posters, team briefings, toolbox talks (particularly for safety-related information), Site Operational Folders (particularly for Millennium's Policies and Procedures), email text messaging as well as face-to-face conversations.

For desk-based, administrative and management team members Millennium also shares information using the company intranet (MiPlace), email broadcast messages as well as the workplace social media platform Viva Engage (formerly Yammer).

Viva Engage is most used by State and Account Managers and Supervisors to promote and recognise team members' efforts and achievements.

4.4 Employees' Privacy

Millennium is committed to ensuring that Employees' personal information, including health information, is handled by the People and Culture Department in accordance with the Privacy Act 1998 (Cth) and any other relevant privacy legislation.

4.4.1 Data Collected by Millennium

When applying for a position or on commencement of employment with Millennium, Candidates/Employees are asked to supply information to enable the processing of the employment application and ongoing maintenance of employment. Generally, this information includes:

- Name, address and personal contact details.
- Date of birth and citizenship.
- Drivers Licence/Proof of Age information.
- Referee details.
- Passport and/or visa details (if applicable).
- Covid-19 vaccination information details (if applicable).
- Previous employment and qualifications details.

- Personal health (including existing conditions) details.
- Criminal history details.
- Next of Kin and/or Emergency contact details.
- Optional diversity information (including personally identified ethnicity and gender as well as country of birth).
- Tax File Number (TFN) and Superannuation information.
- Salary details.
- Bank account details.

Additional personal information will also be collected during each Employee's tenure with the Company, in order to manage the ongoing employment relationship. Examples may include time sheets, leave requests, medical certificates, performance appraisals, etc.

In most circumstances, personal information will be collected directly from the Employee.

4.4.2 Purposes of Data Collection by Millennium

The primary purpose for Millennium's collection of Employees' personal information is to process the initial employment application, to maintain Employee records and to administer salary and superannuation.

We may also need to collect Employees' information if the Company is legally or contractually bound to do so, such as under the Child Protection (Working with Children) Act 2012, or to check visa status through the Commonwealth's Visa Entitlement Verification Online (VEVO) service.

Personal information collected or held by Millennium will be used for managing processes associated with the employment relationship with the Company.

These activities may include the following:

- Recruitment, selection and appointment.
- Payroll processing.
- Superannuation administration.
- Workplace Health and Safety as well as Worker's Compensation.
- Staff training/development.
- Staff appraisals, probation and promotion.

Millennium may also use Employees' personal information in the following circumstances:

- In order to deal with management of grievances or disciplinary processes.
- For the recovery of debts.
- For insurance purposes and the management of work-related travel.
- For overall Company planning or for purposes required by legislation, for example Australian taxation legislation, employment legislation and immigration legislation.
- Other related People and Culture processes, such as reporting on workforce profiles in an aggregate non identifying format.
- In accordance with relevant Company policies and this Code of Conduct.

4.4.3 How Millennium Uses & Distributes Employees' Data

Millennium stores Employees' personal information in electronic format. The Company's security procedures and technological systems provide a rigorous security environment that restricts access to authorised staff only.

However, from time to time the Company may be required to disclose an Employee's information in circumstances such as:

- If required to do so by law. Examples of this may include (but are not limited to):
 - Subpoena, court order, Writ, a Worker's Compensation Commission, or other Commonwealth government agencies, such as the: Department of Human Services, Australian Taxation Office, Fair Work Commission, Commission for

Children and Young People, or their equivalents.

- If there are reasonable grounds to believe that the disclosure is necessary to prevent or lessen a serious and imminent threat to the life or health of any individual.

In the general course of business, Employees' personal information may be provided to: referees; Millennium's insurers; WorkCover; and/or Millennium's contractors, suppliers or service providers

No personal information about Employees will be released to the media by the People and Culture Department without the consent of the individual concerned.

4.4.4 How Millennium Stores Employees' Data

Employees have the right to access their personal information held by Millennium. Additionally, Employees are entitled to request that personal information held by Millennium is accurate and up-to-date, and therefore be amended accordingly.

The accuracy of personal information held by Millennium largely depends on the quality of information provided by the Employee. As such, the Company strongly recommends all Employees properly utilise the self-service People Hub portal.

Within the People Hub portal, Employees can request to make changes to, or access their personal information held in their personnel file in the first instance – without requiring input from the People and Culture Team.

However, should the desired information not be available (or cannot be altered) via the People Hub portal, Employees need to contact the People and Culture Department via email: people@millenniumsg.com. In this email, Employees are strongly encouraged to clearly:

- Advise Millennium that there are errors present which require the People and Culture Department to rectify and provide updated information.
- Formally request to examine the contents of their extended personnel file.
- Formally request copies of certain documents on their file.

If an Employee has a grievance about the way their personal information is being managed by Millennium, or have a question regarding privacy, they should contact the Company's Privacy Officer at: people@millenniumsg.com

4.5 Whistle-Blower Program (Stopline)

Millennium strongly believes that everybody is entitled to work in an ethical workplace, free from harassment, bullying, corruption and illegal activities. As such, Millennium has implemented a Whistle-Blower Program that empowers Employees, contractors and other designated stakeholders to play an active role in the elimination of improper conduct in the workplace.

The Whistle-Blower Program is available if the matter cannot be addressed through the standard lines of reporting and communication (i.e. Supervisor and/or Manager) or is more appropriately addressed through an independent party. Millennium's Whistle-Blower Program is facilitated by Stopline, a provider with 21 years of experience focused on support, hotline, investigation and forensic technology services.

For Millennium's Employees and stakeholders, Stopline is a confidential and independent whistle-blower service, where the full details of all concerns raised are noted and investigated. Through the Stopline service individual can maintain total anonymity should they so desire, and translation services can be provided if requested.



To reach the Stopline service, an individual can:

- **Call:** 1300 30 45 50
 - If the individual is deaf or has hearing difficulties, the NRS (National Relay Service) can be utilised – more information is available on the website (link below).
- **Email:** millennium@stopline.com.au
- **Post:** Attention – Millennium, c/o Stopline, PO Box 403, Diamond Creek, VIC 3089, Australia.
- **App:** By searching for *Stopline* in the iTunes App Store or Google Play.
- For more information, please visit: <https://millennium.stoplينerreport.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 that prove to have been made maliciously, or knowingly to be false, will be viewed seriously with the potential for disciplinary action up to, and including termination of employment and/or contract.

4.6 Training & Development

Millennium is committed to the training and development of its workforce for the mutual benefit of Employees and the Company alike to:

- Ensure a high standard of competence and effectiveness.
- Help Employees acquire a variety of skills and to provide greater job satisfaction.
- Assist Employees with planning and advancing their careers.
- Provide the Company with greater flexibility as well as enable the Millennium to meet business requirements efficiently and effectively.

As previously mentioned in Millennium's Systems, the Company offers flexible and effective training to Employees with the simple click of a button – anywhere, at any time through People Hub.

The Company provides training and retraining to all Employees wherever and whenever required. This training may be formal, internal or external in nature, but is all focused on assisting each Employee to maintain (as a baseline) and develop their level of skills/knowledge and competency.

4.7 Performance Reviews

Feedback about how Employees are performing their role is important as it promotes improvement, identifies skills gaps and corresponding training opportunities as well as communicates praise and to discuss further career opportunities.

This feedback may be informal and irregular, or formal such as scheduled annual performance reviews.

4.8 Communications, Suggestions & Ideas

Millennium understands that the Company's productivity, efficiency, and competitiveness are dependent upon the relationship we have with our Employees. It is imperative that we all share a common commitment to achieving the Company's mission and that we all work to a clear corporate vision that encompasses common standards.

To achieve these objectives, Millennium facilitates all Employees being regularly informed about new developments within the Company and provided with an ongoing opportunity to participate in decision-making processes and to provide comments, suggestions and opinions.

Employees, for their part, must feel confident and willing to contribute positively whenever the opportunity arises.

Millennium has established a series of formal and informal systems to keep Employees informed about the Company's goals, plans, financial achievements, staff changes and relationships with customers and suppliers.

These include:

- Publications (for instance staff memos and notices).
- Site-based Toolbox Talks.
- Millennium's Systems (as previously mentioned such as People Hub, MiPlace and Yammer).
- Managerial communications (such as emailed messages from Millennium Executive Managers, as well as informal site-based conversations with, or text messages from, Team Leaders).

Employees are strongly encouraged to keep themselves engaged and informed by reading their worksite's publications and noticeboards regularly and participating in meetings whenever the opportunity arises.

For Employees who do not have regular access to a PC or company phone, Millennium may, from time to time use the Employee's personal mobile phone number provided to the Company to enable important updates to be sent by text message.

4.9 Grievances & Issues

Any Employee who has a grievance, issue or concern is strongly encouraged to raise it appropriately. This can be done by:

- Initially, discussing the matter(s) with the immediate Supervisor/Manager who will endeavour to resolve the matter locally.
- Employees who feel that it is inappropriate to raise the matter with their immediate Supervisor/Manager (i.e. if the grievance/concern is about them) can contact the next appropriate person in the Managerial Line (for instance speaking with an Account Manager instead of a Site Supervisor). Again, this Manager will attempt to resolve the matter appropriately.
- If dissatisfied with the response received, the Employee can escalate the matter by referring it to the next level of management within the Company (i.e. State Manager who manages both Supervisors/Managers and Account Managers). Again, this Manager will strive to resolve the matter appropriately.
- If again dissatisfied with the response received from the Manager(s) above (or if wishing to raise a formal grievance at any stage), Employees have the option to contact the People and Culture Team directly to raise the matter formally. The Employee should note:
 - To lodge a formal grievance, the People and Culture Team will require a formal (written) statement outlining the grievance.
 - Any applicable evidence to be provided.
 - Confidentiality must be upheld to ensure a thorough and fair investigation can be undertaken.
 - The formal grievance must be sent via email to: people@millenniumsg.com.

When discussing a grievance, issue or concern, Employees have the right to request a suitable person to be present as their Support Person. Suitable Support Persons may include (but are not limited to) union representatives, (non-affected) colleagues, friends, family members or legal counsel representatives.

If requesting the presence of a Support Person, the Employee must ensure that Millennium has both a reasonable amount of notice (i.e. one business day) and the details of the Support Person (i.e. their name and relationship to the Employee).

Finally, the Employee must understand that the role of a Support Person is to provide support only. Therefore, the Support Person cannot speak on behalf of, argue for, answer any questions in place of, or provide evidence or a statement in support of the Employee.

4.10 Reconciliation Action Plan (RAP)

As previously noted, one of Millennium's core values is integrity, which means we are committed to doing the right thing, acting responsibly, ethically and being transparent and respectful to all our stakeholders.

Consistent with this driver, in April 2023 Millennium launched our first Reconciliation Action Plan (RAP) as part of our commitment to reconciliation in Australia. Developing and implementing a RAP also aligns with Millennium's ambition to meet and exceed Client and community expectations.

The Millennium website features a copy of the RAP (<https://millenniumsg.com/investor/reports-and-publications/>). Additionally, Employees who have any feedback, would like to know more about and/or get involved with the RAP can contact communications@millenniumsg.com.

4.11 Employee Assistance Program (EAP)

All of Millennium's Employees are entitled to utilise the Company's free, confidential and third-party (Assure Programs) operated Employee Assistance Program (EAP).

The EAP is a counselling, coaching and wellbeing support service led by qualified and experienced specialists to help Millennium's Employees (and their family members) at zero cost. The EAP can help manage and navigate the ups and downs of life. It is important to remember that the EAP's specialists are not just there to help in difficult times, but they can also help all Employees to proactively live life to the fullest!

The services provided by the EAP include (but are not limited to):

- **Coaching and Counselling** – Practical support and strategies to assist with a wide range of work, health and life issues.
- **Wellbeing Coaching** – Support and resources to assist with building positive and helpful behaviours.
- **Dietary Support** – Coaching and resources to assist with improving diets, managing weight and mitigating health issues.
- **Financial Coaching** – Assistance to deal with financial challenges and put positive fiscal strategies in place.
- **Legal Advice** – *Introductory* legal advice for any personal legal concern.
- **Manager Support** – Guidance and coaching on complex people and workplace issues.

The EAP can be contacted by:

- **Phone** – 1800 808 374 (Australia), 0800 808 374 (New Zealand).
- **Website** – www.assureprograms.com.au.
- **Mobile App** – the Wellbeing Gateway mobile application (available through Apple Store or Google Play – QR codes are shown below).
- The access code for support offered by Millennium is **MIL2834**.

Millennium **strongly encourages** all Employees to contact the EAP if they feel it would assist them.

EAP QR-access codes:

Apple Devices:



Google (Android) Devices:



4.12 Contacting the People & Culture Department

Employees who require specific advice or support that cannot be provided by their immediate Supervisor/Manager (or if applicable, their Managerial Line), as well as Employees needing to talk confidentially and independently should contact the People and Culture Department.

The best way to reach the People and Culture Team is via email: people@millenniumsg.com.

5. Payroll

5.1 Salaries and Wages

Dependent on the employing entity, wages or salaries are paid by Millennium either on a weekly, fortnightly or monthly basis.

Fortnightly pay cycles run Monday (week 1) to Sunday (week 2), with wages or salaries paid in arrears by Electronic Funds Transfer into the bank account(s) nominated on People Hub.

Monthly pay cycles run from the first to last calendar day of the month, with salaries paid two weeks in arrears and two weeks in advance on (or about) the fifteenth of each month via Electronic Funds Transfer into the bank account(s) nominated on People Hub.

For applicable Employees', wages are calculated on the basis of time and attendance records (either electronic or paper-based) which must be both signed on and off. Any Employee found signing on or off for another Employee (or altering time and attendance records in any way) may be subject to disciplinary measures, up to, and including, termination of employment with Millennium.

Millennium has the facility to make authorised deductions from Employees' pay (for instance to make extra voluntary payments to Superannuation, , health insurance as well as Police Checks). Employees wishing to arrange deductions should raise a pay query via their Manager, who will in turn, raise a query to Payroll.

5.2 Leave Entitlements

Millennium provides all Employees with the applicable Leave entitlements in line with the National Employment Standards (NES) as set out by the Fair Work Ombudsman. The NES refers to the 11 minimum employment entitlements that must be provided to all Employees in Australia. For more information, please contact the People & Culture Department and/or visit: <https://www.fairwork.gov.au/employment-conditions/national-employment-standards#nes-entitlements>.

Employees' pay slips provide up-to-date information in relation to current Annual Leave entitlement balance (this balance can also be located in the "Leave" section of People Hub). Employees should note that in accordance with the NES, Millennium does not (nor is required to) identify the balance of an Employee's Paid Personal/Carer's Leave entitlement (or any other leave entitlement's balance) on the Employee's pay slips.

In the event of any queries or concerns regarding leave entitlements, Employees should either reply to their pay slip or raise a query with the Payroll Department via email: payroll@millenniumsg.com.

5.3 Termination of Employment

Should an Employee choose to terminate their employment with Millennium, they are required to notify the Company in writing (for example via an email, text message or letter). Additionally, the Employee must ensure that they provide the required notice period as outlined in the relevant Industrial Award and/or as specified in their Letter of Offer.

Should circumstances arise whereby an Employee does not provide some or all of the specified notice, the Company will be entitled to deduct payment in lieu of notice from any outstanding payments due.

Upon an Employee's termination of employment (for any reason), all items that are the property of the Company no matter what their state or condition, are to be returned to the Employee's Manager (or representative) on the last day of employment. These items may include, but are not limited to:

- Keys, access keycards and/or IDs.
- Uniforms.
- Personal Protective Equipment (PPE) items.
- If applicable – electronic equipment, such as laptop, computer accessories (i.e. monitors, keyboard/mouse), mobile phone, tablet, radio, RCD.
- If applicable - vehicle (with keys), fuel card, toll tag and credit card.
- Any other items of Millennium's property provided throughout employment that remain in the Employee's possession.

5.4 Personal References

Employees should note that Millennium does not provide personal written references for any Employee.

However, upon a written application to the Payroll Department, the Company can issue a Certificate of Service/Separation Certificate that confirms the nature and period of employment with the Company.

5.5 Updating Personal Information

As covered by Section 4.3.1, Employees can update their personal information whilst employed by logging onto People Hub. All changes made on People Hub are automatically transferred to the Payroll Department – ensuring that all Employees' records are appropriately up-to-date.

To enable Millennium to process wages/salaries appropriately, it is particularly important for Employees to ensure that their banking, taxation and Superannuation details on People Hub are correct at all times.

Additionally, it is essential that Employees have their correct email address, home address, contact phone number(s), diversity information, next of kin and emergency contact details up-to-date at all times for both Millennium's continuing smooth operation as well as in case of an emergency involving the Employee.

5.6 Contacting the Payroll Department

As previously covered, in the event of any pay queries or concerns, Employees should initially raise a pay query with their Manager (who can then raise it with the Payroll Department).

Alternatively, Employees can contact the Payroll Department directly via email: payroll@millenniumsg.com.

6. Health, Safety, Wellbeing & Environment

6.1 Employees' Health, Safety & Wellbeing

At Millennium, we are dedicated to the ongoing safety and wellbeing of our Employees. We consider health and safety to be an integral component of our day-to-day business operations and encourage Employees to actively participate in all aspects of Workplace Health and Safety.

When using Company or Client equipment, Employees must always exercise care and follow the operating instructions to prevent injury, and/or maintenance and replacement costs. In carrying out normal duties, Employees must always:

- Observe all safety regulations and consider their own safety and of the safety of fellow Employees.
- Utilise designated Personal Protective Equipment (PPE) and safety equipment available.
- Not smoke on Company or Client 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 that is unsafe, or which can become unsafe.
- Understand and comply with all Millennium and Client Workplace Health and Safety policies and procedures.

Employees must immediately report any damaged equipment, property, or unsafe conditions to their Manager / Supervisor and to the Safety Team. For further information, please refer to Millennium Hazard & Incident Reporting Procedure, accessible via the link: [Hazard & Incident Reporting Procedure](#).

6.2 Safety Training

Safety training forms an integral part of our workplace operations. Millennium subscribes to the view that 'Employees don't know how to do their jobs unless they know how to do them safely'. The Company is committed to training Employees in Workplace Health and Safety.

Training needs are to be communicated to our Senior Managers, should there be a request for training to assist in performing duties in safer way. Training initiatives are reviewed annually to ensure the required competency levels are achieved.

Training contents are distributed to Employees online via the People Hub platform, delivered face-to-face (in toolbox format) and/or (where required) via approved external organisations for specific training or for high-risk work license requirement. Employees' participation and engagement in applicable training is critical. Employees may be required to sign-off at the end of the training to demonstrate their completion of the course and understanding of the material.

Employees are required to complete the Millennium induction sheet, the Client-based site- specific induction (if applicable) and the Millennium M2m training program as part of probationary period requirements. All the mentioned inductions must be completed within the first month of employment within the company.

Records of training will be maintained onsite at Employees' work locations, and a copy must be provided to the Safety team via email at safety@millenniumsg.com upon completion. Where an online platform is utilised by Millennium for training, acknowledgment and assessment will be captured via the system. Toolbox acknowledgement must be completed and submitted to the Safety team.

Millennium frequently operates in a public facing role. As such, it is important for all Employees to be aware of the hazards and risks at the workplace as well as the controls available to reduce the consequences of an incident as much as is reasonably practicable. Below are some common hazards that are identified for awareness.

6.2.1 Manual Handling

Manual handling is any activity involving lifting, lowering, pushing, pulling, carrying, or otherwise moving, holding or restraining an item. Almost all tasks required by Employees to complete involves some degree of physical effort. Millennium aims to minimise manual handling tasks wherever practicable by the provision of suitable mechanical devices. Where manual handling is required, Employees are required to understand and apply the directions in the Work Instructions and follow the simple rules outlined below.

DO:

- Use safe lifting techniques:
 - Always carry loads close to the body.
 - When lifting, the spine should maintain its natural curved shape – the strong upper leg muscles should take the weight in place of the spine.
 - This will usually require bending the knees, positioning the load closely and correctly, as well as getting a secure hold.
- Use any mechanical aids available i.e. lifting trollies, buggy.
- Do warm up and stretching exercises prior to lifting.
- Get assistance - team lifting reduces weight of the load being lifted.
- Have regular rest breaks.

DO NOT:

- Lift heavy weights.
- Lift awkward loads alone.
- Bend and twist whilst lifting or carrying heavy loads.
- Lift above shoulder height.
- Carry a load away from the body i.e. carrying at arm's length.

For further information, please refer to Millennium's [Manual Handling Procedure](#).

6.2.2 Interactions with Non-Compliant Members of Public (MOP)

As a front facing Employee, there are times where interactions with an aggressive or threatening individual may occur. In all circumstances our Employees' safety is the most important priority to Millennium, immediately followed by others' safety. As such, if it is safe to do so, help other people vacate from the area immediately. If it is not safe to do so, Employees must remove themselves from the aggressive situation to a safe location.

Millennium has strict hands-off procedures when it comes to a non-compliant, aggressive, or threatening Members of the Public (MOPs). As part of this hands-off stance, Employees must:

- Always retreat to safety when dealing with a non-compliant, aggressive or threatening MOP.
- Never pursue offenders.
 - If an Employee undertakes a pursuit in contravention of Millennium's direction, they do so at their own risk and peril – Millennium does not sanction such pursuits and as such, the Company's insurer may elect not to accept any claims arising from injuries sustained during such pursuits.
- Where assistance is requested from a Client, Tenant, Customer or other MOP for an

alleged shoplifting or theft offence, Employees may only provide assistance in the form of a physical presence only whilst the Client/Tenant/Customer/MOP performs the citizen's arrest.

- Never detain persons based on suspicion of committing an offence (i.e. theft).
- Never place themselves or others in immediate danger through actions which may result in physical danger, injury or arrest.
- Never engage in an incident or act in any manner that could be construed as reckless whilst performing their duties on site.
- Act in a professional manner at all times and never put themselves in a position where they could bring Millennium, the Client or a Tenant into disrepute.

6.2.3 Machinery

Under no circumstances should Employees attempt to operate any form of machinery for which they have not been adequately trained, nor feel confident to use. Employees must never reach under, through or over any guard and must always know how to stop any machine that they are operating before commencing use. Employees must not ever try to fix any machinery problems themselves – instead, any breakdowns or defects must be reported to the applicable Supervisor or Manager immediately.

If a machine or item of equipment has been tagged as: 'don't operate' or 'do not remove', the Employee must contact their Supervisor or Manager to determine why the machine or equipment has been tagged and whether it is safe to be activated for use (i.e. they must never attempt to start or use themselves). Only trained and authorised Employees are permitted to operate security apparatus on site.

Where a piece of equipment or a plant is used, they are to be safely stored at a secured location or power is turned off before leaving the area.

6.2.4 Hazardous Substances

During the course of work, Employees may come into contact with a variety of substances including chemicals used in cleaning and sanitation, gases such as ammonia and fuels like propane which can all be safely used, provided the correct handling procedures are followed.

These handling procedures include (but are not limited to):

- Reading the product label together with the Safety Data Sheet (SDS). In the event of a SDS not being provided, a copy must be requested from the applicable Supervisor or Manager.
- Avoiding eye and skin contact and wearing the Personal Protective Equipment that has been issued.
- Never eat, drink, or smoke when handling any chemical as well as washing hands after chemical use.
- Avoiding inhaling chemical fumes and dust.
- Never mixing chemicals unless instructed and trained to do so.
- Dispensing chemicals into clean and properly labeled containers only.
- Always returning chemicals to the appropriate storage area – chemicals must never be stored in direct sunlight or near heat sources.
- Ensuring chemicals are sufficiently banded at all times when being stored.
- Always reporting any major spillages immediately.
- Cleaning up spillages using the correct procedures. If unsure how to complete this appropriately, Employees must request training in spillage cleaning from their Supervisor or Manager.
- Always disposing of empty containers as instructed.
- Understanding the actions to take in the event of an accident.

Note: If at any time an Employee experiences any sensitivity or allergic condition, they must report it to their Supervisor or Manager **immediately**.

6.2.5 Slip, Trip & Fall

Worksite environments may contain hazards which could cause a slip, trip or fall and pose a risk of injury to Employees and/or others if not identified and controlled correctly. It is the responsibility of all Employees to ensure that any hazards which may cause an incident by slipping, tripping or falling are identified, reported and controlled to lower the risk to as low as reasonably practicable.

Millennium Employees must ensure that:

- Spills are cleaned up immediately.
- Signage is used when conducting tasks which may leave liquid residue on the walking surface.
- Non-slip shoes are worn at all times, with all Employees regularly checking the soles of their shoes to ensure there is sufficient tread.
- All work areas are to be kept clean and tidy and ensure all walkways are kept clear.
- Whilst ascending and descending stairs that 3 points of contact is used at all times.
- No electronic devices are used whilst walking.
- All cords, cables and hoses are stored away neatly at all times.

All forms of slips, trips and falls must be immediately reported to the Site Supervisor. If the slip, trip or fall involves or relates to a Member of the Public, the Supervisor must complete a Public Liability Incident Report form and ensure it is submitted via email (to incidents@millenniumpg.com) within 24 hours of the incident occurring.

6.2.6 Repetitive Work & Job Rotation

The nature of work performed can sometimes involve repetitive tasks and movements. Millennium has implemented job rotation practices whereby Employees change work tasks regularly (as far as operational requirements permit) to help reduce the potential for repetitive work injuries. Job rotation also provides variety of work, an increase in skill and greater job satisfaction.

Employees are requested to undertake muscular warm-up exercises when commencing work or returning from breaks. If suffering from any shoulder, wrist or hand irritation, discomfort, or pain Employees must report this to their Supervisor or Manager immediately.

6.2.7 Personnel Protective Equipment (PPE)

As far as reasonably practicable, Millennium designs its work procedures and physical working environments to minimise workplace hazards. To further mitigate hazards, we also provide Personal Protective Equipment (PPE) to all Employees. PPE can include (but is not limited to): earmuffs, ear plugs, face shields, goggles or safety glasses, safety boots, rubber gloves, hi-vis vests, and face masks.

Upon commencement of employment or transfer to another site, the applicable Supervisor or Manager will advise an Employee regarding how to obtain, correctly use and replenish PPE suitable for the work specific area.

For Employees' own protection, it is a condition of employment that all PPE issued is always worn and used appropriately. Failure to comply with this requirement may lead to disciplinary proceedings – up to and including the termination of employment.

6.2.8 Safety Signs

Safety signs are used on all of our sites to draw Employees' attention to issues. The five types of signs in place on Millennium sites must always be obeyed. Failure to comply with this requirement may lead to disciplinary proceedings – up to and including the termination of employment.

The five types of signs in use are in relation to:

- Hazard Management.
- What to do in an Emergency.
- Safety Requirements.
- Personal Protective Equipment.
- Site Rules.

6.2.9 First Aid & Emergency Personnel

First Aid kits are restocked regularly and are located at all sites serviced by Millennium. Employees are strongly encouraged to provide the Company with the details of their emergency contact person, should additional notification or follow up is required to be made. Supervisors/Managers will provide additional emergency contact details for the site(s) where Employees are engaged.

6.2.10 Emergency Evacuation Procedure

It is essential that all Millennium Employees are familiar with the evacuation procedures for the site(s) where they are engaged.

Copies of site evacuation plans and procedures are usually available on the notice board in the site's break room for quick reference.

6.2.11 Visitors & Contractors

When permitting entrance to a visitor and/or contractor to a Millennium-controlled site, it is the responsibility of the applicable Employee(s) to ensure that the visitor/contractor is signed into the Visitors' Book and that a Visitor Pass is provided and worn.

Further, visitors and contractors must be made aware of, and comply with, site safety policies and requirements. Visitors may also include Employees from other sites or offices, members of the public, VIPs, Employees' family members (including children), and/or customers. Where required, approvals must be obtained to permit entry and Client specific site induction must be completed.

6.2.12 No Smoking Policy

Millennium has a no smoking policy in the workplace.

Millennium defines smoking as the practice in which a substance is burned, inhaled (and/or chewed) and the resulting smoke/vapour is breathed in and/or absorbed.

This definition covers and includes:

- The act of lighting, smoking and/or carrying a lit or smoldering cigar, cigarette, or pipe of any kind.
- All forms of electronic nicotine delivery systems or electronic smoking devices (such as e-cigarettes/vapes, e-pipes, e-hookahs, and e-cigars).
- All forms of chewed nicotine delivery systems (such as chewing tobacco).

For proven health benefits, Millennium encourages Employees not to smoke. However, for Employees that choose to smoke, they must:

- Do so in their own time (i.e. in breaks or before/after commencing work).
- Appropriately cover their uniform and uniform logo.
- Must comply with all site requirements (i.e. only smoke within designated areas away from public view and entrances).

The Company's smoking policy is strictly enforced and Employees who fail to adhere to this directive may be subject to disciplinary action up to, and including, termination of their employment.

6.2.13 Alcohol, Other Drugs & Weapons

Millennium is committed to maintaining a safe and healthy workplace for all Employees, subcontractors, Clients, and visitors, enabling them to perform their work in a productive manner, which does not jeopardise their own safety or the safety of others.

It is unacceptable for any Millennium Employee to attend the workplace under the inappropriate influence of Alcohol and/or Other Drugs or with any form of weaponry (including illegal weapons and/or legal items that may be used as weapons).

Millennium strictly prohibits the possession, use, sale and transfer of Alcohol and Other Drugs as well as any form of weaponry during work time or (where applicable) outside of work time on Millennium worksites. If an Employee engages in any of these activities, it may be considered gross misconduct which may attract disciplinary action up to and including termination. Employees must note that they agree to Millennium's right to conduct random Alcohol and Other Drug testing and/or random on-site personal property searches where required.

Millennium Employees must not:

- Be in possession of, or traffic illegal drugs on Company or Client premises.
- Report for work or return from breaks affected by alcohol or illegal drugs.
- Consume alcohol or illegal drugs on Company or Client 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 drugs on Company premises.
- Smoke inappropriately in the workplace or on the Client's site – smoking may only occur during authorised breaks and in compliance with Millennium's and the Client's site regulations.
- Breach the smoking policy in the workplace.

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

For further information, please refer to Millennium's [Alcohol and Other Drug Policy \(Australia\)](#).

Under no circumstances are weapons (whether legal or illegal), or articles that may be used as a weapon to be brought onto any Millennium site. These items may include, but are not limited to: guns, bombs, pepper spray, knuckle dusters, restraining devices (such as handcuffs or zip locks), knives/blades (including swords), unnecessary tools (including Leatherman/Swiss Army multitools, axes, hatchets and screwdrivers), kubatons, blunt objects (including extendable batons, bats, clubs) as well as chemical, nuclear, and/or biological weapons.

Any Employee who becomes aware (or suspects) that any colleague(s) may be under the influence of alcohol and/or other drugs, as well as that alcohol, other drugs and/or weapons have been brought onto the site, must immediately report the matter to their Supervisor/Manager or any other senior Millennium representative.

Any Employee who brings alcohol, other drugs and/or weapons onto a Millennium site may be subject to disciplinary action, up to and including termination. Further, the matter may be reported to the Police and/or other relevant external authorities.

6.3 Incident Reporting

6.3.1 What Incidents Must be Reported

Hazards, Incidents, and Near Misses must be reported to Millennium immediately or as soon as it is safe to do so. The definitions of Hazards, Incidents, and Near Misses are:

| Type of Incident | Description |
|------------------|--|
| Hazard | A situation or thing that has the potential to cause harm to people, property and/or the environment. |
| Incident | An inclusive term for any event, accident, injury or occupational illness that occurs as a result of work, or the work environment which has had an adverse effect on people, property and/or the environment. |
| Near Miss | A work-related incident where no injury or ill health occurs, but where the incident had the potential to cause injury or ill health. |

6.3.2 What are Notifiable Incidents

Notifiable incident is an incident which is required to be reported to a WHS Regulator (i.e. WorkSafe Regulatory). Notifiable incidents include:

- The death of a person
- A serious injury or illness of a person
- A dangerous incident

6.3.3 What are Serious Injuries or Illnesses

Serious illness or injury means an injury or illness requiring the type of treatment indicated in Millennium Hazard & Incident Reporting Procedure.

An injury or illness requiring a person to have:

- Immediate treatment as an in-patient in a hospital.
- Immediate treatment for:
 - An amputation of any part of the body.
 - A serious head injury.
 - A serious eye injury.
 - A serious burn.
 - The separation of skin from an underlying tissue (such as degloving or scalping).
 - A spinal injury.
 - The loss of bodily function.
 - Serious laceration.
- Medical treatment within 48 hours of exposure to a substance.
- Any infection related to carrying out work.

6.3.4 What is a Dangerous Incident

An incident that exposes an Employee or any other person to a serious risk to health or safety emanating from an immediate or imminent exposure to:

- An uncontrollable escape, spillage, or leakage of a substance.
- An uncontrolled implosion, explosion, or fire.
- An uncontrolled escape of gas or steam.
- An uncontrolled escape of a pressurised substance.
- Electric shock.
- The fall or release from a height of any plant, substance, or thing.
- The collapse, overturning, failure, or malfunction of, or damage to, any plant that is required to be authorised for use in accordance with the regulations.
- The collapse or partial collapse of a structure.
- The collapse or failure of an excavation or of any shoring supporting an excavation.
- The inrush of water, mud, or gas in workings, in an underground excavation or tunnel.
- The interruption of the main system of ventilation in an underground excavation or tunnel an uncontrolled implosion, explosion, or fire.

Note: Includes any other event prescribed under a regulation, but is not reflected above.

6.3.5 How to Report

All Employees must notify their Supervisor/Manager of all incidents either immediately, or as soon as it is safe to do so. The Supervisor/Manager is responsible for initial assessment of the incident and for escalating the matter to the applicable Manager(s) (i.e. Account Manager and/or State Manager) in accordance with the Millennium Incident Notification and Escalation Process.

All hazards, incidents and injuries are to be reported to Millennium Safety within 24 hours. Any Employee who has sustained an injury or illness at work can contact the Millennium Safety Team for further support.

The Millennium Safety Team can be contacted via email (safety@millenniumsg.com). Once contacted, a member from Millennium's Safety Team will reach out to assist further. Incident notification can also be completed by Employees and provided directly to the Safety Team if required.

For further information, please refer to Millennium Hazard & Incident Reporting Procedure, accessible via: [Hazard & Incident Reporting Procedure](#).

6.4 Millennium's Return-to-Work (RTW) Program

Millennium has a Return-to-Work (RTW) Program in place and is committed to returning injured Employees to the workplace in a safe manner. This is achieved by means of identification, assessment, and control of workplace risks to prevent workplace injury or illness along with an effective investigation of workplace incidents with a view to mitigate and where possible eliminate the risk so far as reasonably practicable.

6.4.1 Work-Related Injury/Illness

A work-related injury/illness is an injury or illness that arises in the course of, or in connection with, an Employee's duties, and to which, work is the main contributing factor. In the event of an Employee sustaining a work-related injury or illness, they may be entitled to receive compensation via Millennium's Workers' Compensation Insurers.

All reasonable measures will be undertaken to prepare a RTW plan which may include modification of duties and in some situations, relocation of work site. This will be done in consultation with multiple parties, including, but not limited to: the Employee; any Employee representative; Nominated Treating Doctor; RTW Coordinator; Employee's Supervisor and/or Manager; Rehabilitation provider; and Workers' Compensation Insurer. Employees must actively participate in, and agree on a RTW plan as well as work within any restrictions/modified duties specified, unless otherwise specified.

For further information, please refer to Millennium's [Injury Management and Rehabilitation Procedure](#).

6.4.2 Employee Rights

An Employee's RTW rights include:

- To be able to nominate a treating doctor of their choice.
- To be provided with employment that is both suitable and, so far as reasonably practicable, the same as or equivalent to their pre-injury employment.
- To be consulted and involved in identifying suitable work and developing their recover at work plan.
- To be provided with privacy and confidentiality.
- To be provided with access to mechanisms for resolving complaints and disputes.

6.4.3 Employee Obligations

All Employees during a RTW program have an obligation to:

- Notify Millennium as soon as possible after a work-related injury occurs.
- Participate and cooperate in establishing an injury management plan.

- Carry out the actions such a plan requires of them.
- Authorise their nominated treating doctor to provide relevant information to their insurer and/or Millennium via the certificate of capacity, claim form or other form of authority.
- Make all reasonable efforts to recover at work.

6.4.4 Non-Work-Related Injury/Illness

A non-work-related injury/illness is an injury or illness that is not related to work and did not occur in the course of employment.

For any non-work-related medical conditions impacting an Employee's ongoing employment, the Safety Team (along with the RTW Coordinator) will support the Employee to remain at or return to, work so long as a suitable role is available. To be deemed suitable, the remain at/return to work role must be:

- Light or suitable duties which are available, practical, and meaningful.
- A value-add role for both Millennium and the Employee.

6.4.5 Employee Responsibilities

Employees have a duty to take reasonable care of their own health and safety and a duty to take reasonable care that their acts or omissions do not adversely affect the health and safety of other persons.

To that end, an Employee must:

- Comply with safety procedures and directions as agreed between Managers/Supervisors and the relevant Work Health and Safety Committee.
- Comply with Millennium procedures for accident and incident reporting, and reporting of potential and actual hazards, as soon as reasonably practicable after they become aware of any hazard.
- Not willfully interfere with, or misuse items or facilities provided by Millennium in the interests of ensuring workplace health and safety and protecting the welfare of Employees.
- Notify their immediate Supervisor/Manager of any work-related injury/illness within the same shift that an incident has occurred or within 24 hours and to promptly provide ongoing medical advice/medical certificates and rehabilitation status.
- Notify their immediate Supervisor/Manager of any non-work-related injury/illness when the following occurs:
 - Where there is a non-work-related condition that may affect an Employee's ability to perform any function of their inherent job requirements, and or may be at risk of aggravation should they return to their substantive role.
 - When an Employee is provided with work restrictions for a non-work-related medical condition by a medical professional. This may include restrictions of hours or duties.
 - Have a medical condition that may have resulted in a permanent disability or inability to perform a substantive role.
 - Have a long-term medical condition that may require permanent or long-term adjustments to work arrangements, duties, and or special considerations for duties to be safely performed.
- Promptly complete and provide all relevant documentation regarding their workplace injury / illness.
- Participate in the agreed RTW plan to the best of their ability whilst adhering to medical restrictions both at work and at home.
- Take reasonable care in the performance of work to prevent work-related injuries to self and others.
- Cooperate with Millennium to ensure Injury Management obligations are met.
- Promptly report all absences relating to any work-related injury and provide supporting medical certificates.
- Keep their Supervisor/Manager informed of the condition of their injury and the progress of injury management.

- Undertake all the activities agreed to as part of their RTW Plan.
- Cooperate in reasonable workplace changes designed to assist rehabilitation.
- Attend medical and other treatment appointments advised by the Employee's nominated treating doctor.
- Obtain regular medical information in the form of progress medical certificate regarding fitness for work and injury status.
- Adhere to restrictions outlined by the nominated treating doctor in the RTW Plan.

6.4.6 Fitness for Duties

At Millennium's request for fitness for duties assessment, an Employee may be directed to attend a doctor in order to undertake an independent medical examination (IME) 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 allows the IME doctor to provide to Millennium) a copy of the IME report in respect of any such medical examination undertaken.

6.4.7 Dispute Resolution

Millennium has a dispute resolution process that can be implemented if a RTW dispute arises. In the event of a RTW dispute, every attempt will be made by Millennium and applicable representatives to quickly resolve the disagreement(s) and ensure continued effective injury management for the injured or ill Employee.

For further information, please refer to Millennium's [Injury Management and Rehabilitation Procedure](#).

6.5 Personal Information

As per Section 4.4 (Employees' Privacy) of this Code, there will be times where an Employees' personal information will be requested by the Safety Representative for Worker's Compensation or Incident Investigation purposes.

Employees will be requested to complete a consent form and any personal information gathered will be used as confidentially as is practicable and only as is required. This may include disclosure of the information to any WHS Regulatory bodies or authorised investigating officer.

6.6 Employee Assistance Program (EAP)

As per Section 4.11 – Employee Assistance Program (EAP), free, confidential and independently provided support is available to all Millennium Employees.

Millennium believes it is particularly important that Employees who have been the victim of, or witness to, a traumatic event (i.e. assault, self-harm) utilise this avenue to seek assistance from Millennium via the services offered by the EAP.

Millennium, a Millennium Supervisor/Manager and/or the Safety Team may initiate critical incident support for Employee(s) through the EAP. However, it is the affected Employee's decision to continue utilising the EAP service.

The contact details for the EAP can be found in Section 4.11 of this Code.

6.7 The Environment & Community

Millennium considers responsible environmental management to be an integral part of day-to-day business operations throughout the Company. As such, Employees should try to minimise the environmental impact wherever possible and make use of recycling facilities where provided.

Similarly, Millennium endeavors to conduct its business in ways that will:

- Protect the health and safety of its Employees, Clients, Suppliers and the general public.
- Continuously improve its awareness and management of environmental issues in order to reduce any adverse impacts upon the environment.
- Consistently promote and implement cleaner production and best practice environmental management throughout all aspects of its operations.
- Providing training on, as well as encouraging and driving Employees to follow all Company procedures focused on minimising waste and environmental harm.

Millennium is always open to receiving ideas and feedback from our Employees. As such, the Company encourages all Employees to seek out and identify opportunities to improve our environmental management and to feel confident when raising their ideas to the attention of Managers/Supervisors and/or the Safety Team.

7. The Way We Work at Millennium

7.1 Fairly, Reasonably & Honestly

Millennium believes that it is important for all parties (including Employees, contractors, other stakeholders and the Company) to behave fairly, reasonably and honestly in the workplace.

As such, it is vital that Employees understand that they:

- Must not steal Company or Client 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.
- Must not deliberately mislead, defraud (or assist another person to steal or defraud) the Company, its Clients or their fellow Employees.
- Appropriately handle lost property. This includes any lost property provided to, or found by the Employee through the completion of their duties. Such property must be logged in the lost and found register appropriately. At no time is any Employee to remove any unclaimed/lost property without the express written permission of the appropriate Supervisor/Manager and/or Client.
- Unless explicitly authorised, must not speak for, or on behalf of Millennium, Millennium's Clients or Agents of Millennium.
 - This requirement exists both at work as well as outside of work (for example on social media and/or if approached by traditional media outlets).
 - If an Employee who is unauthorised to speak on behalf of Millennium is ever asked to make a comment, they must politely decline and immediately report the matter to their Supervisor/Manager as well as the People and Culture Team.
 - Employees must never provide confidential statements or any form of information to any person outside of their normal chain of managerial command without authorisation.
 - Except as required by law, Employees must never make any representation or give any undertaking with regard to blame or liability for issues with, or associated with, the premises to which they have been appointed or assigned to work. If any incidents arise, the matter should be directed to Millennium Senior Management or the Client (if appropriate) for further consideration and management.
 - Except as required by law, Employees must never make any statements, representations or convey any opinions about blame or liability to the Client, Tenants, Media or other third parties.
 - The Millennium brand/logo must never be copied or used on any document unless authorised by a member of the Millennium Executive.
- Must never permit an unauthorised entry to any area of the Client's property, including a site office, Security or Cleaning lunchroom, Security Manager's or Cleaning Manager's office, or any other area of the Client's property without the explicit written permission of Millennium and/or the Client. An unauthorised person

may include, but is not limited to former Employees, family members (including children), contractors or other persons not employed or engaged by or the Client. This direction applies prior, during and after all rostered hours performed.

- Must exercise significant care during permitted business-related meals or functions with customers, suppliers, contractors or competitors to ensure that such events have an underlying business purpose and that their value and frequency are not excessive.
- Must not offer or accept cash in hand, gifts, or rewards for work performed. Further, any offers of cash in hand, monetary payments, gifts and/or rewards made to an Employee must immediately be reported to the applicable Supervisor/Manager.
- Must not accept loans from any persons or entities having or seeking business with Millennium.
 - 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.
- Must 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.
- Must pay for an item at a price equal to its value – for example an Employee may only accept a discount if the discount is readily available to the general public.
- Must not misuse Company or Client assets, intellectual property or the services of Millennium 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.
- Must not, without the prior written approval of their Supervisor/Manager, undertake any appointment, position and/or work that:
 - Results in the employee competing with Millennium.
 - Adversely affects Millennium.
 - Adversely hinders any Employee in discharging their normal duties with Millennium.
- Must not entice other Employees to leave Millennium (whether for a competing organisation or not).
- Must not aid or assist a fellow Employee or any other person onsite with any form of unauthorised, negligent or unlawful activity. Failure to comply with this direction may result in disciplinary action being taken, up to and including termination, as well as referral to the Police/relevant external authorities.
 - If an Employee becomes aware of another Employee's participation or planned participation in any form of unauthorized, negligent and/or unlawful activity onsite, they must immediately notify their Supervisor/Manager.
 - Information received by any Employee will, wherever possible and as far as is practicable, be treated in the strictest of confidence.
- Must 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.
- Must 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 or its Clients into disrepute.
- Must not make substantial investments in a competitor, supplier, or customer organisation without seeking prior written approval from their Supervisor/Manager.
- Must 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. At the Company's request or for the purposes of complying with a Client's contractual requirements, the Company may direct an employee to undergo a Police Check.
- Must notify their Supervisor/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 their role.

- Must adhere to a properly conducted search of their workstation, electronic equipment, files, locker and/or any other items of Company property, when such a search is deemed necessary by the Company.

7.1.1 Personal Benefit

Employees must 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.
- Use their position in the Company to influence Board members or other Employees in the performance of their duty to gain advantage (either directly or indirectly) for themselves or any other person or body.
- 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.
- Receive stock or presents with a value of more than \$100, (except promotional items and samples) from a customer, contractor or supplier.
- Solicit work from Millennium's Clients or the Customers of Millennium Clients.
- Divulge confidential information obtained during employment to any external parties and/or for any personal gain.
 - Confidential information can include (but is not limited to) all onsite activities, meetings, investigations, incidents, Client information as well as any information whatsoever of a confidential nature (whether provided verbally or via a documented format) which relates to Millennium or its entities. This includes, but is not limited to business ideas or concepts, business plans or projections, market research and marketing plans, finances, personnel of the Company, Clients, business partners or associates, intellectual property rights licensed to or by, or owned by the Company and concepts not reduced to material form and any combination of such information in documents or otherwise.

7.1.2 Working Hours & Coverage

Millennium understands that from time-to-time, operational requirements will mean that our Employees may be asked to work additional hours, extend their shifts, or perform modified duties that fall within the description of their role.

The Company acknowledges that Millennium can only request or require an Employee to work more than their maximum weekly hours where the additional hours are reasonable.

Employees can refuse to work overtime that unreasonably exceeds their maximum hours. In these circumstances, Millennium will work with Employees.

7.2 Proper Use of Electronic Communication Facilities

7.2.1 Acceptable Use of Company IT Resources

Millennium believes that it is in the best interest of both the Company and Employees for the best possible resources to be made available so that productivity is enhanced. As such, Millennium provides Employees with a wide range of Information Technology (IT) resources including, but not limited to mobile phones, tablets, computer systems, software, internet access, data, networks and cloud-based computing.

It is vitally important for Employees to understand the established guidelines for the acceptable use of Millennium's IT resources so that the security, integrity and proper utilisation of these resources (by authorised individuals) is ensured.

The acceptable use of IT resources guidelines include:

- **Access** – Millennium's IT resources are to be used exclusively by authorised

individuals who have been granted access by the Company.

- **Password Security:** –
 - Employees must have a robust and secure password that cannot be easily guessed and is not used for other non-Millennium applications.
 - Employees must safely store passwords that grant access to Millennium's systems and/or information.
- **System Updates** – Employees are responsible for keeping Company-provided systems used for accessing Millennium's resources up-to-date with security updates provided by approved vendors.
- **Security:** –
 - Employees must not attempt to bypass or circumvent the Company's security controls or protection mechanisms.
 - Employees are responsible for safeguarding Company data from unauthorised access, loss, or theft.
- **Prohibited Software** – Employees must not introduce malicious software (including, but not limited to viruses, worms, ransomware and/or trojans) and must not use hacking tools to gain unauthorized access into the Company's IT environment.
- **Responsible Usage:** –
 - Employees must not access, distribute, store, or display illegal, pirated, or offensive material.
 - Employees are prohibited from using Company IT or network equipment for unauthorised personal usage (including financial or commercial gain).
 - Employees must ensure that personal usage of Company resources for non-commercial purposes remains within reasonable limits and does not impede on the Employee's performance and/or Company's goals.
 - Employees should refrain from engaging in activities that excessively consume network bandwidth in any way shape or form.
 - Employees are obligated to promptly report any security incidents, potential vulnerabilities, or suspected breaches to the relevant departments.
- **Equipment and Hardware:** –
 - During Employment: –
 - Only Millennium (and where required, Client) approved and authorised electronic equipment may be brought to site by an Employee. This includes (but is not limited to), laptops, tablets, webcams, drones or any other electrical device which is not the property of the Client or Millennium.
 - Any information associated with the operation of security systems, computers and closed-circuit television (CCTV) is not to leave the Client's premises unless explicitly authorised by both Millennium and the Client.
 - There is to be no removal or destruction of any image or electronic report from computers and CCTV recorders, be it DVR, CD, USB, cloud based, video or any other connection device without the explicit written authorisation of Millennium and the Client.
 - CCTV footage, images, electronically downloaded material including documents or emails are not to be copied, distributed, or discussed without the express approval of Millennium and the Client.
 - No Client or Millennium information or images are to be discussed or posted on social media or any internet platform or site.
 - Upon Termination – Employees are required to return all Company-owned devices in a functional state before their departure.
 - Replacement (During Employment) – Employees are required to return any replaced IT equipment to the IT department if it is deemed to be in suitable condition for repurposing, unless agreed otherwise.
 - Reallocation – Employees must notify the IT Department in writing if they intend to reallocate Company owned assets to a different person or site.
 - Disposal – Employees must follow the appropriate IT data disposal process when discarding or recycling storage media or devices.
 - When Overseas – Employees must notify and seek approval from the relevant

authority if it is their intention is to use the Company's IT resources outside the expected designated geographic location.

- Special Cases – Employees may use personal devices for work-related tasks only in special cases where it has been approved.
- **Company Data** – Encryption, where applicable, should be used to protect sensitive Company data during transmission and storage.
- **Email** – Should be utilised by all applicable 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 personal activity such as sporting company, trade union etc.
- **Content** – All messages sent using Millennium's IT resources must be free from harassment, offensive/ bad language, sexual references, or any other un-professional content. This includes sexually explicit messages, images, cartoons or jokes.
- **Internet Access** – Is 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 lunchbreaks or outside of normal working hours.
 - Does not include the downloading or streaming of music or video files (unless otherwise authorised).
 - Does not include logging into or using online chat rooms.
- **Company Credit Cards & IT** – Employees issued with a Company credit card 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 Supervisor/Manager. Employees must ensure that the usage of Company credit cards on IT equipment:
 - 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 (i.e. sporting company, trade union).

Under no circumstances may Millennium's electronic communication facilities be utilised by any Employee for:

- The intentional downloading, receiving, forwarding or storage of obscene messages, pornography or explicit images or any other images which may cause offence.
- The making of derogatory, inflammatory, or discriminatory comments about the Company, other Employee(s), Supplier(s), or Client(s)/Customer(s) of Millennium.
- The disclosure of private or confidential information about the Company, its Clients or an Employee.
- Any usage that is illegal, unethical or indecent.
- Any usage that is detrimental to the Company's professional reputation.

While employed with Millennium, all Employees must understand and unconditionally agree that:

- Millennium reserves the right to access, review or inspect all physical and electronic Company-issued (or Client-issued) equipment – including the available records of said equipment.
- Millennium and/or the Client may record their actions where overt surveillance cameras are installed at the worksite.
- Millennium and/or the Client may use, review, distribute or rely upon the

aforementioned information in determining breaches of policy, disciplinary proceedings, evidence in court, legal action and/or resolving disputes.

7.2.2 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, 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 Millennium's [Social Media Policy Statement](#). The policy statement directs Employees to:

- Post with care – be aware that if declaring association with Millennium and/or the Client's site, what is posted will reflect on the Company.
- Not post images of themselves or their colleagues in Millennium or Client branded uniforms.
- Not post images of their colleagues without their express permission.
- Not make derogatory comments about the Company or the Client's worksite.
- Not participate in arguments or debates on social media regarding the Company or the Client's worksite which may reflect on either in a negative manner.
- Always maintain confidentiality regarding the Company and the Client's site.
- Not make comments that could be considered discriminatory, bullying, defamatory, or inappropriate to Millennium or others

It is vitally important that all Employees understand that failure to comply with Millennium's Social Media Policy Statement could result in disciplinary action up to and including termination, as well as potential legal proceedings.

7.2.3 Use of Mobile Phones at Work

Outside of authorised breaks and appropriate break areas, Employees are not permitted to use their personal mobile phone for any activity (including answering incoming calls, making outgoing calls, utilising internet-based applications or playing games).

A personal mobile phone may be used if an emergency or safety issue arises or if the Employee is unable to contact their Supervisor/Manager due to radio issues.

In the event of an Employee expecting a personal phone call regarding a family and/or health emergency (which would require the Employee to answer their phone while on duty), the Employee must notify their Supervisor/Manager prior to commencing their shift.

7.3 Behaviour and Respect

Millennium believes all Employees are entitled to be treated equally and that merit is the basis for all employment, promotion, training, transfers and the benefits of employment.

7.3.1 Communicating Openly & Working Cooperatively with Supervisors/Managers & Colleagues

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.

Millennium condemns all forms of discrimination and harassment. Such behaviour is unacceptable and will not be tolerated under any circumstances. The Company is

committed to providing a safe and productive work environment free from discrimination and harassment, for all Employees. Employees will display courtesy, respect, tact and patience throughout all interactions with fellow Employees, Supervisors/Managers, Suppliers, Clients, other stakeholders and members of the public.

Employees must never:

- Verbally or physically abuse or strike a fellow Employee, Supervisor/Manager, Supplier, Client, other stakeholder or member of the public – regardless of the provocation.
- Use abusive language to deliberately cause offence, or to intimidate fellow Employees, Supervisors/Managers, Suppliers, Clients, other stakeholders or members of the public.
- Provide the private address or telephone number of a fellow Employee, Supervisor/Manager, Supplier, Client, other stakeholder or member of the public without that person(s) express prior permission.

Employees must respect all Company and Client property and equipment and must not deliberately or willfully cause any form of damage or destruction.

Employees must 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 may refer the matter to the next Line Manager and/or the People and Culture Team (via the Stopline Whistle-Blower Program).

Employees must follow the lawful policies of the Company, whether they agree with or approve of them or not.

7.3.2 Observing & Contributing to a Non-Discriminatory Workplace

Employees must not discriminate against any other Employee in relation to their:

- Sex.
- Gender and/or Gender identity.
- Intersex status.
- Sexual orientation.
- Lawful sexual activity.
- Marital status.
- Status as a parent or carer (including breastfeeding requirements/responsibilities).
- Family or carer's responsibilities.
- Pregnancy or potential pregnancy.
- Medical record.
- Physical features.
- Physical or mental disability/impairment.
- National extraction.
- Race.
- Colour.
- Age.
- Political opinion.
- Social origin.
- Criminal record.
- Religion.
- Industrial activity.
- Employment activity (i.e. reasonable query about employment entitlements).
- Personal association with a person who has any of the above attributes.

All Millennium Employees are strongly encouraged to report all forms of discrimination to their Supervisor/Manager immediately. Any discriminatory or inappropriate action may lead to a period of standdown during an investigation – which may result in disciplinary action being taken by Millennium, up to and including, termination of employment and potentially, referral to applicable external authorities.

7.3.3 Sexual Harassment & Sex-Based Harassment

Sexual harassment is an unwelcome sexual advance, unwelcome request for sexual favours or other unwelcome conduct of a sexual nature which makes a person feel offended, humiliated and/or intimidated, where a reasonable person would anticipate that reaction in the circumstances.

Sex-based harassment is any unwelcome conduct of a seriously demeaning nature by reason of the person's sex in circumstances in which a reasonable person would have anticipated the possibility that the person harassed would be offended, humiliated or intimidated.

Whenever at or around work (including attending Christmas parties, staff dinners or other functions, conferences or business trips), Employees must not engage in conduct that is sexual harassment or sex-based harassment or any other offensive behaviour including but not limited to:

- Persistent, unwelcome demands of a sexual nature.
- Sexually explicit and/or offensive communications (including, but not limited to text messages, online messaging, social media posts, emails, phone calls and/or letters).
- 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.

All Millennium Employees are strongly encouraged to report all forms of sexual harassment to their Supervisor/Manager immediately. Any form of sexual and/or sex-based harassment may lead to a period of standdown during an investigation – which may result in disciplinary action being taken by Millennium, up to and including, termination of employment and potentially, referral to applicable external authorities.

7.3.4 Personal Relationships

Millennium 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, Millennium expects 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, but is not limited to, engaging in public displays of affection and/or 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 positions within the Company.

7.3.5 Bullying & Harassment

Bullying and harassment includes, but is not limited to circumstances where an Employee:

- Practices or promotes verbal or physical harassment in relation to another Employee's protected attributes (as outlined in Section 7.3.2).
- Uses physical or verbal intimidation to create fear in another Employee.

- Forces another Employee to participate in an 'initiation' process.
- Plays offensive or demeaning practical jokes on another Employee.
- Forces another Employee to undertake demeaning tasks.

It is important to note that:

- Bullying refers to repeated behaviour, rather than a one-off incident.
- Reasonable Managerial Action is not bullying. Reasonable Managerial Action refers to a Supervisor's/Manager's ability to make decisions about poor performance, take disciplinary action as well as direct and control the way work is carried out.

All Millennium Employees are strongly encouraged to report all forms of bullying and harassment to their Supervisor/Manager immediately. Any form of bullying and/or harassment may lead to a period of standdown during an investigation – which may result in disciplinary action being taken by Millennium, up to and including, termination of employment and potentially, referral to applicable external authorities.

7.3.6 Reporting Discrimination, Sexual Harassment, Bullying & Physical Harassment

Any Employee who believes that they have been subject to actions or words that may be discriminatory or that constitute unwelcome sexual or physical harassment should act as soon as possible by notifying their Supervisor or Manager.

Should the Employee feel that reporting via their Supervisor/Manager is inappropriate, they may reach out to a superior Line Manager, Millennium's People and Culture Team and/or the Stoplevel Whistle-Blower Program (details available in Section 4.5).

7.3.7 Children & Vulnerable Person Safety & Interaction

This directive applies to all Millennium Employees on applicable sites. In general, physical contact with children or vulnerable people is to be avoided unless there is a legitimate reason for such contact, or the contact is an expectation of the service provided.

DO:

- There may be circumstances where children or vulnerable people may initiate more intimate greetings such as hugging, and this should be sensitively discouraged.
- Use non-invasive greetings commonly accepted in the community such as handshake, fist-bump or high five to respond.
- First Aid should be administered in the presence of another adult (preferably one known to the child or vulnerable person) unless in an emergency and the delay in getting another adult would jeopardise their safety.
- Contact Police if a lost child, or vulnerable person, is not claimed by a Parent or Guardian within a reasonable period of time. This may vary depending on the age of the child or the time of day/ night etc. Never remove a child from the premises/site unless necessary for the child's own safety and welfare.
- If confronted with a situation of an older child threatening harm with a weapon, seek immediate assistance from security or Police, rather than attempting to disarm them.
- Avoid being alone with a child or vulnerable person in any location that is not in visual contact with another adult, unless there is legitimate reason for doing so, for their own safety and welfare.

DO NOT:

- Remove items of clothing from a child or vulnerable person's body unless necessary for their immediate safety and/or to prevent serious harm (e.g. to administer first aid).
- Use language that is derogatory in any way towards others in the presence of colleagues or customers including children or vulnerable people.
- Announce lost children or vulnerable persons names over the P.A. System (note: please refer to the standing instructions of the Client in the first instance as they may

require the naming of the child as part of their procedures).

- Enter the Parent's Room unless required to as part of normal work routines and when authorised by Millennium management and/or the Client. In these situations, Employees must always try to conduct any work while the Parent's Room is empty or advise the occupants of the necessity of their presence and respect the Parents' privacy.

7.4 Modern Slavery Policy

Millennium recognises that human rights concerns can arise not only in our own operations, but also via interactions with external parties – in particular our business relationships, customer interactions, supply chain management and the communities we serve.

The Company's Modern Slavery Policy applies to Millennium, its divisions, its wholly owned subsidiaries, its Employees and our supply chain. Millennium understands and accepts its legal responsibilities and has implemented policies and procedures in line with the Modern Slavery Act 2018. These policies and procedures are continually reviewed and improved.

7.4.1 Management Responsibilities

Millennium management will:

- Conduct business in a way that respects the rights and dignity of people, and avoids complicity in human rights abuses, while complying with legal and regulatory requirements which incorporate the protection of human rights.
- Avoid causing or contributing to adverse human rights impacts through Millennium's own business activities and address such impacts if they occur.
- Have systems and processes in-place to mitigate the risk of slavery and human trafficking within its supply chain and apply checks where higher-risk areas are identified.
- Not practice, tolerate or support the following forms of slavery in any form: –
 - Slavery, servitude (coercion to provide services) and forced and/or compulsory behaviour.
 - Human trafficking (arranging or facilitating the travel or movement of a victim with a view to them being exploited).
 - Committing any offence with the intention to commit human trafficking.
 - Aiding and abetting, counselling and/or procuring any of the above offences.
- Only use specified, reputable employment agencies to source labour, ensuring all employees have a right to work and are therefore protected by employee legislation.
- Ensure our employees, Clients and suppliers are aware of this policy using both verbal and written communication.

7.4.2 Employee, Supplier & Subcontractor Responsibilities

Millennium employees, suppliers and subcontractors will:

- Abide by the requirements of this policy, as per the above management responsibilities.
- Conduct business in a way that respects the rights and dignity of people, and avoids complicity in human rights abuses, while complying with legal and regulatory requirements which incorporate the protection of human rights.
- Avoid causing or contributing to adverse human rights impacts through Millennium's own business activities and address such impacts if they occur.
- Raise any concerns and report any actual or suspected modern slavery at Millennium or our business partners either to the appropriate line manager, Human Resources Department or via the Millennium Whistle Blower program (Section 4.5).
- Any suspected breach of this policy will be investigated, and any person found to be in breach may face disciplinary action (up to and including termination) as well as being reported to the relevant authorities.

8. Millennium Key Contacts

- **Employee Assistance Program (EAP):** www.assureprograms.com.au
- **Stopline (Whistleblower Service):** millennium@stopline.com.au
- **Payroll Team:** payroll@millenniumsg.com
- **Health, Safety, Wellbeing & Environment Team:** safety@millenniumsg.com
- **Compliance Team** (for Public Liability, Property Damage and Motor Vehicle Incident Reporting): incidents@millenniumsg.com
- **People & Culture Team:** people@millenniumsg.com
- **Head Office Administration Team:** admin@millenniumsg.com
- **Communications Team:** communications@millenniumsg.com