

# CODE OF CONDUCT POLICY



## Message from the CEO

We are committed to working transparently and maintaining high standards of ethical behaviour in the conduct of our business. We are accountable to our clients, communities, and employees for conducting our business in a manner which is safe, respectful, legal and sustainable.

Our Code of Conduct reflects and builds on these principles and guides our behaviour, empowering us to make ethical decisions in all aspects of our business.

Our Code of Conduct upholds our reputation for stepping up and leading the way, taking pride in what we do and how we do it, working transparently, applying professionalism, integrity and maintaining a positive and constructive work environment.



Adam Machon  
**Chief Executive Officer & Managing Director**  
MPC Kinetic Holdings Limited

Date: 21 April 2023

## Application of the Code of Conduct

We expect all employees to behave in accordance with the principles stated in this Code of Conduct. We expect our suppliers, business partners, subcontractors and vendors to act in a manner consistent with our code of conduct. At the same time, when we work with our clients and business partners, we respect and comply with their codes of conduct.

### Safety

We work safely in everything we do, looking after the health and wellbeing of our people, clients, contractors and visitors by:

- » Working together safely with the goal of “no harm”
- » Working free from the influence of any substance that could prevent us from conducting our work safely and effectively

### Quality

We look to improve what and how things are done and challenge the status quo in all parts of our business. We are committed to meeting and exceeding our client’s expectations for sustainable quality by:

- » Being rigorous in our work so it is correct, complete and consistent
- » Building systems and processes that allow our staff to do more with less, think differently in all of our solutions, communicate and work together effectively

### Sustainability

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We recognise that sustainability requires the perpetual creation of environmental, social and economic outcomes. This ensures ecosystems are maintained, communities thrive and society prospers; now and in the future. We demonstrate sustainability by:

- » Having the passion to create positive environmental, social and economic impacts in all aspects of our business
- » Promoting environmental protection and improvement through our activities and services, by providing sustainable. solutions, using resources effectively, and minimising waste
- » Ensuring;
  - company property; funds, tools, equipment, vehicles, facilities and services are used only for authorised purposes
  - our contractors cause no damage to community-owned or private facilities
- » Caring, valuing and respecting the rich diversity of cultures and traditions of local and indigenous communities

## Global Compliance

We comply with all laws and respect the customs and business practices of the countries in which we work.

## Responsibility and Accountability

We honour our commitments, take responsibility for all matters over which we have control, and are accountable for the results and consequences.

## Respect in the workplace

We maintain a supportive, professional and positive workplace environment by:

- » Appreciating the unique skills, experience and talent of each individual
- » Treating everyone with courtesy, fairness and respect
- » Individually and collectively striving to keep our workplace free from harassment, bullying, violence and discrimination
- » Creating a diverse and vibrant work environment that is open, challenging and enjoyable
- » Encouraging employees to enhance their professional and personal development, to reach their full potential and to make a difference

## Relationships

We know the power of team work and build relationships based on trust, honesty, integrity and respect. We work transparently, collaborate and openly share experience and knowledge. We do not allow behaviour that could harm the reputation or relationships we have with our communities.

## Confidentiality and Privacy

We understand and respect the sensitive and confidential nature of the information that we are provided, in our roles and do not release this information without appropriate consent, unless required to do so by law.

We also respect and protect the privacy of personal information of our employees and others who work with us.

## Fairness, Integrity and Honesty in our dealings

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We establish and maintain professional relationships with our clients, sub-contractors, suppliers, vendors, business partners and others, based on mutual respect, integrity and honesty by:

- » Prohibiting acts of corruption, bribery or improper influencing of decision makers
- » Respecting that gift giving and providing entertainment is an important business practice, while using careful judgment to ensure that we do not offer or accept such benefits when the situation could either reasonably be perceived to create an obligation or would be in breach of the recipient's policies
- » Gifts and Hospitality should never be accepted by employees in circumstances where the outcome of may be influenced or give rise to the perception that the transaction may be influenced by the gift
- » Avoiding any situation that creates or appears to create a conflict of interest and informing clients of known or perceived conflicts of interest
- » Competing fairly and ethically and offering services on the basis of our qualifications and experience
- » Observing applicable laws regarding political contributions, activities and lobbying

Employees must be aware of, and adhere to all company policies and comply with relevant legislation.

## **Work Ethic**

We all influence outcomes, we take pride in what we do and how we do it.

When conducting business, we:

- » Act with integrity, professionalism and be scrupulous in the use of company information, funds, equipment and facilities
- » Exercise fairness, equity, courtesy, consideration and sensitivity in dealing with customers, employees and other stakeholders
- » Promote the interests of the company
- » Perform their duties with skill, honesty, care and diligence, using authority in a fair and equitable manner
- » Abide by the policies and procedures, instructions and lawful directions that relate to their employment and duties
- » Comply with the spirit as well as the letter of the code of conduct

## **Breaches of the Code**

If you are aware of a situation that you believe may raise concerns under our Code of Conduct, you should promptly bring the matter to the attention of your manager, HR representative, an Associate, Board member or via the "Your Call" hotline.

Any employee, who in good faith, makes a complaint or disclosure about an alleged breach of the code, and follows the reporting procedure, will not be disadvantaged or prejudiced in the making of such a complaint or disclosure. All reports will be treated as confidential.

Employees found to be in breach of the Code of Conduct will face disciplinary action, and where warranted, dismissal.

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If you are unsure as to what behaviour may constitute a breach of this Code, please consult your immediate supervisor for advice before signing.

### Employee Acknowledgement

I have read, understood and comply with the Company's Code of Conduct

Name: \_\_\_\_\_

Signed: \_\_\_\_\_

Date: \_\_\_\_\_

### Supplier, consultant, subcontractor or business associate Acknowledgment

The undersigned acknowledges that they have read, understood and comply with the MPK Code of Conduct while working with us.

Name: \_\_\_\_\_

Signed: \_\_\_\_\_

Date: \_\_\_\_\_

Title: \_\_\_\_\_

Company: \_\_\_\_\_