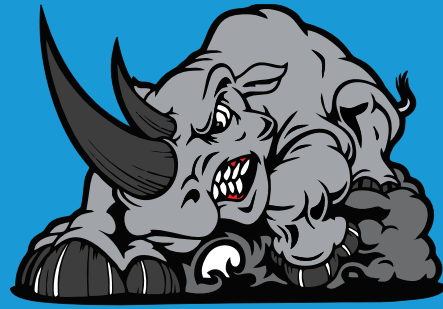
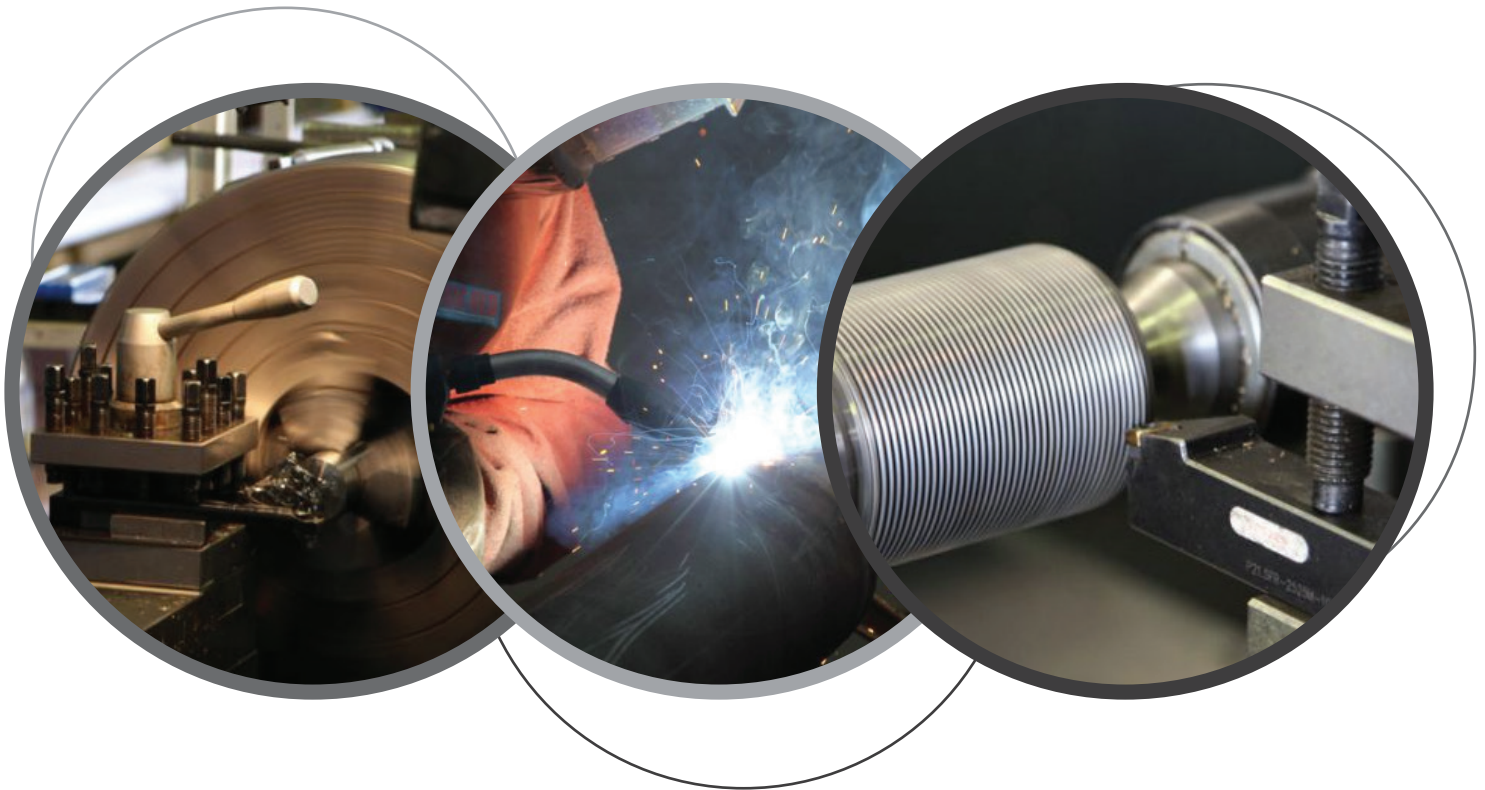


# **BILLET ENGINEERING**



## **CODE OF BUSINESS CONDUCT**



[www.billetengineering.com.au](http://www.billetengineering.com.au)

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## MANAGING DIRECTOR'S MESSAGE TO EMPLOYEES

The excellent reputation of Billet Engineering Pty Ltd has been built over many years of business success, supported by our values of Integrity, Accountability, Courage, Pride and Recognition.

These values act as guiding principles for our operating company.

Our values have developed a culture that is performance and results oriented. As we continue to grow, the embedding of our values is critical in ensuring that we continue to operate successfully and meet the standards expected by the diverse range of clients we service and the communities in which we operate.

Our Code of Business Conduct (Our Code) sets out the standards we expect from all of our people, in our company, within Billet Engineering – what we value and how we work with each other and with others.

Our Code is not new, it is only formalising the good principles and practices that already guide our decision making and provides consistent guidelines to help us decide the right thing to do. Integrity and ethical conduct have always been at the heart of our way of doing business. Our Code clarifies the boundaries of what is right and ethical.

It is important that you understand Our Code and your responsibility in adhering to it.

Our Values, Our Way and Our Code provide a unifying bond across all aspects of our operating company, providing a solid foundation for our future success.

Please take time to read and understand Our Code and think about how it relates to you and your work

**Paul Flynn**  
**Managing Director**  
**Billet Engineering Pty Ltd**



## INTRODUCTION

### BILLET ENGINEERING FRAMEWORK

Billet Engineering is a value driven company which operates within an integrated framework of values, principles and ethical obligations designed to guide business performance and set clear expectations for internal culture and business conduct.

This framework incorporates:

- Our Purpose
- Our Values
- Our Goal
- Our Way
- Our Code

Each of the components of the framework is briefly outlined below.

### OUR PURPOSE

To build and renew infrastructure which is of benefit to others, enabling our company to grow for the betterment of our employees and shareholders.

### OUR VALUES

- **INTEGRITY**                    A fair and honest approach in all our dealings  
Honouring all our commitments  
Responding positively to others
- **ACCOUNTABILITY**        Each of us “Getting it right and on time”
- **COURAGE**                    Willingness to “Have a go” and find better ways
- **PRIDE**                         In our people, equipment and our work.
- **RECOGNITION**            Of individual and team performance and supporting personal  
Growth
- **OUR GOAL**                    Committed to strength in Australian Engineering
- **OUR WAY**                    The signature employee behaviours that demonstrate our values  
and underpin our success and support our people, Performance  
and Capability.

### OUR CODE OF BUSINESS CONDUCT (OUR CODE)

The business principles we follow to demonstrate and ensure our integrity to all.

- Individual and with fellow employees
- With our community and governments
- With our clients and suppliers
- When using business resources



# 1 WORKING WITH INTEGRITY - UNDERSTANDING AND USING OUR CODE

## 1.1 PURPOSE OF OUR CODE

Our Code guides business conduct for all Employees and those who work on behalf of Billet Engineering. It builds on Our Values and Our Way to ensure we uphold ethical business standards and meet or where possible, exceed applicable legal and other requirements. We believe our value of Integrity is critical to our business success and our reputation in the community.

Our Code has been set out to cover aspects of decision making concerning personal conduct and working with:

- Fellow employees
- Clients
- Government
- Communities
- Business Partners
- Business Suppliers

Our Code and Values underpin everything we do and must always be upheld. There are times when difficult decisions need to be made. You can be confident that following Our Code will result in making the right decisions and building a business in which we can all be proud.

Our Code references relevant Policies and Procedures. It covers employees, contractors and consultants or other parties working on our behalf under a contractual obligation. For simplicity, we refer to this group as Employees in this document. Suppliers are not covered by it, but we encourage the use of external parties that have similar codes.

Our Code cannot cover every law and regulation that we are bound by but does set our minimum standard.

If you are unsure about a situation please seek advice. Our Code does not remove the need for us all to exercise good judgment –it just makes it easier for every one of us to do so. We all have a responsibility to work with integrity and good judgment, as well as within the law.

All Employees will be fully supported in applying Our Code and any form of retaliation and retribution against individuals doing so will not be tolerated. We ask you to report any breaches of Our Code immediately.

Please make yourself familiar with Our Code and refer to it whenever you are seeking guidance. Following Our Code and Our Way will ensure we can maintain the pride and integrity that we hold dear and ensure we achieve our goal to become “the best Engineering Company in Australia”.



## 1.2 RESPONSIBILITIES OF EMPLOYEES OF BILLET ENGINEERING

When working for Billet Engineering, you agree to uphold a commitment to respecting the values of the Billet Engineering, the requirements of Our Code, and the policies, standards and procedures that apply to your position and work.

All Employees must adhere to the principles and requirements contained in

Our Code and take reasonable steps to ensure that other individuals of Billet Engineering conduct business on behalf of Billet Engineering, including contractors, and suppliers, do likewise.

Employees must also have a detailed understanding of Billet Engineering policies, standards and procedures that apply to their work. These are available via request.

Queries on the meaning of Our Code or concerns about actual or potential breaches must be promptly raised.

It may seem easier to keep silent or look the other way, but our commitment to with integrity means we must never ignore an issue that needs to be addressed.

Many inappropriate actions are caused not through deliberate dishonesty or negligence, but by someone simply not having the proper information, not understanding the information they have or through a desire to “just get things done”.

Remember, the longer we wait to resolve a concern, the worse it may become. If you are in doubt about what to do or whether to speak up, it may help to do the

### **Business Conduct Quick Test by asking yourself some simple questions:**

- **The values test:** Does it fit with our values?
- **The safety test:** Could it directly or indirectly endanger someone or cause him or her injury?
- **The law test:** Is it legal and in line with our policies and standards?
- **The conscience test:** Does it fit with my personal values?
- **The newspaper test:** If the story appeared in the paper, would I feel comfortable with the decision?
- **The family test:** What would I tell my partner, parent or child to do?
- **The ‘feel’ test:** What is my intuition or ‘gut feel’? If it ‘feels’ bad, then it probably is bad.

Failing any of the above ‘tests’ indicates that you need to talk with someone about the concern you have. If you have any doubts about the proper course of action, always seek advice.



### 1.3 RESPONSIBILITIES OF THOSE WHO SUPERVISE OTHERS

The Managing Director (MD) of Billet Engineering is responsible for the ethics and culture of the Company. The MD and their management and supervisors have a responsibility to support the Billet Engineering MD in upholding a high standard of business conduct.

The Ethics Compliance Committee will assist the MD with compliance in our Code.

This includes:

- Establishing internal processes that address risk areas in relation to business conduct and ensuring that actual or potential breaches are appropriately investigated and handled.
- Ensuring all business conduct breaches are reported to the Ethics Committee (ECC).
- Taking or recommending appropriate actions to address business conduct issues
- Always demonstrating behaviour consistent with Our Code
- Undertaking activities to foster a culture in which Employees understand their responsibilities; feel comfortable raising concerns without fear of retaliation; are encouraged to work according to our values; and are rewarded for such behaviour
- Making certain that mandatory Billet Engineering policies, standards and procedures are accessible and understood
- Embedding the requirements of Our Code into existing systems; for example, performance management processes, employment and supply contracts, induction and industrial agreements
- Responding promptly and seriously to Employees' legitimate concerns and questions about business conduct issues and seeking further assistance if required.

#### Ethics Compliance Committee (ECC)

The Ethics Compliance Committee (ECC) consists of the Chairman, the

Billet Engineering MD and at least one other senior staff member of Billet Engineering to assist the Billet Engineering MD in meeting his responsibilities by advising on matters affecting the values and culture of the Company.

The ECC meets regularly and assists business and functional leaders in assessing acceptable outcomes in cases where adjudication is required. It also oversees the process for handling breaches of business conduct, as well as monitoring and reporting on emerging policy issues and compliance with Our Code.



## 1.4 RAISING A BUSINESS CONDUCT CONCERN

Raising a business conduct concern ultimately protects the business, and colleagues. If you think a decision or action is out of step with our values or you have a concern about complying with Our Code, a Group policy, standard or procedure, or any other Billet Engineering requirement or the law, you have a right and a responsibility to raise that concern. Concerns should be handled in accordance with our Grievance Resolution Procedure MP-6-34. This describes a confidential process where you:

- Initially raise concerns or issues of clarification with your manager or supervisor
- Contact your Human Resources; Health, Safety, Environment (HSE) representative or other member of senior management
- Refer the matter to the ECC if it is not possible to resolve or if it relates to a potential or an actual instance of fraud.

You do not need to be directly affected by an issue in order to raise it you can report a concern that you have become aware of through your work.

While everyone is encouraged to raise a business conduct query or concern, we consider such action done with mischievous or malicious intent to be against our values –all issues raised should be genuine.

### Safeguarding against retaliation

We prohibit any form of punishment, disciplinary or retaliatory action being taken against anyone for raising or helping to address a genuine business conduct concern. Retaliation is grounds for discipline, including dismissal in accordance with our Discipline and Termination Procedure MP-6-31.

The procedure outlines the specific steps and responsibilities required to deal with any issues raised.

## 1.5 BREACHES OF OUR CODE

Failing to comply with Our Code is viewed as a serious matter that must be addressed in accordance with the Discipline and Termination Procedure.

Supervisors and managers will be held accountable not only for their own business conduct, but also for that of their staff. Breaches will be dealt with in accordance with the Discipline and Termination Procedure.

The nature of any action will depend on the seriousness of the breach and other relevant circumstances.

Examples of disciplinary action that may be taken include a discussion with a manager about desired behaviour, a verbal or written warning, counselling on misconduct, transfer to a position with a lower level of responsibility, suspension, and dismissal.

If the situation involves a violation of law, the matter may also be referred to the appropriate law enforcement authorities for consideration.





In addition to failing to comply with Our Code, misconduct that may result in discipline includes:

- Requesting others to breach a mandated behaviour from Our Code
- Failing to raise promptly, known or suspected breaches of Our Code, policies or procedures
- Failing to cooperate in investigations of possible breaches regarding your own behaviour
- Retaliation against another person for reporting a business conduct concern
- Failing to demonstrate leadership and diligence to ensure compliance with Our Code and the law.



## 2. WORKING WITH INTEGRITY – INDIVIDUALLY AND WITH FELLOW EMPLOYEES

### 2.1 HEALTH, SAFETY AND THE ENVIRONMENT (HSE)

We are committed to providing and maintaining a safe work environment for Employees, subcontractors and others.

Our safety motto is “no harm in doing it right”, which encapsulates our commitment to eliminating harm from our workplace. We are committed to conducting our business activities in a way that minimises environmental risks and adverse effects on the environment.

We are committed to achieving best practice in HSE as reflected in the Safety and Health Policy P-6-10 and our Environmental Policy P-8-01

Across the group, our HSE practices are governed by mandatory policies and procedures that apply to all Employees. Managers are accountable for their implementation and for ensuring that supporting systems are in place. Within the company, health and safety targets are set and performance against these targets is closely monitored, measured and reported on a continual basis .

#### Personal security

Protecting the security of our people and workplaces is critical. Employees must understand and follow site and business security procedures and promptly report any circumstances that appear to represent a threat to the safety of themselves, other people or our assets. You must always follow the HSE system that has been put in place for your worksite. There are some common “Do’s and Don’ts”

#### DO

- Comply with the requirements of our mandatory HSE procedures, and assist those working with you to do the same
- Ensure you identify, assess and take steps to control HSE hazards associated with your work
- Stop immediately any work that appears to be unsafe or may contribute to a significant environmental or community incident
- Use the personal protective equipment required for the task you are undertaking
- Handle and dispose of all materials properly, safely and lawfully
- Make sure you know what to do if an emergency occurs at your workplace and that visitors are familiar with emergency procedures
- Report to your manager any HSE hazard or incident so that appropriate action can be taken to prevent, correct or control those conditions. Never assume that someone else will report a risk or concern and that you therefore do not need to report it
- Give due consideration to HSE Alerts



- Only engage subcontractors and supplier that have been assessed on their HSE risks, processes and performance.

### DON'T

- Undertake work unless you are trained, competent, medically fit and sufficiently rested and alert to do so
- Undertake work when you may be impaired by alcohol or drugs (illegal, legal or prescribed)
- Use or tolerate threats, intimidation or other violence at work
- Ignore a potential or actual environmental incident or assume that someone else will report it
- Undertake work that has the potential to impact on the environment unless you are authorised, trained and competent to do so.

## 2.2 DRUG AND ALCOHOL (D&A) USE

Our aim is to maintain a work environment that is free from harm arising from the misuse of drugs or alcohol. Our clients and other stakeholders therefore receive an ongoing assurance that our personnel and subcontractors are not impaired by the use of drugs or alcohol at the workplace.

Our Drug and Alcohol Policy P-6-02 applies to all worksites. If you consume alcohol during working hours, you must not return to work for that shift.

As a general rule, smoking is prohibited in all our buildings. To prevent exposure to passive smoking a designated smoking area is clearly identified.

The possession or use of illegal substances on our premises, at our functions or in conjunction with any business dealing is prohibited. You should make yourself familiar with the drug and alcohol testing and support programs.

Breaches of the Drug and Alcohol Policy may result in misconduct proceedings. Employees may access our Employee Assistance Program (EAP) in accordance with our Employee Assistance Program Policy P-6-12.

### DO

- Report to work fit and ready to carry out assigned work
- Recognise and take appropriate action on the early symptoms of a dependency condition exhibited either by yourself or a person that you supervise
- Treat the matter of dependency of fellow Employees confidentially.
- Raise it with your supervisor, manager or Human Resources representative and you are taking prescribed drugs or are receiving medical treatment for a medical dependency that has the potential to affect your ability to undertake you job safely. Further advice can be sought if necessary
- Cooperate with drug testing programs.



**DON'T**

- Undertake work (including driving to and from work and attending work functions) when you are impaired by alcohol or drugs (illegal, legal or prescribed)
- Consume, offer or make available alcoholic beverages during rostered working hours
- Possess, use or transfer illegal drugs or other illegal substances on Billet Engineering premises
- Ignore a case of substance abuse if you witness one.

**2.3 EQUALITY IN EMPLOYMENT - WORKING WITH ONE ANOTHER**

Bullying is repeated behaviour directed towards an individual or group of individuals that is unreasonable and creates a risk to health and safety. Harassment and bullying are illegal and may lead to penalties for individuals and the company.

While we must always obey the applicable laws and regulations governing the fair and proper treatment of others (including our Employees), we seek to go beyond simply meeting the letter of the law and, instead, be guided by Our Code.

All our people are responsible for ensuring that they consider the implications of their behaviour at all times and take necessary corrective steps.

If you have any queries, always seek advice from your management.

**DO**

- Treat everyone with respect and dignity
- Speak up and tell a person if you are upset by his or her actions or behaviour, explain why and ask the person to stop. If you are not comfortable in doing this, or if this approach fails to resolve an issue, speak to your supervisor, manager or Human Resources representative.
- Foster a work environment free from harassment.

**DON'T**

- Behave in a manner that could reasonably be perceived as offensive, insulting, intimidating, malicious or humiliating
- Assume that what is acceptable in one culture is equally acceptable in another
- Make jokes or comments that are racial, ethnic, religious, sexual, or related to age, physical appearance or disability
- Engage in sexual harassment; for example, unwelcome sexual advances, requests for sexual favours, inappropriate or unwelcome physical contact or sexual suggestions
- Distribute or display offensive material, including inappropriate pictures or cartoons
- Spread malicious rumours or use Billet Engineering resources to transmit derogatory, discriminatory, abusive or harassing material.



## 2.4 PERSONAL INFORMATION AND PRIVACY

We are committed to protecting the privacy of individuals. The protection of personal information is required by law. All Employees and officers of Billet Engineering are expected to comply with legal requirements and Billet Engineering's policies and procedures concerning the protection of personal information. All Employees must understand and comply with our Privacy Policy P-6-15

Personal information means information or data relating to an individual who can be identified by that information or data alone, or in combination with other information or data that is in Billet Engineering's possession.

We will only collect personal information in a lawful and fair manner, and in a way that is not unreasonably intrusive. We will not use or disclose such information for any purpose other than the purpose for which it is collected.

Data, information or electronic communications created or stored on Billet Engineering's computers or other electronic media, including personal information, are Billet Engineering's records and are, therefore, Billet Engineering's property. To the extent permitted by law, the Billet Engineering reserves the right to monitor or audit employee use of its information systems, and access electronic communications or information stored on Billet Engineering systems for maintenance, business needs or to meet a legal or policy requirement. If you have any doubt about the handling of personal information, consult your manager.

### DO

- Comply with all legal requirements that apply to the collection, use and retention of personal information. Only collect, use and retain personal information that is necessary for legitimate activities and functions
- Use personal information only for the purpose for which it was collected (including related purposes), unless otherwise approved by the relevant individual
- Utilise safeguards to help protect personal information against such risks as loss or destruction or unauthorised access to or use, modification or disclosure of data
- Have a system to help ensure that personal information is not retained longer than legally required or necessary to meet the business reason for which the information was collected
- Maintain the accuracy of personal information.

### DON'T

- Access personal information unless you have appropriate authorisation and a clear business need for that information
- Provide personal employee information to anyone inside or outside Billet Engineering without proper authorisation
- Conduct reference or security checks without proper authorisation or the consent of the individual.



### 3 WORKING WITH INTEGRITY – WITH OUR COMMUNITY AND GOVERNMENTS

#### 3.1 ENGAGING WITH OUR COMMUNITIES

Our ability to build relationships and work collaboratively and transparently with our host communities is critical to our long-term success.

Our aim is to be valued and respected by the communities in which we operate.

We do this by engaging regularly, openly and honestly with people affected by our operations, and by taking their views and concerns into account in our decision-making.

All Employees must understand and comply with our Corporate Social Responsibility Policy P-5-10. We understand that our business can potentially impact local communities.

We seek to positively impact the communities in which we work. We value local community knowledge and perspectives and will engage, and train, local labour and businesses where possible.

#### Sponsorship and charitable donations

We will support local community groups and charities through sponsorship programs and donations provided they comply with the law and meet the ethical standards of Billet Engineering.

In all cases, sponsorship programs and donations should be approved in accordance with applicable requirements and according to documented, approved and transparent assessment processes in accordance with the Sponsorship and Donations Procedure MP-5-12.

If you are responsible for sponsorship programs and donations you should ensure that appropriate due diligence is conducted before approving the commitment of funds or services. Preference should generally be given to incorporated organisations and recognised non-government organisations that have a presence in the community concerned

- Through our business dealings uphold the human rights within the sphere of influence of our employees, contractors, suppliers and the people in the communities in which we operate
- Seek to identify and consider the concerns and expectations of all stakeholders and especially those most affected by our operations and consult with them in decision-making
- Approve sponsorship programs and donations in accordance with the procedure
- Regularly monitor and evaluate the effectiveness of community sponsorship programs and donations
- Investigate concerns and complaints and report outcomes back to relevant stakeholders.



**DON'T**

- Offer a community sponsorship program or donation that is, or may be implied to be, in exchange for, or contingent upon, awarding contracts or to inappropriately influence individuals to make a decision in Billet Engineering favour.
- Intentionally favour individuals from one political, religious, or ethnic group based on their membership of that group. The exception is where such action supports an approved or legally required program of positive discrimination (for example, to assist historically disadvantaged groups in the community)
- Contribute to any religious organisation for religious purposes. Projects implemented by religious organisations that provide services to the general community may be acceptable, provided they comply with all other applicable Billet Engineering and legal requirements

**3.2 WORKING WITH GOVERNMENTS**

Billet Engineering respects the authority of governments wherever we conduct business. We will maintain open and constructive relationships with governments and their agencies, officials and personnel. Our ability to conduct business is affected by government decision-making, and we seek to have open and constructive relationships with governments. Employees and others who provide information to governments on behalf of Billet Engineering must ensure that all information is accurate and appropriate for the purpose.

Errors or omissions may damage Billet Engineering's reputation and credibility and could be illegal.

**DO**

- Be truthful, accurate, cooperative and courteous when dealing with government or regulatory agency officials
- Notify and seek advice from your business's most senior manager representative if you receive a non-routine request.

**DON'T**

- Attempt to obstruct the lawful collection of information, data, or records

**BE CAUTIOUS OF...**

- Accepting information about a competitive selection of a supplier or a competitor's offering or accepting gifts or hospitality or requests to reimburse costs when dealing with clients or suppliers. This will protect the reputation of Billet Engineering against allegations of improper behaviour!



## 4 WORKING WITH INTEGRITY – WITH OUR CLIENTS AND SUPPLIERS

### 4.1 BRIBERY AND CORRUPTION

Bribery and corruption in all forms will not be tolerated by Billet Engineering. We are committed to acting honestly with all clients and suppliers. All Employees must understand and comply with our Anti-Corruption Policy P-5-09 as well as the Gifts Procedure MP-5-10 and Hospitality Procedure MP-5-11.

We prohibit authorising, offering, giving or promising anything of value directly or indirectly (via a business partner) to a government official, or client representative, to influence their actions or decisions, or to anyone to induce them to perform their work disloyally or otherwise improperly.

A breach of anti-corruption laws is a serious offence, which can result in fines for Billet Engineering and Employees and the imprisonment of Employees. Even the appearance of a breach of these laws can have a serious reputational impact on Billet Engineering. A breach of our anti-corruption policy is also a serious offence, which can result in disciplinary action up to and including dismissal.

Since Billet Engineering cannot cause or authorise third parties to engage in conduct when acting on our behalf that we cannot engage in directly, no such person or entity (called 'business partners' in this Code) may be hired or otherwise partnered with if there is any material risk that they or it will violate applicable anti-corruption laws or the prohibitions in our policies.

#### DO

- Obtain prior authorisation before offering, promising or giving anything of value
- Conduct due diligence in selecting and engaging business partners as required by our Anti-Corruption policy
- Communicate our anti-corruption requirements to business partners and ensure that business partner activities are appropriately monitored.
- Ensure that all expenditures are accurately recorded in reasonable detail in our books and records
- Immediately report any corruption concerns so that appropriate action can be taken.

#### DON'T

- Authorise, undertake or participate in schemes to give any improper benefit, kick-back or secret commission to anyone
- Offer, promise or give a cash or cash equivalent payment of any kind to a government official or client representative unless prior authorisation is received
- Establish a 'slush' fund
- Use a business partner to do something that Billet Engineering is prohibited from doing itself
- Give anything of value to a business partner when there is a material risk that the business partner, in turn, will engage in prohibited conduct on our behalf
- Personally pay for a gift, hospitality or other thing of value in order to avoid complying with our requirements.





### BE CAUTIOUS OF...

- Compensation to a business partner that is disproportionate to the services provided
- Any request to make a payment that appears suspicious or to a name not related to the transaction, including, but not limited to, a charity or foundation
- Background information about existing or potential business partners that suggests they may be undertaking activities that could be considered improper.

## 4.2 CONFLICT OF INTEREST

Billet Engineering respects the privacy of its Employees. However, you must ensure your personal activities and interests do not conflict with your responsibility to Billet Engineering or compromise, or appear to compromise, the quality of your work performance, your commitment to your work and your ability to make impartial business decisions.

All Employees must understand and comply with our Anti-Corruption Policy P-5-09

A conflict of interest arises when an employee is in a decision-making position and participates in an activity or acquires another interest or loyalty that jeopardises, or could jeopardise, his or her judgment, objectivity or independence.

Conflicts of interest can arise in many ways, but common examples involve:

- Holding outside jobs and affiliations
- Jobs and affiliations of close relatives
- Investments
- Offering or accepting gifts and hospitality
- Pursuing Billet Engineering business opportunities for personal gain.

Business dealings and personal relationships that cause or may cause conflicts of interest or create the appearance of a conflict or potential conflict with an individual's obligations to Billet Engineering must be avoided.

You must excuse yourself from any decision-making process where you have an interest that influences, or may be perceived as influencing, your ability to make an objective decision and to fulfil your responsibilities to Billet Engineering.

You must promptly advise your supervisor or manager in writing of any outside activities, financial interests or relationships that may involve you either in an actual conflict of interest or the appearance of one.

Your supervisor or manager will ensure that the matter is properly reviewed. This will include considering whether it is appropriate for you to resume any discussions or activities that involve the conflict.



**DO**

- Conduct all business relationships in a professional, impartial and competitive manner
- Avoid business dealings and personal relationships that cause or may cause conflicts of interest (actual or potential) or create the appearance of a conflict with your obligations to Billet Engineering
- Advise your supervisor or manager in writing of any outside activities, financial interests or relationships that may either involve you in a conflict of interest or the appearance of one
- Obtain appropriate approval before accepting an officer or director position with another company or organisation
- Exercise good judgement when deciding to offer or accept gifts and hospitality
- Excuse yourself from any decision-making process where you have an interest that influences, or is perceived as influencing, your ability to make an objective decision and to fulfil your responsibilities to Billet Engineering.

**DON'T**

- Hold positions in organisations that have business dealings with Billet Engineering (including competitors, customers or suppliers, or your own or family business) if you are in a position to influence transactions or if the relationship itself creates an actual, potential or perceived conflict of interest
- Hire, promote or directly supervise a close relative, unless this has been specifically authorised
- Request a personal gift or hospitality of a supplier, customer or partner. This includes both direct requests and giving the impression that the offering of a gift or hospitality would be appropriate or desirable
- Misuse Billet Engineering resources or your position or influence at Billet Engineering to promote or assist an external activity
- Personally pursue or undertake any opportunities that Billet Engineering could have an interest in and that are identified through your position or use of Billet Engineering's information or property.

**4.3 GIFTS AND HOSPITALITY**

Offering or accepting gifts and hospitality is a legitimate contribution to building good business relationships. It is important, however, that gifts and hospitality never unduly influence business decision-making or cause others to perceive an undue influence.

All Employees must understand and comply with our Anti-Corruption Policy P-509 as well as the Gifts Procedure MP-5-10 and Hospitality Procedure MP-5-11.



Billet Engineering Employees must exercise the utmost care when offering or accepting gifts and hospitality in order to protect their own and our reputation against allegations of improper behaviour and to ensure that bribery laws are not breached.

Offering or accepting gifts and hospitality must always be done in accordance with the law and local business practice –for example, where the exchange of gifts is customary and the gifts are appropriate for the occasion –and be disclosed to your supervisor or manager.

In principle, gifts and hospitality should only be offered or accepted if they are occasional and of modest value. Refer to the Anti-Corruption Policy for guidance on determining what is “occasional and modest value”.

As a guide, the higher the monetary value of the gift or hospitality, the greater the level of transparency that is required. All gifts and hospitality must be disclosed to your supervisor or manager.

Tips (or gratuities) should be paid according to local customs and practices, and not be excessive or more than local standards.

Gifts or hospitality of any kind must not be solicited from a supplier, customer or other party with whom the Billet Engineering conducts business.

As a general rule, offers to Employees of sponsored travel are to be rejected. If there is a valid business purpose to attend an event or function, then Billet Engineering will pay for any travel and/or accommodation costs. Where practical alternative means of travel or attendance at Billet Engineering’s expense are not available, you should refer the matter to a senior executive for consideration. Sponsored travel is not made acceptable by being undertaken during a period of leave.

In some limited circumstances, as part of an approved Billet Engineering - hosted event or sponsorship program, the cost of travel and accommodation associated with hosting our business partners may be met by Billet Engineering where there is a clear business case to do so.

#### **It is prohibited to offer or accept:**

- Loans, cash or personal cheques
- Product or service discounts that are not available to all Employees, unless arranged by an approved social club
- Gifts, favours or any form of hospitality or entertainment in return for, or in exchange for, business services or information. (Such action may create an actual or perceived conflict of interest or may give the impression of anti-competitive behaviour.)
- Gifts or hospitality of an inappropriate nature (for example, sexually oriented) or at inappropriate venues
- Gifts and hospitality not designed to further a valid business purpose or relationship.



**DO**

- Ensure gifts and hospitality are modest. Ask what the recipient's employer's policy is, and take that into consideration in offering gifts or hospitality.
- Clearly articulate Billet Engineering's practices on the offering and accepting of gifts and hospitality at the beginning of new business relationships, especially where cultural norms may be different to those outlined in Our Code.
- Assess the potential for a conflict of interest when offering or accepting gifts or hospitality.
- Be prepared to decline politely any offer not in line with our practices
- Regard gifts or hospitality received through an intermediary as the same as those given directly.

**DON'T**

- Accept or offer prohibited gifts and hospitality in any form
- Request a gift or hospitality of any kind from a supplier, customer, partner or other party with whom Billet Engineering does business.
- Personally pay for a gift or hospitality in order to avoid complying with our standards.

**BE CAUTIOUS OF...**

- Exchanging gifts or entertainment with representatives of our competitors, as such action may create an actual or perceived conflict of interest or may give the impression of anti-competitive behaviour.

**4.4 BUSINESS TRAVEL**

We seek to provide those travelling for business purposes with a reasonable level of service and comfort that is cost-effective and convenient, and that protects the health and safety of the traveller.

Billet Engineering will cover the cost of moderate expenses incurred provided that valid invoices or records are supplied.

When travelling, individuals have prime responsibility for their own health, safety, and security.

All travel should be economy/coach class unless specific approval for business class travel has been given by your business MD.

Billet Engineering does not normally provide Employees with daily travel allowances.

Queries relating to relocation travel should be referred to your local Human Resources representative.

**DO**

- Have your travel approved by your supervisor or manager prior to commencing travel
- Use the contracted travel provider for all business travel bookings



## DON'T

- Accept offers of sponsored travel.
- In principle, such offers should be rejected; if there is a valid business purpose to attending an event, Billet Engineering will pay any travel, and or accommodation cost.
- Where such alternatives are not available, you should refer the matter to the MD for approval.
- Travel if you have passed the 26-week stage of pregnancy, unless you have first obtained written approval from your own doctor.
- Authorise your own expenses or the expenses of an employee more senior than you unless you are given a specific delegation of financial authority.

## 4.5 COMPETITION AND ANTITRUST

You must comply with antitrust (or competition) laws that are designed to prohibit a range of practices that restrain trade or restrict free and fair competition, such as price fixing and acts designed to achieve or maintain the power of a monopoly or cartel.

Conduct in breach of these laws is strictly prohibited.

All Employees must understand and comply with the Australian Competition & Consumer Act 2010 (ACCA) which is enforced by the Australian Competition and Consumer Commission.

Breaches of competition laws carry potentially serious consequences for Billet Engineering and for Employees or other individuals who may be involved. Penalties range from imprisonment in some countries to substantial fines.

The information in this Code is intended only to alert Employees of the need to comply with the requirements set out in the ACCA and to briefly summarise some key aspects of those standards.

In all cases where further input, guidance or advice is necessary, refer to the MD.

## DO

- Consider the antitrust ramifications when interacting with a competitor
- Maintain our independence of judgement in pricing, marketing and tendering. Avoid any action which could imply any coordination with competitors
- Consult with your MD: Before entering any agreement with a competitor
- Immediately, and before taking any action, if you have any doubts or questions about antitrust issues.



**DON'T**

- Act in breach of antitrust (or competition) laws.
- Agree or reach an understanding with any competitor relating to:
  - Tender Prices and the terms or conditions of sale
  - Work in Hand
  - Customers to whom any services will or will not be sold
- Communicate in any way with any competitor the following, unless it is already publicly available:
  - Negotiations with customers or suppliers or general negotiation strategies
  - Terms of trade, including but not limited to, prices
  - Work in Hand or Marketing activities.
  - Previous, current or future business activity levels or market conditions.

**4.6 MAINTAINING SUPPLIER RELATIONSHIPS**

Supplier relationships can make a significant contribution to the success of Billet Engineering. We aim to have effective, streamlined processes with suppliers, and encourage suppliers to adopt standards and procedures similar to ours.

All Employees must understand and comply with our Supplier Management Policy P-6-36, and the Supplier Management Procedure MP-7-60.

Through their actions, suppliers can directly impact the financial performance and profitability of Billet Engineering, as well as adding to, or detracting from, its reputation. Wherever possible, we seek to establish a Collaborative relationship where suppliers can be viewed as partners.

We take great care in operating a fair and equitable procurement process. Our selection process aims to clearly inform potential suppliers of our expectations, policies, procedures and requirements of them.

In general terms, we seek suppliers who share our commitment to:

- Lawful business practices conducted according to a high standard of business conduct
- Management practices that respect the rights of all Employees and the local community
- Minimising the impact on the environment.
- Providing a safe and healthy workplace.

If there is any doubt or concern in relation to the supplier or potential supplier's integrity or ability to perform the contract, you should ensure that these issues are resolved. This may require that you raise these issues with your supervisor or manager.



All procurement decisions should be based on the best value received, taking In to account the merits of price, quality, performance and suitability.

### DO

- Seek to obtain a competitive bid prior to entering into a contract or commitment with a supplier
- Conduct an appropriate risk assessment and commercial review, including an assessment of the potential supplier's HSE performance, reputation, conduct, probity, qualifications and experience, creditworthiness and ability to meet applicable Billet Engineering standards.
- Obtain all appropriate internal approvals, including formal approval as an Approved Supplier.
- Ensure that a formal agreement is in place that clearly states the services or products to be provided, the basis for earning payment, the applicable rate or fee and other requirements in accordance with the Supplier Management procedure.
- Conduct regular reviews of supplier relationships to ensure performance.
- Verify that invoices clearly and fairly represent goods and services provided.
- Make payments only to the person or organisation that actually provides the goods or services. Payment must be made in the supplier's home country, where it does business or where the goods were sold or services provided, unless approval is obtained otherwise from your MD.
- Help our suppliers understand Billet Engineering compliance and business conduct requirements.
- Be alert to and report to your supervisor or manager any activity by a supplier that is inconsistent with our business conduct requirements.

### DON'T

- Use suppliers who supply unsafe or environmentally irresponsible products or services, break laws or regulations.
- Give one supplier's confidential business information (for example, proposed rates, winning bid information and the like) to another supplier.
- Agree to a contract or commitment that includes a reciprocal agreement or exchange of favours.



## 5 WORKING WITH INTEGRITY – WHEN USING BUSINESS RESOURCES

### 5.1 PROTECTING BILLET ENGINEERING ASSETS

All Employees are responsible for safeguarding and appropriately using Billet Engineering assets under their control.

Billet Engineering's assets must not be used for personal benefit.

Employees must comply with the Information Technology Usage Policy P-6-14 and the Asset Management Policy P-6-34.

Billet Engineering's assets may include property, time, proprietary information, corporate opportunities and funds, as well as equipment used by individuals, such as mobile phones and computers.

Appropriate precautions should be taken to prevent theft, damage, misuse or intentional damage of such assets. This includes not allowing Billet Engineering's resources to be destroyed, disposed of, sold, loaned or donated without appropriate approvals, unless the items are of nominal value and can no longer be used by Billet Engineering.

To reduce the opportunity for misuse of Billet Engineering resources, all Employees must adhere to applicable approval requirements. To further reduce risk of erroneous or inappropriate actions, Billet Engineering also endeavours to ensure that particular tasks and the responsibility for the review and approval of such tasks are segregated between different members of staff. In principle, an individual should not be in a position to initiate, approve and review the same action or decision.

At all times Billet Engineering funds should be used properly, sensibly and effectively, and appropriate and accurate records kept.

While in the workplace, you are expected to be fully engaged in your work and not undertake personal activities beyond a very modest level. You are required to record the hours you work truthfully and accurately.

You also have a duty of care to advance our business interests. You must never compete with Billet Engineering or use its property, information or your position for personal gain.

Billet Engineering also expects you to respect the assets of others, and never knowingly damage or misappropriate the assets of others, irrespective of whether the assets are physical or intangible (for example, intellectual property and confidential information).

#### DO

- Take care to prevent waste, loss, damage, misuse, theft or misappropriation of Billet Engineering assets.
- Record work time, financial transactions and other business information accurately.
- Comply with applicable Billet Engineering requirements and laws regarding the use, and transfer, of our assets.





- Ensure third parties follow established guidelines and procedures when dealing with our assets.
- Make sure you know what to do if an emergency occurs at your workplace and that visitors are familiar with emergency procedures.
- Prevent non-authorized personnel from accessing our facilities.
- Lock or appropriately protect unattended Billet Engineering buildings, storage areas, vehicles, and equipment.

#### **DON'T**

- Use our equipment or facilities for personal activities, except as otherwise specifically allowed in this Code or in other very limited circumstances where you have obtained prior approval
- Use our equipment or facilities to access offensive material, such as (but not limited to) pornography
- Permit unauthorized entry to an Billet Engineering facility
- Duplicate keys to an Billet Engineering property without appropriate authorisation
- Ignore security complaints or inadequate security procedures or practices that may present safety threats to either our people or our assets; immediately raise the matter with your supervisor or manager.

#### **BE CAUTIOUS OF...**

- Inadequate security procedures or practices that may present safety threats to either our people or assets
- A visitor at Billet Engineering facility not wearing an appropriate security badge; discuss the matter with the individual or alert your supervisor or manager.

## **5.2 ACCURACY OF RECORDS AND REPORTS**

All data created and maintained by Billet Engineering Employees must accurately reflect the underlying transactions and events. Falsifying, concealing, altering, destroying or otherwise tampering with information, or creating misleading information will not be tolerated by Billet Engineering, and may also be illegal.

You must comply with the Information Management Policy P-4-03.

Reference to 'Billet Engineering data' in this section includes any data or information concerning Billet Engineering or its business activities, whether financial or non-financial and in whatever medium it is held (for example, paper, computer, or other electronic medium).

We will comply with all applicable accounting and financial reporting rules, laws and regulations in each jurisdiction in which we operate.



All transactions must be properly authorised and accurately and completely recorded in the relevant accounts and records as required by law and applicable to Billet Engineering's requirements.

Once created, data must be appropriately retained and disposed of according to Billet Engineering information management practices and applicable laws and regulations.

Employees responsible for the accuracy of financial reporting have an additional responsibility to ensure that adequate internal controls exist to deliver accurate, complete, consistent, timely, and understandable financial and management reports.

The applicable reporting standards must be followed at all times.

Compliance with the above requirements is mandatory and is audited.

If you have any concerns about the validity of any financial process or record - keeping activity or believe you are being asked to create false or misleading information, you must immediately report these to your supervisor or manager.

There is never a justification for falsifying records or misrepresenting facts.

Such conduct may constitute fraud, and can result in civil or criminal liability for you and for Billet Engineering.

## DO

- Keep accurate, complete and true books, records, accounts and documentation in accordance with generally accepted accounting principles and our internal procedures
- Protect our records from unauthorised access or interference
- Ensure that no undisclosed or unrecorded account, fund or asset is established or maintained
- Cooperate fully with our internal and external auditors
- Immediately report any actual or suspected irregularities or weaknesses in relation to auditing, accounting or internal control matters
- Demonstrate integrity in submitting and approving expense claims
- Retain documents and records in accordance with the applicable laws and our information management procedures
- Return or transfer the custody of all relevant records if you leave the Billet Engineering.



**DON'T**

- Commit Billet Engineering to contractual obligations that are beyond the scope of your authority
- Deliberately falsify any record or make a false or misleading entry (financial or non-financial) in a report, record or expense claim
- Circumvent review and approval procedures
- Influence or allow others to do anything that would compromise the integrity of our records or reports
- Conceal or tamper with our records or documents.

**BE CAUTIOUS OF...**

- Financial results that seem inconsistent with underlying performance
- Inadequate routines and controls to preserve documents (including electronically stored information)
- Disposing of documents and records without knowing what is being discarded or whether they must be kept for legal reasons.

**5.3 INFORMATION SYSTEMS**

Computer hardware and software and all data on Billet Engineering information systems, as well as any Billet Engineering data on your home or other digital systems, are the property of Billet Engineering.

Our information systems should always be used in a responsible manner.

Employees must comply with the Information Technology Usage Policy P-6-14.

Employees have access to a wide range of Billet Engineering Information and Communications Technology (ICT) and communications systems to assist them in performing their jobs.

Such systems and the data created or stored on them are regarded as our property.

All hardware, software and data must be adequately safeguarded against damage, loss, theft, alteration and unauthorised access. Unauthorised use, duplication, or sale of software or media files (including portions of audio, video, electronic images and off -the-internet or off -the-air recordings) is prohibited.

The use of Billet Engineering's ICT systems is logged.

IT is also monitored and audited for the purposes of information security, operational management, and cyber-crime, and to ensure it is compliant with laws, regulations, and our policies.

To the extent permitted by law, Billet Engineering reserves the right to monitor or audit employee use of its ICT systems, and access, review and disclose data stored on our systems for maintenance, business needs or to meet a legal or policy requirement.



Inappropriate material is not permitted to be accessed by using, or stored on, our systems in any form.

In the event that inappropriate material or other behaviour that is inconsistent with our policies and procedures is identified, disciplinary action, including dismissal, may be taken and local management may notify civil and/or criminal authorities.

Inappropriate material includes pornographic or sexually explicit or exploitative images or text; materials promoting violence, hatred, terrorism or the intolerance of others, and any material that is obscene and abusive.

Appropriate modest personal use of Billet Engineering ICT systems is permitted.

#### DO

- Advise your IT representative of inappropriate unsolicited material; for example, spam
- Ensure hardware, software and data for which you are responsible are appropriately safeguarded
- Treat emails and other electronic forms of communication as official Billet Engineering records.

#### DON'T

- Engage in unauthorised use, duplication or sale of software or media files
- Engage in on - line fraud or commit a cyber -crime
- Deliberately access, store, send, post or publish inappropriate material, or ignore others doing so
- Install software or connect hardware without licence and authorisation
- Upload or download or send material that is likely to cause annoyance, inconvenience or needless anxiety to your colleagues
- Disable Billet Engineering security measures

### 5.4 COMMUNICATING EXTERNALLY

Public disclosures must only be made by authorised spokespersons.

Employees must comply with the External Communication Policy P-5-11

Only authorised persons may speak to the media or an external forum on matters relating to Billet Engineering

Any presentations to external conferences or forums must be approved by the relevant business MD.

#### DO

- Obtain all relevant approvals prior to publicly releasing material
- Report the loss or theft of Billet Engineering information (for example, your computer, or briefcase) to your supervisor or manager immediately.



**DON'T**

- Disclose information to the public – including, but not limited to, the media and members of the community – unless you are specifically authorised to do so
- Divulge what may be confidential information – either internally or externally – unless you are specifically authorised to do so. If you are unsure about the degree of confidentiality assigned to information, contact the relevant manager.

**BE CAUTIOUS OF...**

- Placing comments and personal opinions on social media forums that reflect information not publicly available about Billet Engineering

**5.5 INTELLECTUAL PROPERTY**

Intellectual property (IP) can be an invention, trademark, original design or the practical application or expression of a good idea that has commercial value.

All Employees must work to safeguard the Billet Engineering intellectual property from use by outsiders. All Employees must comply with the Intellectual Property Policy P-6-35

IP is property in the same way as physical assets belong to the Company.

It is often highly valuable and, as markets become increasingly competitive, protecting our intellectual property is essential. Because it has been developed by Billet Engineering, it may have a right to protection under law relating to copyright, patents, trademarks, and the like.

**Relevant types of IP:**

- Copyright for original material in customer lists, reports, geological interpretations, methods of work, internal guides, multimedia and computer programs
- Patents for new or improved processes
- Database extraction rights
- Confidential or 'trade secrets', including know - how and other confidential or proprietary information.

You must protect IP in the same careful way that other Company property is protected and never disclose our intellectual property and other confidential information. These obligations apply throughout your employment and continue after your employment ends.

On occasion we may need to share our IP with persons outside of Billet Engineering – for example, to allow a third party to work effectively with us. Even when there seems to be a legitimate reason to do so, you should never disclose such information without management's prior approval and then under a written confidentiality agreement.



**DO**

- Regard the information obtained by participating in the development of processes for Billet Engineering, or the results of such work, as the property of Billet Engineering both during and after your period of employment with Billet Engineering
- Inform Billet Engineering of the results of all work done during or outside of working hours that relate to our business or operations.
- Billet Engineering is entitled to the exclusive benefits of any patents, copyright and the like relating to, or resulting from, this work.
- Employees may be required to enter into confidentiality agreements or to assist Billet Engineering in obtaining patents, copyrights or other protection in the name of Billet Engineering
- Check that there are no third party IP rights that may prevent the deployment of new technologies or processes.

**DON'T**

- Load any unlicensed software on any Billet Engineering computer
- Accept or use anyone else's confidential information, except under an agreement approved by the MD
- Bring Billet Engineering any confidential information, including computer records, from prior employers
- Use copyrighted materials or third -party trademarks (for example, portions of audio, video and off – the - internet or off – the -air recordings) in materials you are producing, including internet or intranet sites, without permission from the copyright owner. Consult your manager on whether 'fair use' may allow the use of brief excerpts
- Deploy or use new technologies without first ensuring that you do not infringe a third party's IP rights.

**BE CAUTIOUS OF...**

- Copying documents and materials not produced internally (including computer software) unless you have specific permission from the copyright owner to do so.



## PLEASE SIGN AND RETURN THIS PAGE TO HUMAN RESOURCES

- I have received a copy of Billet Engineering Code of Business Conduct (Our Code)
- I have read and understood the content fully.
- I undertake to retain this book and refer to it from time to time to reinforce my understanding of what is required of me.
- I undertake to seek further clarification from my Supervisor on any issue I do not understand.

<b>Name</b>	
<b>Signature</b>	
<b>Date</b>	

