

# Code of Conduct Policy

## Revision Status

Rev	Date	Author	Reviewed	Approved	Description
A	20180831	006-PB	005-AT	001-AS	Issued for Review
0	20180913	006-PB	005-AT	001-AS	Issued for Use

## Code of Conduct Policy

**Introduction:** iPilot Australia (iPilot) is committed to actively doing what is right in doing what we do.

This policy applies to work on all iPilot projects and sites.

**Code of Conduct:** iPilot's Code of Conduct sets out the rules and behaviours that all personnel are expected and required to follow.

**Objective:** iPilot's objective is to achieve the standards of business conduct expected of all personnel and to abide by policies, procedures and lawful directions that relate to their employment with iPilot and/or engagement with our clients.


**Policy Statement:** iPilot commits to:

- maintaining a high standard of integrity and professionalism;
- be responsible and scrupulous in the proper use of iPilot information, funds, equipment and facilities;
- be responsible and scrupulous in the proper use of Client information, funds, equipment and facilities;
- be considerate and respectful of the environment and others;
- exercise fairness, equality, courtesy, consideration and sensitivity in dealing with other employees, clients and suppliers;
- avoid apparent and real conflict of interests, promptly disclosing to an iPilot senior manager, any interest which may constitute a conflict of interest;
- promote the interests of iPilot and its clients with integrity;
- perform duties with skill, honesty, care and diligence;
- avoid any business transaction being influenced by offering or accepting gifts;
- under no circumstances may employees offer or accept money;
- ensuring any employee, who in good faith, raises a complaint or discloses an alleged breach of the Code, whilst following correct reporting procedures, will not be disadvantaged or prejudiced. All reports will be dealt with in a timely and confidential manner;
- proscribing any personnel from offering or accepting money;
- never, on any count, engage with a client/prospective client or contractor/prospective contractor which:
  - uses child labour;
  - uses slave or other forms of bonded or forced labour;
- where any iPilot personnel have any reason to believe that any client/prospective client or contractor/prospective contractor may be engaged in some manner with child, slave, bonded or forced labour, such concern should be relayed directly and confidentially to the iPilot Managing Director or Head of Operations;
- ensuring any employee in breach of this Code of Conduct may be subject to disciplinary action, including termination; and
- where any personnel have doubts about any aspect of the Code of Conduct they must seek clarification from the iPilot Managing Director or Head of Operations.

**iPilot Responsibilities:** We will maintain a working environment where iPilot personnel are active in fostering appropriate standards of business conduct.

**iPilot Personnel Responsibilities:** iPilot personnel are expected to uphold, at all times, the expected standards of behaviour.

CONTEXT NOTE: In the ordinary course most iPilot projects will be executed by third party contractors on client sites. It is expected that ordinarily the client will expect its systems to prevail. As a default, a best-of-both-worlds approach will be adopted so that iPilot or contractor systems will apply provided (i) the client agrees, and (ii) the iPilot or contractor system is to a higher standard than that of the client.

<b>Approved by:</b>	<b>Anthony Squire</b>	
<b>Position:</b>	<b>Chief Executive Officer</b>	
<b>Date:</b>	<b>13 September 2018</b>	
<b>Next Review Date:</b>	<b>30 July 2019</b>	

The above policy will be under regular review as iPilot moves towards seeking ISO accreditation.