



# BUSINESS PARTNER CODE OF CONDUCT

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## CONTENTS

1 PURPOSE	2
2 INTRODUCTION	2
3 SCOPE	2
4 BUSINESS CONDUCT	2
5 HUMAN RIGHTS AND EQUALITY	3
6 HEALTH, SAFETY, ENVIRONMENT AND QUALITY (HSEQ)	4
7 REPORTING CONCERNS AND VIOLATIONS	5
8 RESPONSIBILITIES	5
9 GOVERNANCE	6

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- a) using the documents or data in electronic form without requesting and checking them for accuracy against the original hard copy version; and
- b) using the documents or data for any purpose not agreed to in writing by i24s.

## 1 PURPOSE

i24s Group Pty Ltd (“i24s”) (“the Group”) (ABN 74 650 861 402), is a 100 per cent owned and operated Aboriginal business. The Group is a leading provider of talent pipeline/workforce solutions, industrial equipment hire and goods, and outreach and advocacy services, for the Mining, Resources, Energy, Infrastructure and Property sectors.

The Group is committed to upholding the highest standards of conduct, ethics and integrity in all aspects of our business practices and relationships.

Our **Business Partner Code of Conduct** (“Code”) sets out a common framework for how we expect our Business Partners to behave whenever they conduct business for, on behalf of or in partnership with i24s (i.e. they are required to uphold the same or equivalent principles and standards as i24s).

In addition to local laws and regulations, i24s supports and works actively to comply with guidelines regarding the business ethics, working conditions, anti-corruption and human rights, including the United Nations’ (UN)’ Universal Declaration of Human Rights.

## 2 INTRODUCTION

i24s acts with integrity in dealing with others and also expects our Business Partners to respect fundamental values such as human and labour rights, equal treatment, and non-discrimination.

Business Partners shall comply with laws, regulations, and associated requirements applicable to its business and throughout the supply chain, as well as with this Code.

Business Partners must not act in a way that could cause the Group to violate laws or regulations or expose the Company to penalties. Any violations of a laws, regulations or non-compliance with this Code may lead to stringent measures, including termination of the business relationship.

In the event of discrepancies between this Code and applicable law, the strictest standard shall apply.

## 3 SCOPE

This Code applies to employees, sub-contractors and other parties undertaking work for the Group. When the following terms are referenced herein, “we”, “our” or “us”, we are referring to everyone at i24s. The scope of this Code applies to all workplaces which are under the Group’s control.

## 4 BUSINESS CONDUCT

Business Partners of the Group must carry out business activities with honesty and transparency. They shall not engage in, nor tolerate, any form of corruption, blackmail, embezzlement, or bribery, whether directly or indirectly.

Business Partners shall:

- Act in accordance with all Australian requirements and legislations as well as internationally recognised standards for bribery and corruption including:
- The Australian Criminal Code Act 1995 (Cth) – which criminalises corrupt conduct both domestically and internationally.

- The UN' Convention Against Corruption – the only binding international treaty dealing with corruption.
- Carry out their activities in a manner that safeguards fair and open competition. They must comply with applicable anti-trust and fair competition laws and regulations. They must never enter into discussions or agreements with competitors concerning pricing, market or customer allocation, market sharing, bid-rigging, or other similar activities which could have anti-competitive effects.
- Never accept, request, offer, promise, give or authorise a bribe, kickback, payment, or anything of value (financial or otherwise) to obtain an unfair or improper advantage, retain business or influence another party's actions or decisions.
- Never offer or accept gifts, entertainment, or other business courtesies on behalf of i24s without prior authorisation from i24s.
- Not accept business courtesies of more than modest value, offer cash or cash equivalents or exchange any benefit with a public official or other recipient involved in an active procurement process or that would otherwise appear to reward, preferential treatment or create an obligation. If exchanged, business courtesies must be recorded, auditable and suited to the occasion or roles of those involved.
- Not make facilitation payments on behalf of i24s or for its intended benefit.
- Act in i24s' best interest and must avoid any actual, potential or perceived conflict of interest. We must be notified immediately of any conflict of interest that has arisen or may arise during their business relationship with the Group.

## 5 HUMAN RIGHTS AND EQUALITY

The Group promotes equality, diversity and inclusion and safeguards human rights. Business Partners must comply with all Australian requirements and legislations as well as internationally recognised human rights and standards.

Business Partners shall:

- Act in accordance with internationally declared human rights and standards, including those expressed in the UN' Human Rights Office of the High Commissioner's International Bill of Human Rights and the principles concerning fundamental rights set out in the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work.
- Respect the rights of Aboriginal and Torres Strait Islander people in alignment with the UN' Declaration of Indigenous Peoples.
- Follow the UN' Guiding Principles on Business and Human Rights, Respect, Protect, Remedy framework.
- Support and encourage a diverse and inclusive work environment that is free of harassment and any discriminatory, violent, harsh or inhumane treatment.
- Respect their employees' freedom to associate, form and join organisations and collectively bargain.
- Comply with laws, regulations and industry standards on working hours and wages. Employees of Business Partners should never have to surrender government-issued identification such as passports as a condition of employment. Moreover, they should be

allowed to leave their positions or freely terminate their employment with reasonable notice.

- Offer equal opportunities to their employees, protect them from any form any form of retaliation.
- Not treat or propose to treat a person with an attribute unfavourably because of race, ancestry, ethnicity, Indigenous culture, citizenship, creed, colour, age, physical features, sex, sexual orientation including LGBTIQ+ (lesbian, gay, bisexual, transgender, intersex, questioning), lawful sexual activity, gender identity and expression, physical or mental disability, marital status, family responsibilities, pregnancy, breast feeding, carer responsibilities, religion, political opinion, industrial activity or trade union membership, affiliation, or military status.
- Be open and transparent about their recruitment practices, policies and procedures in relation to modern slavery and take steps that are consistent and proportionate with their sector, size and operational reach.

## 6 HEALTH, SAFETY, ENVIRONMENT AND QUALITY (HSEQ)

i24s puts the health, safety and wellbeing of its people, clients and stakeholders first. We treat HSEQ as a priority by actively monitoring, preventing, reducing or removing risks.

Business Partners shall:

- comply with applicable health, safety and environment laws, regulations, industry requirements and client requirements;
- endorse practices that ensure a respectful and safe workplace, and protect anyone who accesses a work site or takes part in a business activity. They will implement standard work instructions and provide appropriate personal protective equipment as well as provide training, procedures and inductions or similar guidance;
- ensure their personnel comply with i24s and client/host site fitness for work and alcohol and other drug (AOD) requirements when working for, on behalf of, or alongside i24s (including site inductions and site entry conditions);
- ensure their personnel comply with lawful and reasonable directions relating to AOD testing (including pre-deployment, random, post-incident, reasonable suspicion/for-cause and return to work testing where required). Refusal to test, failure to cooperate, or any tampering/substitution/adulteration will be treated as a serious breach;
- ensure any worker who may be impaired (including due to medication side effects, fatigue, alcohol or other drugs) does not attend for duty or remains on duty, and cooperate with i24s/client processes for removal from duty, medical assessment/clearance, incident reporting and investigation;
- implement a health and safety management program to drive continual improvement and transparent reporting;
- protect the environment and adopt policies, procedures and systems to conduct business sustainably;
- strive to reduce the environmental impact of their activities as well as care about the communities they operate in, respect their heritage, and listen to their concerns; and

- report any health, safety or environment incidents involving or affecting i24s in accordance with local procedures and contracting requirements.

Business Partners are encouraged to:

- measure, report and reduce their Greenhouse Gas (GHG) emissions;
- evaluate climate risks and opportunities and implement climate resilience measures;
- communicate their commitment to environmental responsibility to management, employees and Business Partners;
- evaluate environmental performance through appropriate audits and issue progress reports; and
- maintain high quality standards, have ISO certification or be on the pathway to obtaining ISO certification.

## 7 REPORTING CONCERNS AND VIOLATIONS

i24s' business operations are conducted using a fair, ethical and transparent approach. We encourage an open and honest workplace and promote a no-blame culture. We will not retaliate, persecute, or punish any person in any way who, in good faith, raises any concerns about this Code or make a notification or report of real or perceived breaches/violations of the Code provisions.

Employees can report suspected concerns or violations, by:

- contacting or speaking to their supervisor; and/or
- contacting or speaking to any of the Co-Founders/Executive Directors.

Appropriate disciplinary action may be taken against Business Partners found to have breached this Code which may include termination of our relationship.

For clarity, serious breaches may include non-compliance with HSEQ requirements or client/host site entry conditions, including refusal to comply with required AOD testing or fitness for work directions while performing work for i24s.

## 8 RESPONSIBILITIES

To achieve the abovementioned business conduct, our leaders and management will:

- inform all relevant parties about the abovementioned Code;
- make this Code available to all parties and to periodically review this Code to ensure it remains accurate and effective.

To fulfill their commitments, employees will:

- comply with the guidelines in this Code; and
- participate in consultation and training in relation to ethical business practices; and
- comply with the rules of this Code.

## 9 GOVERNANCE

The governance of this Code is overseen by the Group's Officer, Angela Kickett. For further information about this Code, please contact i24s on +61 8 9209 2090 or [admin@i24s.com.au](mailto:admin@i24s.com.au)

*Angela Kickett*

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Angela Kickett

Co-Founder/Executive Director

