

CODE OF CONDUCT

December 2024

1. INTRODUCTION, PURPOSE AND SCOPE

The purpose of this Code of Conduct is to give clarity to employees with respect to the ethical principles, values and standard of behaviours expected of individuals in the course of their employment.

Every employee, be they an apprentice, trainee or corporate staff member, has a responsibility to conduct and present themselves and the organisation in a professional manner, and demonstrate respect for all persons, whether fellow employees, clients or members of the public.

This Code of Conduct does not attempt to provide an exhaustive list of expected behaviours in every possible circumstance or aspect of the individual's role. However, it does aim to provide a guide to inform the standard of behaviour and professional conduct expected of employees in relation to their role and responsibilities.

This Code of Conduct applies to all hosted employees (apprentices and trainees) and corporate staff of MIGAS Apprentices & Trainees ("MIGAS").

More broadly, the scope of this Code of Conduct includes all employees of MiGROUP ("The Group") and its subsidiaries encompassing MiTraining, MiRecruit independent contractors, consultants and third parties engaged to conduct business on behalf of the Group.

2. ORGANISATIONAL PURPOSE AND VALUES

The Group observes a set of values that are a guide for holding each other to a higher standard in a way that is always about positive, appropriate behaviour. The organisational purpose and values are aspirational, and it's acknowledged that expressing these values consistently in the workplace takes concentrated effort.

The organisational values (Appendix 1) are written from the perspective of a corporate staff member, but it is expected that hosted employees (apprentices and trainees) make every effort to reflect the themes and intent of the organisational value statements through their own professional conduct and behaviours in the context of the host employer's workplace.

3. ETHICAL PRINCIPLES

A Code of Conduct is designed to provide behavioural standards for employees in the workplace, and in any situation where an individual is acting on behalf of the organisation.

While the ethical principles outlined may seem common sense, it is important to provide clarity about what is acceptable and what is not. This ensures all employees are treated equally and fosters a psychologically safe work environment where the boundaries and expectations are made clear.

The Group has chosen to contextualise the set of ethical principles adopted by the World Health Organisation (WHO) as a global benchmark for good practice:

Integrity

To behave in accordance with ethical principles, and act in good faith, intellectual honesty and fairness.

Accountability

To take responsibility for one's actions and decisions, and their consequences.

Independence and Impartiality

To conduct oneself with the interests of the Group only in view and to ensure that personal views and convictions do not compromise ethical principles, official duties or the interests of the organisation.

Respect

To respect the dignity, worth, equality, diversity and privacy of all persons.

Professional Commitment

To demonstrate a high level of professionalism and loyalty to the organisation, its purpose and objectives.

4. CODE OF CONDUCT

Integrity

- Observe national, state and local laws at all times
- Avoid any action that could be perceived as an abuse of position or authority
- Demonstrate the same standards of integrity in their personal pursuits as they do in the workplace
- Never engage in any level of physical or verbal violence or threat of violence
- Demonstrate the highest standards of integrity when carrying out their role and responsibilities
- Protect the security of any confidential information provided to, or generated by, the organisation
- Report suspected wrongdoing or breaches of the conduct, rules, regulations or policy through established channels
- Demonstrate the same discretion and prudence in their professional and private communications, emails or social media activities

Accountability

- Define clear and realistic objectives and deliverables for their activities in consultation with their supervisors
- Take responsibility for carrying out the duties of their position to the best of their abilities
- Take responsibility for their decisions and for the consequences of their actions
- In the case of supervisors, take responsibility for assessing the performance of staff members in a fair and factual manner, in line with agreed objectives
- Ensure that the human, financial and material resources entrusted to them are used optimally for the benefit of the organisation
- Record all transactions and prepare accurate and complete records, in accordance with established procedures
- Provide advice and guidance to colleagues, where appropriate, and exercise adequate supervision and control over tasks they delegate

- Do not knowingly make comments to the media without seeking appropriate approval, and bear in mind that comments made to the media with respect to personal endeavours may also reflect on the organisation.

Independence and Impartiality

- Disclose promptly and fully any conflict of interest or potential situation of conflict of interest through a form of declaration of interest
- Refrain from seeking or obtaining, under any circumstance, instructions or undue assistance from any government official or from any other authority external to the organisation
- Exercise discretion at all times in their personal political activities and in expressing their personal opinions and beliefs
- Bring any intimate relationship with another staff member or other collaborator to the attention of their supervisor
- Seek written permission from their supervisor before committing to any outside activity
- Decline gifts whose value is more than AUD\$100, unless it would cause embarrassment to refuse, in which case they must declare them to MIGAS HR
- Notify MIGAS HR prior to initiating a political campaign or a nomination process

Respect

- Respect and value differences
- Treat others with tact, courtesy and respect
- Demonstrate awareness that statements or actions not necessarily intended to be offensive to another person may be perceived as such by exercising restraint and refraining from unpleasant or disparaging remarks or actions
- Maintain a professional environment characterised by good working relations and an atmosphere of courtesy and mutual respect
- Abstain from and actively discourage all forms of harassment, including verbal, nonverbal, written or physical abuse
- Never engage in acts of sexual harassment, and report any they become aware of
- Never engage in and report any acts of sexual exploitation and abuse, and report any they become aware of
- Refrain from engaging in gossip
- Never report erroneous facts in bad faith

Professional Commitment

- Deliver on the duties of their position in an ethical and professional manner
- Keep in mind the longer-term objectives of the organisation when managing short- and medium-term activities or operations
- Follow professional developments in their domain of activity to maintain excellent technical standards
- Use their professional expertise constructively for the benefit of the organisation
- Uphold and promote the standards of codes of conduct related to their professional discipline
- Demonstrate openness to new ideas and approaches and favour new thoughts and concepts

5. SAFETY

Our safety objective is that all staff return home safe and well each day.

Maintaining physical and emotional health, and fitness for work, are the responsibility of every individual employee.

All employees are expected to:

- Take reasonable care for the health and wellbeing of themselves and others which includes complying with all reasonable instructions and WHS legislation
- Consider the physical and psychological safety and wellbeing of others before acting
- Report bullying, harassment and any form of discriminatory behaviour immediately
- Ensure that the work premises, including the workspace and equipment, is safe and appropriately maintained before use
- Acknowledge and advise if you are impaired or unfit for work including being under the influence of drugs and alcohol
- Report unsafe work practices and damaged equipment immediately
- Report any near miss or incident where a person is sick or injured in the workplace immediately
- Participate in rehabilitation and return to work programs if sick or injured

Psychological Safety

Psychological safety is a shared belief held by members of a team that others on the team will not embarrass, reject, or punish you for speaking up.

When you have psychological safety in the workplace, people feel comfortable being themselves. They bring their full selves to work and feel okay laying all of themselves on the line.

Harassment, bullying, and discrimination is unacceptable behaviour, and will not be tolerated under any circumstances. This includes the victimisation of any person as a result of making an allegation of harassment, bullying or discrimination.

All employees have a responsibility to uphold this.

All employees will be treated equitably according to their skills, qualifications, abilities, and achievements. The organisation applies the merit principle – treating employees and prospective employees fairly and equitably in all matters, regardless of irrelevant factors such as gender, race, religion, colour, marital status, age, disability, or national origin.

6. STANDARD OF PRESENTATION

Personal appearance, including hygiene and grooming, should be appropriate for your work role and suitable to the circumstances and environment of your workplace.

You should ensure that you are aware of safe and appropriate work wear, including what Personal Protective Equipment (PPE) is required to safely engage in your duties.

7. CONFLICTS OF INTEREST

A conflict of interest refers to a situation where a conflict arises for an individual between two competing interests. These are often, but not exclusively, interests of work duties versus private interests which may include but not be limited to personal relationships, employment outside of the

organisation, and ownership of shares, companies, or property. All employees are expected to report any potential conflict of interest immediately to their supervisor.

Having a conflict of interest is not unusual, and is not necessarily wrongdoing or a form of misconduct. However, failing to disclose and manage the conflict appropriately is considered misconduct. Employees are committed to demonstrating fairness and integrity when fulfilling our responsibilities and should:

- Always disclose a personal interest that could, now or in the future, be seen as influencing the performance of our duties
- Actively participate with our management team in developing and implementing a resolution for any conflict of interest to ensure that any conflict of interest is resolved immediately

8. PUBLIC COMMENT

Unless specifically authorised to do so in your capacity as an employee, personal comments on government policy, community issues, and/or company business should not be made to the media.

Like all members of the community, we have the right to contribute to public discussions on community and social issues in our private capacity. In doing so you will:

- Take reasonable steps to ensure that any comment you make will be understood as representing your personal views, not those of the organisation
- Maintain the confidentiality of information you have access to within your role

Social Media

Social media platforms including (but not limited to) Facebook, TikTok, Instagram and Snapchat, are used widely in our personal and professional lives.

Views, opinions, imagery and comments made on social media platforms are visible to the public or may be reproduced in other forums by those with private access to your personal social pages or feeds. As such, content posted on personal or private social media pages and feeds can be used to bring the organisation into disrepute.

All employees are to be mindful and vigilant about the use of social media and how it may impact on their personal and professional reputation.

Employees are to ensure that professional, private and personal usage of social media does not contravene this Code of Conduct and ethical principles. In particular, social media content shared or posted by an employee that is deemed to be hate speech, racist, derogatory and prejudiced is considered serious misconduct and may result in disciplinary action including termination of employment.

9. CONFIDENTIALITY

Confidential information means all information that is work product, intellectual property and sensitive information related to the organisation. This includes (but is not limited to) salary information, customer data, trade secrets, financial information, product/service innovation, business methods, pricing policy, tenders, and financial information.

Strict confidentiality must be maintained regarding information related to the organisation and used during performing your duties as an employee.

You must immediately notify MIGAS HR if you suspect confidential information has been improperly used, leaked or disclosed to any other party. You must not reproduce or remove from the premises or network any document in any form which contains confidential information without the express consent of the CEO.

10. PRIVACY

All employees will take all reasonable steps to comply with the Australian Privacy Principles to protect the privacy of personal information. If you are in possession of personal information in the course of conducting your role, you should ensure it is only used for the purposes set out in the Privacy Statement on the MIGAS website.

11. MISCONDUCT

Any breach of this Code of Conduct will be addressed lawfully by a senior delegate of the organisation. In the case of alleged serious misconduct, a formal investigation may be undertaken by Human Resources.

In the case of proven misconduct disciplinary action be taken including counselling, mediation, retraining, formal warning, and dismissal. In all instances the organisation will act objectively, fairly, and equitably and in line with the terms detailed in employment contracts, relevant industrial instrument and/or employment legislation.

Complaints, Grievances and Appeals

Issue resolution and escalation processes are detailed within organisational policies and procedures.

Where appropriate communication channels have been exhausted or are inappropriate in the circumstances, you should use the reporting mechanism available through the Complaints, Grievance and Appeals Policy on the MIGAS website.

NOTES

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APPENDIX 1 - ORGANISATIONAL PURPOSE AND VALUES

Purpose

To nurture the self-belief, innate talent and career aspirations of Australia's future trades and non-trades workforce.

Values

We celebrate mateship

Our behaviours and actions embody the character of mateship. What you see is what you get.

We act as one and offer each other unconditional support. We treat others with fairness and trust each other to keep our word. We are adventurous, open-minded and appreciate that our differences are part of what makes us great.

We are sincere, ask for help when we need it, admit to our mistakes, and work to put things right. We don't make false friends and we mean what we say.

We do what is right not just what is expected

We value our co-workers' time and effort, and so we always offer our best work, first time. We build open and honest relationships through communicating. Together we celebrate each other's successes with understated pride. We give credit where it's due, celebrate diversity and critique ideas, not people. We take personal responsibility for achieving our objectives. We act professionally and with conviction in our words and actions.

We keep each other safe

Safety is at the heart of our business and shapes the decisions we make. We talk meaningfully about safe practices and attitudes at every level of the organisation. We give clarity and context to work health and safety to ensure it stays relevant in each of our roles. For us, safety is not just "ticking a box". We personalise safety outcomes and intimately understand our role in preventing and eliminating risks and hazards, every day. We keep ourselves, each other, our apprentices, trainees and customers safe.

We see things through our customers' eyes

Our customers are our host employers. We are accountable for the actions we take to create positive and memorable customer experiences, just as our customers expect us to be accountable to their needs. We approach customer interactions with both physical and mental energy in a way that shows optimism, usefulness and authenticity. When problems arise, we think about things from the customer's perspective. We act quickly and without blame to resolve issues, find compromise, and create solutions. We work hard at earning our customer's trust and loyalty.

We stand up for trade apprenticeships

Our reason for being is to create jobs for apprentices and trainees. Together with our host employers, they sit at the heart of our business. We stand side by side with our apprentices and trainees from commencement to completion. We take great pride in our knowledge of the Australian Apprenticeships sector, and draw on our expertise to educate, guide and delight our clients, peers, staff and stakeholders. We leverage our know-how to position ourselves as the leading employer of apprentices and trainees in traditional trades and complementary industries.