



JustAutomotive recruitment

Just Automotive Recruitment Code of Conduct		
Issue Date: 15/06/2018	Version: 002	Issuer: D Robinson

INTRODUCTION

Just Automotive Recruitment is committed to making positive economic, social and environmental contributions to society, consistent with the principles of honesty, integrity, fairness and respect.

This Code has been developed to provide a set of guiding principles which are to be observed by all Just Automotive Recruitment employees, and against which we hold ourselves accountable.

OUR PRINCIPLES

Just Automotive Recruitment employees are expected at all times to act consistently with the following principles:

1. Act with honesty, integrity and fairness, and be accountable for our decisions.
2. Act in compliance with the law and Just Automotive Recruitment policies and procedures, and do not make or receive improper payments.
3. Seek to make positive and sustainable economic, social and environmental contributions to the communities in which we operate.
4. Respect and maintain privacy and confidentiality of information and accuracy of business records.
5. Identify and manage conflicts of interest.
6. Treat other employees with respect, value diversity and provide a safe working environment.
7. Respect and do not misuse Just Automotive Recruitment resources and information systems.
8. Engage in business relationships professionally and honestly.

1. Act with honesty, integrity and fairness, and be accountable for our decisions

Honesty, integrity and fairness are integral to the way in which our business operates and should guide all our decisions. These values are integral to maintaining the trust of our suppliers, customers, colleagues and the community.

2. Act in compliance with the law and Just Automotive Recruitments policies and procedures, and do not make or receive improper payments

Just Automotive Recruitment employees must be familiar with and comply with all laws and regulations, and the policies and procedures of Just Automotive Recruitment that are applicable to their roles.

A breach of the law can have serious consequences both for Just Automotive Recruitment and for the individuals involved. If there is anything inconsistent between the laws and regulations applying where you work and Just Automotive Recruitment policies and procedures, then you should meet whichever sets the higher standard of behaviour.

Anti-bribery, corruption and extortion

Just Automotive Recruitment employees must not engage in activity that constitutes bribery, facilitation payments, corruption, secret commissions, extortion or money laundering. Such activity is contrary to principles of integrity and fairness and is harmful to Just Automotive Recruitment's reputation amongst customers, suppliers, and the community.

Just Automotive Recruitment employees are required to comply with and uphold all laws against bribery, corruption and extortion and related conduct in all the jurisdictions where Just Automotive Recruitment employees operate.

Just Automotive Recruitment employees must observe the following at all times:

- Do not offer or accept bribes, kick-backs and similar payments. Just Automotive Recruitment employees must never offer or accept any irregular payment to win business or to influence a business decision in Just Automotive Recruitments' favour (such as bribes, 'kick-backs' and similar payments in any form). This restriction also applies to consultants and contractors.
- Do not accept gifts, entertainment or hospitality in breach of our policies - Just Automotive Recruitment recognises that accepting or offering gifts, entertainment or hospitality of *moderate* value is in accordance with usual business practice.
- Do not offer or accept gifts, entertainment or hospitality in circumstances which could be considered to give rise to undue influence. If you are offered gifts, entertainment and hospitality you must notify your supervisor or manager before accepting such

- Do not improperly influence an official. All dealings with politicians and government officers which relate to Just Automotive Recruitment and its business activities must be conducted at arm's length and with the utmost professionalism, to avoid any perception of attempts to gain advantage.
- Recording of business dealings. All business dealings must be accurately documented to reflect the true nature of the transaction.
- Expect the same from third parties as we expect of ourselves. Just Automotive Recruitment employees must take all practical steps to ensure that third parties (agents, contractors, intermediaries or business partners) dealing with or on behalf of Just Automotive Recruitment employees do not engage in conduct that would contravene Just Automotive Recruitments' Anti-bribery values, this policy or any laws.

Just Automotive Recruitment is committed to compliance with the Competition and Consumer Act (CCA) in Australia, and equivalent legislation in other jurisdictions in which Just Automotive Recruitment operates.

The CCA has two main purposes:

- to promote and maintain fair and open competition in the marketplace; and
- to protect consumers by requiring accurate information in the marketplace and fairness in business dealings where there is an inequality in bargaining power.

We respect consumers by providing accurate information, acting in a fair manner in our business dealings and trading independently of our competitors. All Just Automotive Recruitment employees have an obligation to actively promote compliance with the CCA (and equivalent legislation in other jurisdictions, where applicable).

If you are unsure about any matter in relation to Competition and Consumer Laws, you should raise the matter with your supervisor or manager.

3. Seek to make positive and sustainable economic, social and environmental contributions to the communities in which we operate

Just Automotive Recruitment believes that companies have community responsibilities above and beyond the contribution made by their employment and wealth creation activities.

Just Automotive Recruitment is committed to seeking to make positive and sustainable economic, social and environmental contributions in the communities in which we operate and to ensuring that good corporate behaviour is integrated into all aspects of Just Automotive Recruitments' operations.

Just Automotive Recruitments' employees are expected to assist Just Automotive Recruitment in meeting these commitments.

4. Respect and maintain privacy and confidentiality of information and accuracy of business records

Business information

Just Automotive Recruitment employees may come across confidential information, such as technical, strategic or financial information, commercial arrangements or intellectual property.

Just Automotive Recruitment employees must:

1. Use confidential information solely for the purposes of their duties;
2. Preserve the confidentiality of just automotive recruitments' confidential information and ensure that it is not disclosed, except on a "need-to-know" basis to other just automotive recruitment employees or authorised recipients, or as required by law;
3. Maintain the confidentiality of information they come across in dealings with customers, suppliers and third parties; and
4. Not use or modify any confidential information for their own or a third party's interest or benefit.

These confidentiality obligations continue even after the employee has left Just Automotive Recruitment.

Privacy obligations

Just Automotive Recruitment is committed to complying with government legislation governing privacy of personal information obtained by its businesses, and protecting and safeguarding the privacy of people who deal with Just Automotive Recruitment.

All personal information that is collected must be used, stored, handled and updated in line with the company privacy policy.

Business records

We must ensure that we accurately and rigorously maintain all records relating to Just Automotive Recruitment' business and its operations.

5. Identify and manage conflicts of interest

Our personal interests should not conflict with our duties and obligations to Just Automotive Recruitment. A conflict of interest may arise if you have a direct or indirect (through a family member, friend or associate) financial interest in a business that has commercial arrangements with Just Automotive Recruitment.

To manage conflicts of interest, Just Automotive Recruitment employees must:

- Disclose any actual or perceived conflicts of interest to your supervisor or manager.
- Seek approval from your supervisor or manager, as the case may be, before accepting any outside business interests including non-just automotive recruitment work, business ventures, directorships (other than to a board of a non-trading family company), partnerships or other interests which have the potential to create a conflict of interest.
- Keep an arm's length relationship when dealing with customers and suppliers.

6. Treat other employees with respect, value diversity and provide a safe working environment

Diversity

Just Automotive Recruitment does not tolerate unlawful discrimination, bullying, harassment or other unacceptable conduct. We can create a diverse and supportive environment by:

- Supporting each other and working collaboratively.
- Ensuring that we do not unlawfully discriminate against, bully or harass our colleagues or anyone else in the workplace.
- Making employment decisions based on merit and performance.

Safe working environment

Just Automotive Recruitment will provide a safe working environment and comply fully with all local and national laws and regulations regarding safety in the workplace.

Just Automotive Recruitment employees will:

- Report health and safety issues - taking responsibility for safety by reporting any health or safety issues immediately;
- Abide by health and safety policies - abide by just automotive recruitment' health and safety policies and follow safety instructions at all times;
- Comply with just automotive recruitment alcohol policy. Where permitted at a just automotive recruitment' site or function, alcohol must be served and consumed in a responsible manner; and
- No smoking - not smoke during work hours outside of permitted breaks at any premises, sponsored function or activity.

Just Automotive Recruitment has a zero tolerance policy towards illegal drug possession and use, and the misuse of prescription drugs, at work whether on Just Automotive Recruitment' premises, when conducting business on behalf of Just Automotive Recruitment or at Just Automotive Recruitments-sponsored functions or activities.

7. Respect and do not misuse Just Automotive Recruitment' resources and information systems

Just Automotive Recruitment employees must use Just Automotive Recruitment's property, funds, facilities and services for authorised purposes and not for personal benefit, or the benefit of unauthorised third parties. Just Automotive Recruitment regards the unauthorised removal of equipment, supplies and other resources belonging to Just Automotive Recruitment as theft.

Any transactions or disposals of Just Automotive Recruitments' property or resources must be approved by senior management and accurately recorded in financial records.

Information Systems

Email, the internet, facsimile, telephones and other Just Automotive Recruitment information systems must be used appropriately so as to maintain and not put at risk the integrity of the Just Automotive Recruitment information systems.

Bring Your Own Devices

Just Automotive Recruitment employees linking personal devices to the Just Automotive Recruitment information systems must ensure they first obtain appropriate authorisation and use such personal devices for relevant employment related purposes only while linked to Just Automotive Recruitments' information systems.

Social Media/Networking

Just Automotive Recruitment employees must ensure that they use any social media and networking sites in accordance with the requirements of the Code of Conduct and relevant information technology and media policies.

8. Engage in business relationships professionally and honestly

From time to time Just Automotive Recruitment engages agents, contractors, consultants and other intermediaries (external employees).

It is our policy to deal fairly and honestly with all External Employees and ensure that all relationships with External Employees are based on price, quality, service and reputation.

Improper conduct by External Employees may expose Just Automotive Recruitment to legal liability or reputational damage. Just Automotive Recruitment is committed to the safe and

ethical manufacture and supply of goods and services, and reserves the right not to do business with External Employees who do not share and demonstrate this commitment.

Who does this Code apply to?

This Code applies to anyone who is employed by Just Automotive Recruitment.

This Code applies to you whenever you are identified as a representative of Just Automotive Recruitment. In some circumstances, this will include times when you are outside of your workplace or working hours.

Agents, contractors, consultants and other intermediaries are also expected to know and observe the principles set out in this Code and should be made aware of this Code or the relevant divisional/business unit Code when we engage them to work with us.

Where can I get a copy of this Code?

A copy of this Code can be found in the Just Automotive Recruitment policy manual and the Just Automotive Recruitment website. A copy of this Code will be provided to all new employees when they join Just Automotive Recruitment.

Adherence to this Code

This Code has the full support of the Just Automotive Recruitment Managing Director and compliance with this Code is taken very seriously.

As a measure of accountability, compliance with this Code is monitored by Just Automotive Recruitments Managing Director.

If you breach this Code you may face disciplinary action, including termination of your employment. If the situation involves a breach of law or other regulation, the matter may also be referred to an appropriate law enforcement authority.

Who you can speak to

You have a responsibility to immediately report any breaches of this Code by a colleague to your immediate supervisor or manager, and you should also report conduct where you are unsure whether a breach of this Code has occurred.

All reports will be kept confidential and no employee will be disadvantaged or prejudiced by reporting in good faith a breach or suspected breach of a law, regulation, or of this Code.

Just Automotive Recruitment seeks the co-operation, commitment and support of all employees who are involved with the activities of Just Automotive Recruitment in complying with our Code of Conduct.

For further information on Just Automotive Recruitments Code of Conduct, please contact donna@justautomotiverecruitment.com.au