

Code of Business Ethics



From our Managing Director

Great companies are built on integrity and respect. Projects Queensland is proud to have established strong relationships with clients, customers, shareholders, employees, legislative bodies and local communities. In order to maintain these critical relationships, it is vital we maintain the highest standard of ethical conduct in our daily activities. This is an important part of Projects Queensland's way of conducting high quality business.

Our Code of Business Ethics policy contains the rules that everyone who represents our company must adhere to understand and follow throughout our business process. Our Code may not cover all possible ethical issues that may arise along the way, however, we ensure it provides the basic principles that should guide our conduct by means of common sense, good judgment and integrity against business problems encountered and henceforth the Code ensures our decisions are in line with our values. In case of any doubts on what to do in a given situation, I ask all our business associates (clients, suppliers and employees) to seek guidance from myself personally or our General Manager. It is everyone's responsibility to be sensitive to situations that may lead to illegal or improper actions. Do not hesitate to communicate any possible violation of our ethics rules to myself directly via email (brad@projectsqld.com.au) and rest assured your communication will be maintained confidentially at any cause. Always remember, your individual actions reflect the company. You must avoid any actions that may even look improper.

We stand for true value in a changing world, and our future prospects have never been more promising. Our continuous success and good reputation absolutely depend on the behavior of each person in the company. Nothing is harder to win or easier to lose than a company's integrity reputation. Our Board of Directors fully supports the Projects Queensland Code of Business Ethics program and remains actively involved in it. At Projects Queensland, we believe that current and potential customers recognize our integrity as the best in the industry and this is great for our employees, shareholders and other stakeholders. To ensure our continued success and help us build a better tomorrow, we must adhere to both the letter and spirit of our Code every day.

Brad Dunne
Managing Director

Projects Queensland's Responsibility to Employees

Because we seek to attract and retain the best people in the professional services industry, our employees are our most valuable asset. Consequently, we will treat one another with respect and fairness, and that we can foster an environment of open communication and honesty.

Anti-discrimination

This is to establish the responsibilities, controls, processes and procedures for maintaining the company's professional standards and accurate record keeping in relation to all anti-discrimination and complaint requirements. Discrimination occurs when a person, or group of people, are treated in a less favorable way than another person, or group of people, would be in a comparable set of circumstances. The Company observes the provision and spirit of Anti-Discrimination legislation and is committed to promoting non-discriminatory work practices. Where complaints of discrimination do arise, these will receive prompt and proper investigation.



Guidelines: The Anti-Discrimination Act of 1991 applies Australia wide.

- Race, sex, marital status, disability, sexual preference, parental status, religious or political conviction, as they relate to employment and staff development.
- The development and provision of conditions of service should not discriminate on the basis of the above grounds.
- All recruitment, selection and staff development activities need to conform to the legislation and should be carried out on the basis of merit.
- Where discrimination affects a person or group of people covered by legislation, the action is illegal.
- Employees, job applicants, members and their guests and other visitors have a legal right to make a complaint where they feel they have been discriminated against.
- Stereotyping and harassment are considered acts of discrimination. Guidelines for dealing with harassment complaints are provided in the Harassment Policy.
- Complaints may be made to the Company either directly or through a government anti-discrimination authority.
- It is illegal to subject a person to harassment on the basis of their having made a complaint.

Policy against harassment

Projects Queensland promotes a working environment free of intimidation, threat and humiliation. Bullying & Harassment towards either workers or members of the public is not tolerated. Supervisors are accountable for ensuring that proper standards of conduct are maintained in the workplace and that harassment in any form is not acceptable. Complaints of bullying/harassment must be investigated immediately by the supervisor or manager with due regard to the sensitivity and the privacy and rights of the individuals concerned. Appropriate counselling and disciplinary action are taken as necessary



Harassment and bullying can take many forms including but not limited to:

- verbal abuse including whistling or threats
- unwelcome and offensive remarks, jokes or innuendo
- displaying sexually suggestive or racist media (including materials transmitted via the Internet and/or e-mail)
- practical jokes which cause awkwardness, embarrassment or distress

- unwelcome invitations, requests, intimidation or suggestive behaviour
- unnecessary and unwelcome physical contact such as touching, patting or pinching
- physical assault

Bullying / Harassment, including sexual harassment, can involve behaviour that is regarded as common place or “normal” to some and may be meant in good fun but may be deeply distressing or offensive to others. This policy extends to materials drawn from and transmitted by the Internet and e-mail.

Under both Federal and State legislation in Australia, sexual harassment is a form of discrimination and is illegal. Harassment on the grounds of race, gender, marital status, pregnancy, physical and mental disability, political or religious beliefs, and sexual preferences also constitutes unlawful discrimination and is illegal. Regardless of whether behaviour is illegal or not, any behaviour that creates an offensive work environment is not acceptable and will not be tolerated.

Whistle-blowers Policy

Corporate governance is important to Projects Queensland. Employees should, in the first instance, report your concerns to management who will treat the matter with complete confidence. If you are not satisfied with the explanation or reason given to you, you should raise the matter with the appropriate organization or body, e.g. the police, the Environmental Protection Agency or the Health & Safety Regulator.



If an employee believes that the Employer or any of its Officers or staffs is involved in any form of wrongdoing such as:

- Committing a criminal offence;
- Failing to comply with a legal obligation;
- Endangering the health and safety of an individual;
- Environmental damage;
- Slander/ defamation of character; or
- Concealing any information to the above.

Privacy and personal data protection

We respect our employees' right to privacy established by the applicable laws. We are committed to maintaining the privacy and security of all personal data that we hold, and our employees must follow our security procedures relating to the handling and protection of other employees' personal data. We take appropriate security measures to safeguard personal data and ensure that it is not deliberately or accidentally accessed or compromised in any manner.



The record-keeper who has possession or control of a record that contains personal information shall ensure:

- The record keeper shall take reasonable steps to safeguard security of said documents against loss, unauthorized access, use, disclosure, or modification and against other misuses; and
- That if a record (in connection with the provision of a service to the record keeper) is given to a person; everything reasonable within the power of the record keeper shall be done to prevent unauthorized use or disclosure of information contained in the record.

The record-keeper who has control or possession of a record that contains personal information shall not disclose the information to a person, body or agency (other than the individual concerned) unless:

The individual concerned has consented to the disclosure;

- The individual concerned is reasonably likely to have been aware, or made aware under section 2, that the information of that kind is usually passed to that person, body or agency;
- The record-keeper believes on reasonable grounds that the disclosure is necessary to prevent or lessen a serious or imminent threat to the life or health of the individual concerned or of another person;

- The disclosure is required or authorised by under law; or
- The disclosure is reasonably necessary for the enforcement of the criminal law or of a law imposing a pecuniary penalty, or the protection of public revenue.
- Where personal information is disclosed for the purposes of enforcement of the criminal law or of a law imposing a pecuniary penalty, or for the purpose of protection of the public revenue, the record-keeper shall include in the record containing that information a note of the disclosure.

A person, body or agency to whom personal information is disclosed under section 1 of this document shall not use or disclose the information for the purpose other than the purpose for which the information was given to the person, body or agency.

Mental Wellbeing Policy

Mental ill health and stress are associated with many of the leading causes of disease and disability in our society.



Promoting and protecting the mental wellbeing of the workforce is important for individuals' physical health, social wellbeing and productivity. Many factors in the workplace influence the mental wellbeing of individual

employees, departments or organisations. Understanding and addressing the factors which affect people's mental wellbeing at work have a wide range of benefits, both for individuals and the organisation. Mental wellbeing in the workplace is relevant to all employees and everyone can contribute to improved mental wellbeing at work. Addressing workplace mental wellbeing can help strengthen the positive, protective factors of employment, reduce risk factors for mental ill health and improve general health. It can also help promote the employment of people who have experienced mental health problems and support them once they are at work.

Providing support to employees through:

- providing a work environment that promotes and supports mental wellbeing for all employees.
- offering assistance, advice and support to people who experience a mental health problem while in employment.
- support for staff returning to work after a period of absence due to mental health problems.

Promoting the mental wellbeing of all staff through:

- providing information and raising awareness about mental wellbeing
- providing opportunities for employees to look after their mental wellbeing
- promoting policies and practices that promote wellbeing

To provide support and assistance for employees experiencing mental health difficulties.

Policy actions:

- Ensure individuals suffering from mental health problems are treated fairly and consistently and are not made to feel guilty about their problems.
- Encourage staff to consult the occupational health department (if there is one), their own GP, or a counsellor of their choice.
- Investigate the contribution of working conditions and other organisational factors to mental ill health and remedy this where possible.
- In cases of long-term sickness absence, put in place, where possible, a graduated return to work program
- Make every effort to identify suitable alternative employment, in full discussion with the employee, where a return to the same job is not possible due to identified risks or other factors.
- Treat all matters relating to individual employees and their mental health problems in the strictest confidence and share on a 'need to know' basis only with consent from the individual concerned.
- Identify all workplace stressors and conduct risk assessments to eliminate stress or control the risks from stress. These risk assessments will be regularly reviewed.
- Manage conflict effectively and ensure the workplace is free from bullying and harassment, discrimination, and racism.
- Provide confidential counselling for staff affected by stress caused by either work or external factors.
- Establish good two-way communication to ensure staff involvement, particularly during periods of organisational change.



To develop a culture based on trust, support, and mutual respect within the workplace. As an employer we aim to create and promote a culture where employees are able to talk openly about their job and mental health problems and to report difficulties without fear of discrimination or reprisal.

Everyone has a responsibility to contribute to making the workplace mental wellbeing policy effective. Managers have a responsibility to:

- Monitor the workplace, identify hazards and risks and take steps to eliminate or reduce these as far as is reasonably practicable.
- Ensure good communication between management and staff, particularly where there are organizational and procedural changes.
- Assist and support employees who are known to have mental health problems or are experiencing stress outside work – for example due to bereavement or separation.
- Ensure staff are provided with the resources and training required to carry out their job.
- Monitor workloads to ensure that people are not overloaded.

- Monitor working hours and overtime to ensure that staff are not overworking and monitor holidays to ensure that staff are taking their full entitlement.
- Ensure staff are provided with meaningful developmental opportunities.
- In addition, senior management will ensure that staff performing a management or supervisory function have sufficient competence to discharge that function in a manner consistent with the maintenance of mental health in the workplace.
- Provide advice and support to employees and managers in relation to this policy.
- Monitor and report on levels of sickness absence which relate to mental health problems including stress-related illness.

Projects Queensland's Responsibility to Vendors and Marketplace

In maintaining the highest standards of integrity in our business practices and carefully selecting vendors during business collaboration, we at Projects Queensland consider Fairness and impartiality at all stages throughout our procurement processes.

Antitrust and Fair dealing

We always treat our customers and suppliers and competitors fairly. We strictly do not encourage taking advantage of any individual or firm by manipulating, hiding, misuse of privileged information, misrepresentation of material facts or any other dishonest practice. We comply with the Anti-competitive law (including those which relate to price discrimination, price fixing, restraint of trade, market allocation schemes and monopolies) throughout our business process.

We ensure the following in all our business dealings:

- Make clear to all suppliers and representatives from marketplace that we expect them to compete fairly and vigorously for our business.
- Not discuss with our competitors pricing or any matter affecting pricing with the intention of price fixing, setting minimum prices or establishing other business terms in a market where we compete.
- Engage in accurate and truthful marketing and advertising. It is never acceptable to use deliberately misleading messages, omit important facts, or make

false claims about Projects Queensland or our competitors.

- Build long-term relationships with our clients by demonstrating honesty and integrity



Gathering market information about the our competitors is legitimate business activity carried out ethically and lawfully, we do not encourage our employees to gather competitor's information through improper channels, such as gaining access to competitor's any sensitive and confidential information, directly or through third parties, misrepresenting a competitor's employee to access any vital information. We do not request any employee who previously worked for a competitor to do anything that would violate his or her ethical obligations to that competitor.

Anti -bribery and Anti-corruption

Corruption refers to behavior lacking in honesty and integrity and particularly relates to the giving of bribes to those in power in return for corporate or personal gain. Bribery occurs when someone offers, pays, seeks or accepts a payment, gift or favors to influence a business outcome inappropriately.

Projects Queensland does not tolerate bribery or corruption of any form. All employees, and third parties associated with Projects Queensland, are expected to conduct themselves with the highest ethical standards at all times, and not engage in any activity (either directly or indirectly) which is, or could be perceived to be, corrupt, improper or unlawful. PQ does not offer any promise to make any illegal, improper, or questionable payment or commitment of personal or company funds or other valuable consideration to clients, vendors, governmental officials, or anyone else anywhere in the business process for the purpose of obtaining or retaining business or securing any improper advantage.



Projects Queensland strictly dose not (either directly or indirectly):

- in anyway be involved in the giving or receiving of a bribe, regardless of any local custom or practice and regardless of the size of the bribe;
- bribe another person intending to obtain or retain a business or other advantage for the business;
- offer, promise or give a financial or other advantage to anybody intending that he/she does something improperly for the benefit of the organization or individual:

- request or accept benefits from anyone on a scale that might be seen to create an unreasonable obligation to that party or create a conflict of interest for Projects Queensland

We will not do business with others who are likely to harm PQ's reputation. For example, we will avoid doing business with any company or person who intentionally and/or continually violates the law. We also will not hire a third party to perform any acts prohibited by law or prohibited by our Code. We carefully consider the clients, vendors, agents, consultants, subcontractors, and alliances with which PQ associates.

Raising Concerns

All employees have a duty to avoid corrupt behaviour and to behave ethically. However, in addition to being accountable for personal actions, it is a 'must do' to all employees take responsibility for reporting the inappropriate behaviour of others, including our Business Associates. Any such report made will entirely be treated confidentially. Knowing about possible corrupt conduct and failing to notify anyone from the selected group below will be regarded as a serious matter and disciplinary action may be taken, including dismissal. Any employee who has any concerns that corrupt conduct is going on within Projects Queensland, by employees, by our third-party business associates or in respect of any other dealings between PQ and a third party, he/she must immediately raise their concerns through one of the following channels:

- Brad Dunne, Managing Director-
brad@projectsqld.com.au

- Craig Stewart, General Manager-
craig@projectsqld.com.au
- Sandra Lysaght, Finance Manager-
sandra@projectsqld.com.au

Alternatively reach out to our head office phone in order to connect with the above +61 7 5564 4214