

Celebrating Over 30 Years.

**INFINITY**  
Build. Above. Beyond.



Code Of Conduct



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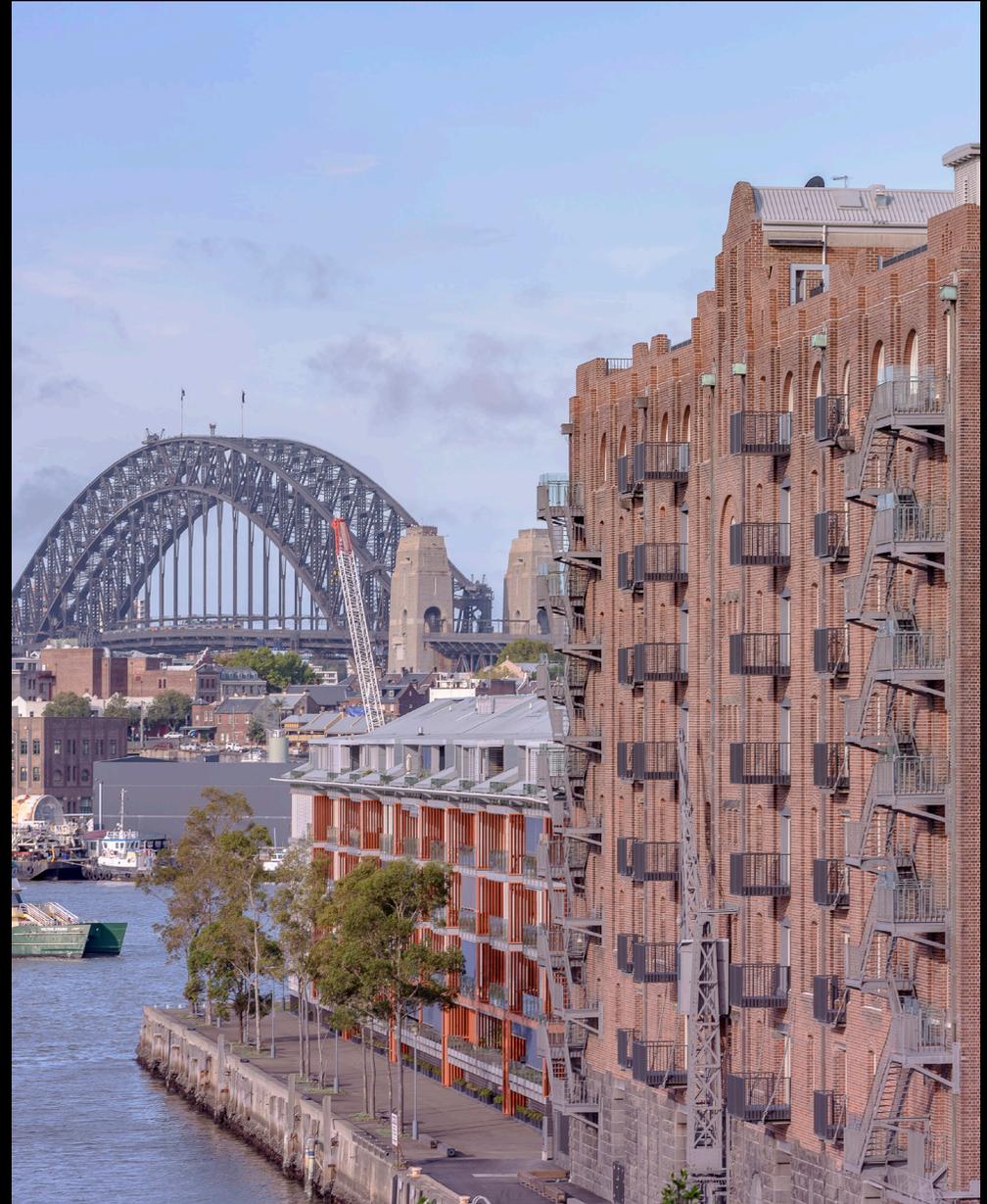


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# INTRODUCTION





## OUR PURPOSE

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The purpose of the Code of Conduct is to help us understand how we should respond to certain situations whilst working at Infinity Constructions Group and Infinity Constructions Group Melbourne (referred to together as ICG) and outlines the expectations regarding employee behaviour towards their colleagues, managers and the overall company.

At ICG, we promote freedom of expression and open communication, however all employees need to follow the Code of Conduct. Employees should avoid offending, participating in serious disputes and disrupting our workplace. We also expect them to foster a well organised, respectful and collaborative environment.

This guide contains the details on the standards of ethics, conduct and behaviour that you must comply with as a condition of your employment or appointment. It sets out general standards of behaviours which employees are expected to maintain.

Along with our policies and relevant state and federal legislation, our Code of Conduct governs the way we conduct business and all employees are required to comply with standards.

All employees must protect our company's legality. They should comply with all environmental, safety and fair dealing laws. We expect employees to be ethical and responsible when dealing with our company's finances, products, partnerships and public image.

To ensure that you give yourself the best chance of success at work, please familiarise yourself with this Code of Conduct and ICG's policies and procedures which are located on the company intranet and on the Company HR System, ELMO.

The Code of Conduct including any policies, procedures and standards referred to in this guide apply to all new and existing employees. Failure to comply with any of the standards of ethic referred to in this guide maybe subject to disciplinary action, including termination of employment.

## OUR MISSION

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To maintain trustworthiness by working with all our stakeholders to deliver our projects with excellence, cooperation and collaboration, cost effectiveness, on time, with the desired quality and the highest level of workplace health and safety.



## OUR VISION

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To be recognised by our Clients, Consultants, Subcontractors, Suppliers, the Community and Employees as a Trustworthy Business Partner.

## OUR VALUES

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At Infinity Constructions Group (ICG) we pride ourselves on the 4 core values that shape the culture of our company and ensures that all of us are working towards the same goal.



### Safety

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Safety is everyone's responsibility and will always take priority. Safety must be at the heart of everything that we do. Safety takes priority over all other considerations. Without this commitment we cannot be a high performing organisation and we cannot gain or maintain the trust of any of our Stakeholders.



### Accountability

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We are accountable for the buildings we build, the way we operate and the outcome of our actions. Our buildings are there for the long term and we respect our clients and those who will occupy those buildings – we are proud of what we build now and for the next generation.

All of our processes including marketing, business development, estimating, contract administration, construction and post-construction operations are to be based on constructing buildings and being accountable for the quality and satisfaction of our Clients and other users.

This will encapsulate our target market, developing business with "Infinity Worthy Clients", pricing our projects to allow us to build them correctly, procuring the correct subcontractors and suppliers including giving the opportunity to be able to price the works correctly via good design and scopes of work, by programming and coordinating the works for the best quality outcome and addressing any problems early and expeditiously.



### Sustainability

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Our business must always remain sustainable. Sustainability is achieved when all our processes come together to deliver efficiency and value.

Sustainability means that we can continue operating into the future without fear of setbacks which will inevitably come.

Being sustainable includes experienced, committed, loyal and skillful management and workforce, financial strength, loyal and extensive client base, non-reliance on any individual, being able to innovate and a strong forward order book.

Innovation, Environmental Sustainability and Social Responsibility in a wider sense, is now very much a requirement for companies to remain relevant and to survive into the future.



### Trustworthiness

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Trust in us and from us is the fundamental ethos of Infinity's culture. In everything we do, we gain, maintain and foster trust.

Relationships built on trust with all our stakeholders are fundamental to our business model. It is imperative, in order for us to not solely compete on price, that our name and reputation in the wider industry is synonymous with trust.

Trust comes from us delivering what we promised. Whether that is in the form of a construction contract, acceptance of approval conditions, abiding by the laws of the land, conformance with our core values and abiding by our agreements to our employees, subcontractors and suppliers.

# CODE OF CONDUCT



## JOB DUTIES & AUTHORITY

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All employees should fulfill their job duties with integrity and respect towards their peers, stakeholders and the community.

Managers must not abuse their authority.

Managers are expected to delegate duties to their team members taking in to account their competences and workload. Likewise, we expect team members to follow team leader instructions and complete their duties with skill and in a timely manner.



## YOUR PROFESSIONALISM

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All employees must show integrity and professionalism in the workplace. Employees are expected to follow company rules and complete all tasks and projects.

Employees are expected to follow through on projects and tasks and admit when a mistake is made.

When an employee finds themselves at a crossroad between right and wrong, they should refer to the company policies and report anything that does not feel right. Employees should ask for help if they are unable or unsure on how to handle a situation.

## ATTENDANCE & REPORTING FOR WORK

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It is every employee's responsibility to report to work at the required time to complete their duties. We expect employees to be punctual when coming to work and to attend work regularly.

Regular absenteeism and tardiness puts an unnecessary strain on colleagues and has a huge impact on business continuity.

We understand that from time to time an employee faces a situation where they are unable to report for duty at the required time, if this is the case, an employee must immediately call their manager, supervisor or other authorised person to advise them of their circumstances.

Refer to the Attendance and Punctuality Policy for more information.

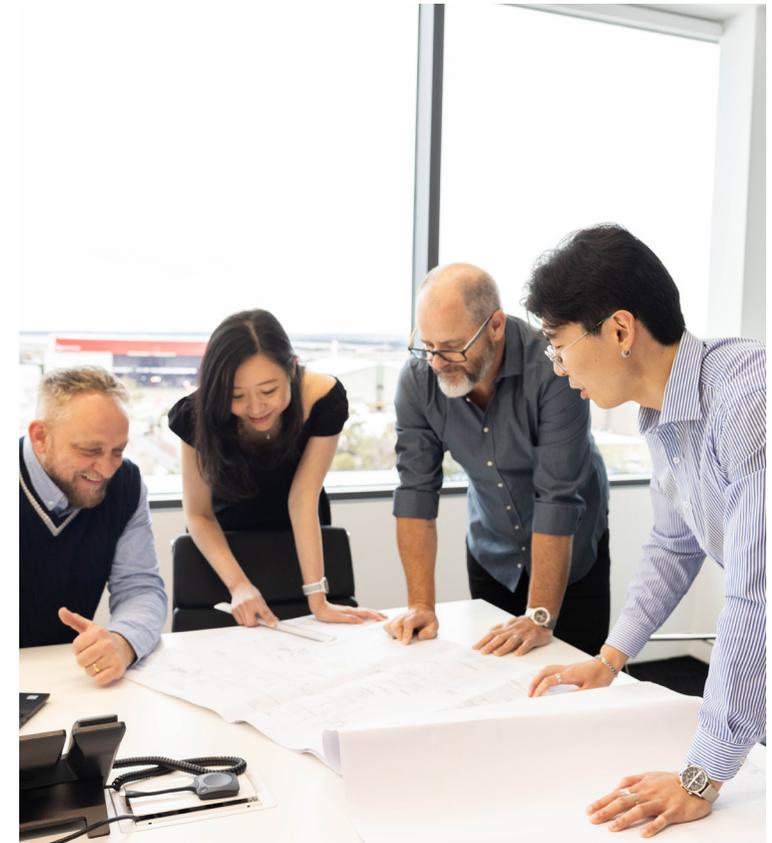


## PHYSICAL APPEARANCE

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Employees are expected to always dress appropriately, appear fit for business and maintain high standards of personal hygiene. Employees represent ICG and how they present themselves to colleagues, stakeholders, clients and others has an impact on the Company.

ICG provides all employees with a choice of at least 2 polos for office-based staff, 5 polos/hi-vis tops for site based staff as well as 2 jackets for all staff. Although not compulsory to wear in the office daily, we expect that those who don't wear the Infinity branded clothing demonstrate good judgment, conservatism and professional taste when choosing their clothing.



## COLLABORATION

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Employees should be helpful and collaborative.

Employees are encouraged to work together through idea sharing and thinking to accomplish a common goal. They should not disrupt the workplace or present obstacles to their colleagues' work.

## HEALTH & SAFETY

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ICG is committed to achieving the highest possible health and safety standards for our employees, contractors, suppliers and clients.

All employees, contractors, suppliers and clients of ICG are required to abide by the health and safety rules and regulations which are either supported by State or Federal legislation or ICG's Health and Safety procedures which are outlined on the company's intranet.

To ensure that everyone can do what is expected of them, regular training in safety will be provided along with tools to help you work safely.

Any concerns around health and safety, or suggestions for improvement raised by you will be taken seriously and actioned as appropriate.

ICG drives continuous improvement in health and safety through the monitoring of safety objectives and targets. We continuously monitor, audit and review our health and safety management system to ensure ongoing improvement.

We all, regardless of work location, have a role to play in ensuring our people return home safely after work.



## EQUAL EMPLOYMENT OPPORTUNITY & DIVERSITY

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Equal Employment Opportunity (EEO) is about treating employees and potential employees fairly and equitably regardless of their age, sex, race, nationality, political views, industrial relations activities or other attributes associated with discrimination, during all aspects of employment.

ICG is committed to complying with the provisions as stated in the relevant Federal and State legislations regarding Diversity and Equal Employment Opportunities.

Refer to the Equal Employment Opportunity (EEO) Policy for more information.



## COMMUNICATION

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Workplace communication is important to ICG because it increases productivity, commitment and morale. All employees must be open for communication with their colleagues, managers or team members.

## WORKPLACE BEHAVIOURS

ICG is committed to providing a workplace where all employees, potential employees, clients, consultants, sub-contractors, suppliers and other external parties are free from unlawful discrimination, harassment, bullying, victimisation, vilification and violence. No one should ever feel uncomfortable in the workplace and should always be able to raise concerns in a safe forum. ICG has policies and procedures in place that outlines the process of how to raise these matters in a safe and confidential way.

If you feel victimised or see this type of behaviour in the workplace, you have a right to raise a complaint or grievance and have your matter heard fairly and impartially by the company.

You should never feel uncomfortable at work and should always be able to raise your concerns. While it can be challenging to raise issues like this, you should first try to resolve the issue with the individual(s) involved. If that does not resolve the situation then bring this issue to the attention of your manager. If you do not feel comfortable in raising this with your manager, then bring the situation to the attention of the Talent and Culture Manager. ICG does not condone this type of behaviour and will seek to rectify it as soon as possible.

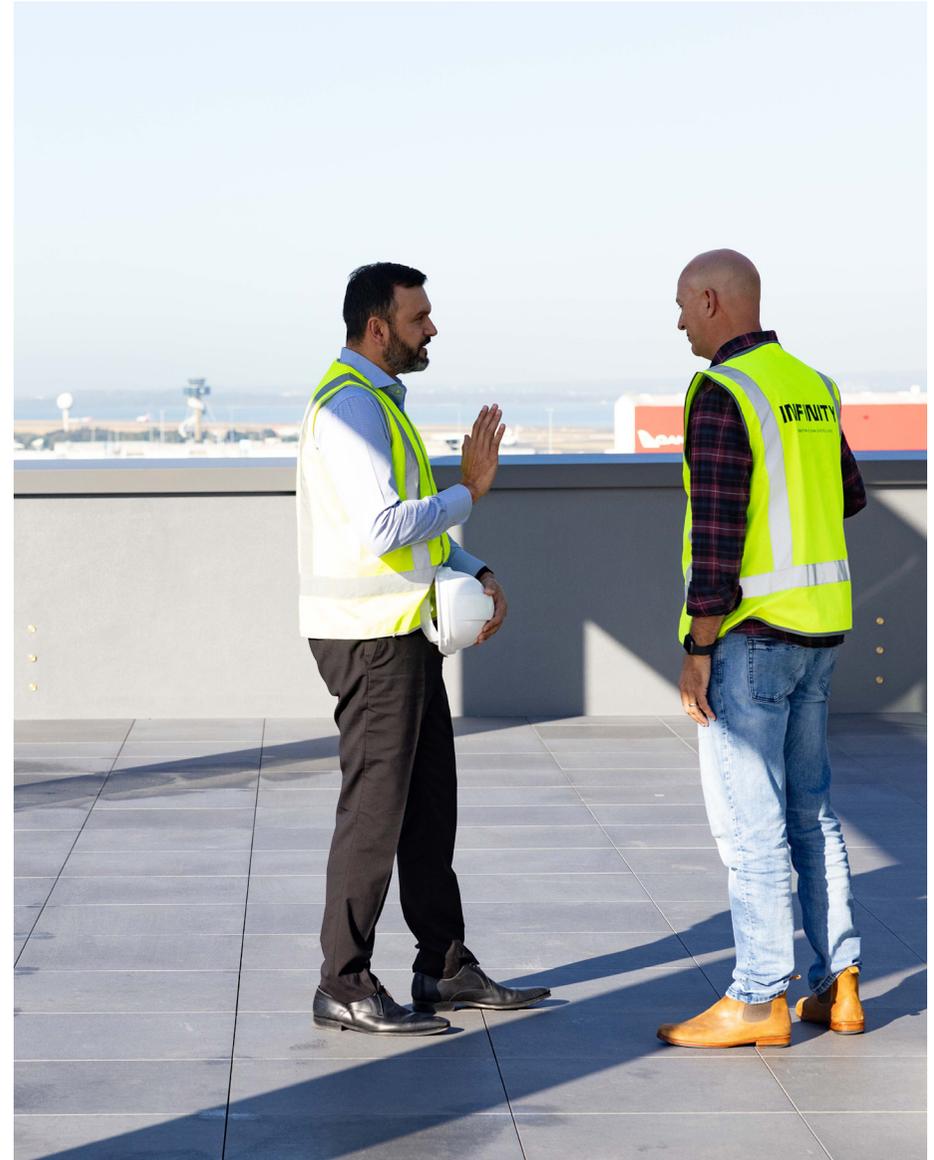
Refer to the Workplace Bully, Harassment and Discrimination Policy for more information.

### ALWAYS:

- Treat everyone with respect, professionalism, integrity and courtesy;
- Support and promote ICG's commitment towards workplace behaviour;
- Comply with all applicable anti-discrimination, bullying and harassment legislations; and
- Treat individuals in a non-discriminatory manner in all aspects of employment such as recruitment, training, promotion, transfer and termination.

### NEVER:

- Discriminate, harass, bully, vilify, victimise, threaten or act violently towards another employee or anyone else; and
- Put up with unlawful or unethical workplace behaviours.





# OUR PRIVACY



## OUR PRIVACY

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During the course of your employment with ICG, you may come in contact with or have access to confidential or personal information regarding ICG, its employees, suppliers, customers and/or clients.

Private or personal information is strictly confidential and must not be used or divulged (directly or indirectly) by employees either during or after their employment or appointment with ICG.

All ICG employees are bound by this policy and the Privacy Amendment (Private Sector) Act 2000. The Act has no set time limit and therefore extends to all existing and previous employees.

Refer to the Privacy Policy for more information.

## BRIBERY & COMMISSIONS

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ICG is committed to complying with the law and ensuring the highest standards of honesty and integrity in all its activities. Employees should not accept gifts from clients or partners where it may be seen or perceived as an inducement or reward in order to gain commercial, contractual, regulatory or personal advantage.

A bribe (or bribery) means the giving, offering, promising, requesting, agreeing to receive or acceptance of any advantage, which need not be financial, including any payment gift or loan to induce an individual to act dishonestly.

A bribery can include facilitation of payments and secret commissions. A bribery may be direct or indirect, for example a bribe through a third party.

You must not offer, promise, give, request, accept or agree to receive a bribe whether directly or indirectly. You must not offer to make a secret commission or engage in any acts of fraud or corruption.

ICG recognises that in some cases, demands from bribes may be accompanied by a threat including physical violence. The health and safety of our people comes first, therefore if you are ever exposed to such demands, do what you need to do to stay safe and report it to the Managing Director straight away.

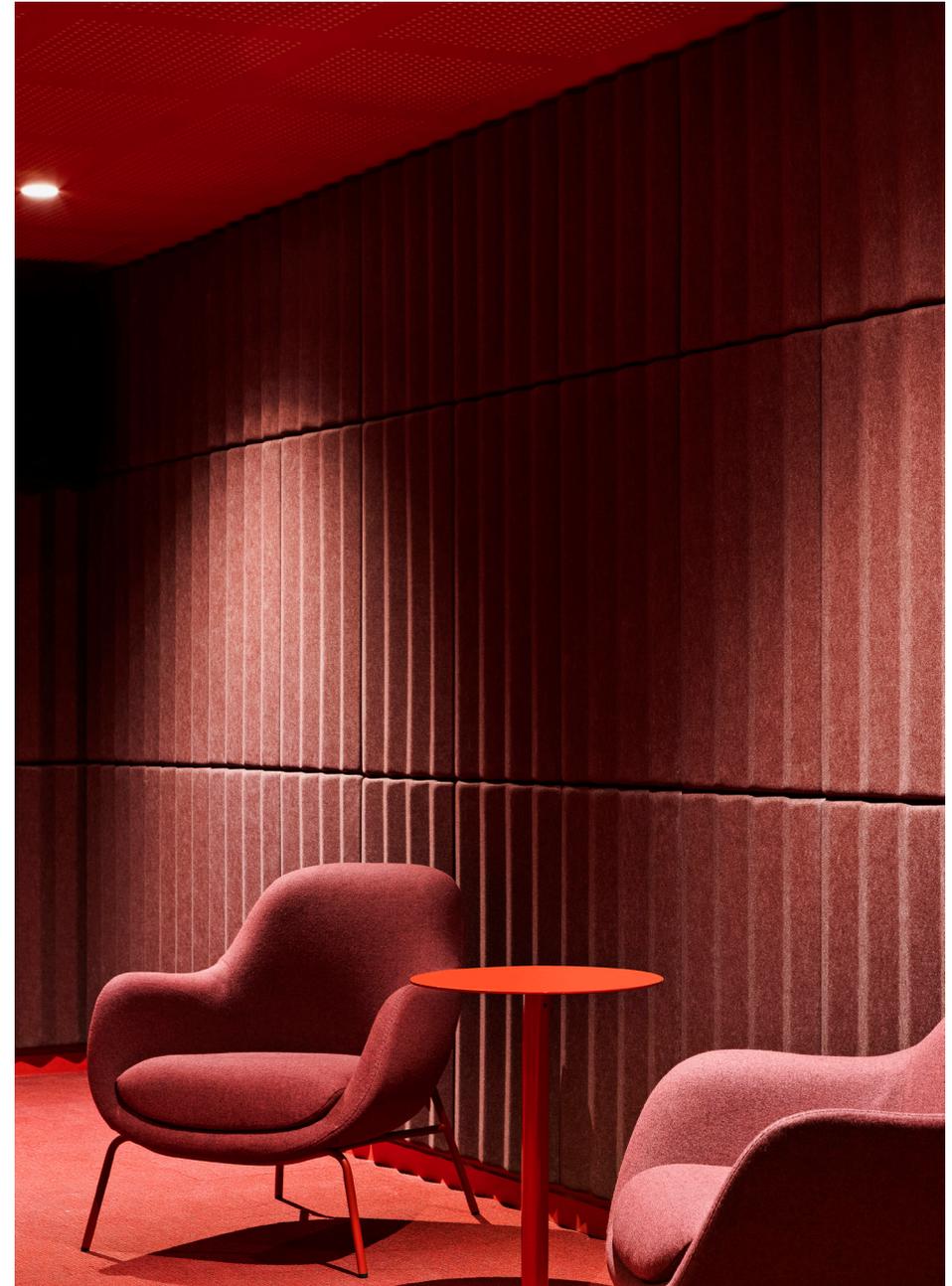
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### ALWAYS:

- Alert your manager if you are ever included in discussions about bribes or suspect someone you know at ICG is involved in planning or making bribes; Report it immediately if a bribe is demanded of you or someone you know;
  - Refuse a bribe if offered to you by a supplier or other contractor; and
  - Ensure you keep record of all business transactions as required by your role.
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### NEVER:

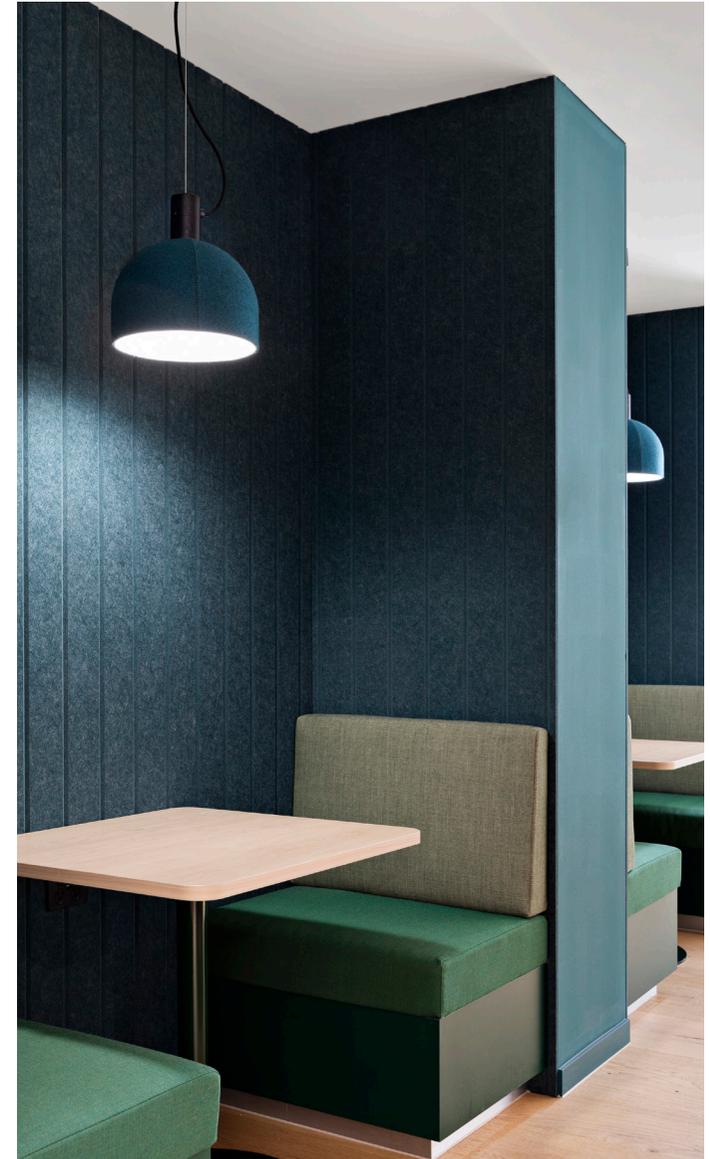
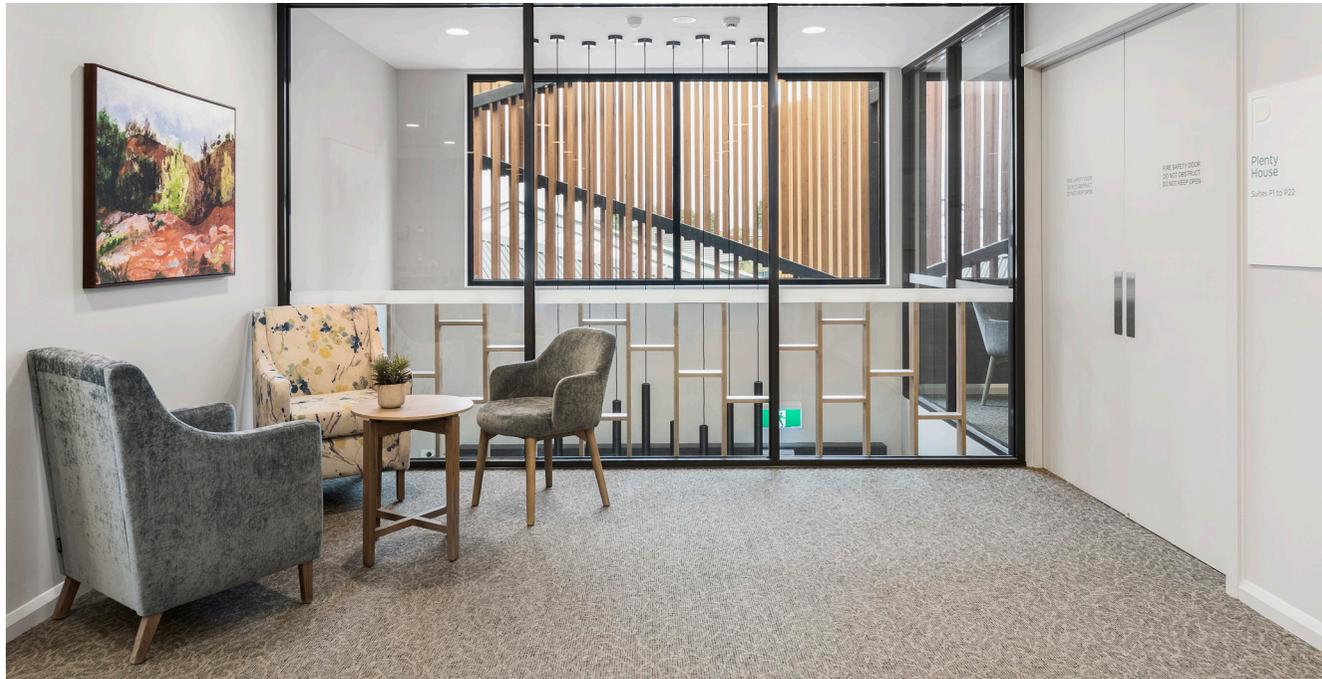
- Engage in conversations about a bribe; or
- Respond positively to a demand for a bribe from anyone in your dealings at ICG, so long as you feel your safety is not under threat.



# SECRET COMMISSIONS

Employees/contractors may not, in the course of their employment, receive or attempt to obtain from any customer, contractor, supplier, government official or any other person with whom they deal any secret commission or profit.

Any such offers must be immediately reported to the Group General Manager. Employees/Contractors must also not offer or give secret commissions, hidden gratuities, or confidential payments to third parties that might influence prospective customers, contractors, suppliers, government officials or any other person with whom they deal.



## MISUSE OF ICG COMPANY MERCHANDISE, MEMORABILIA, REWARDS OR PRIZES

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Employees/contractors may not, in the course of their engagement, attempt to profit from the sale of ICG or associated companies' merchandise, memorabilia, rewards or prizes, obtained as a result of their engagement with ICG.

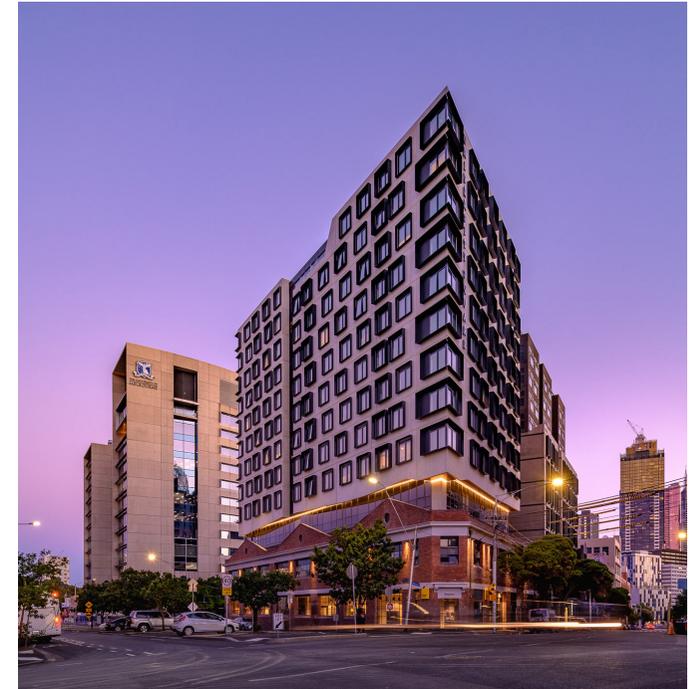
Any merchandise, memorabilia, rewards or prizes gained during your engagement with ICG or received from ICG or associated companies must not be sold or passed to others to sell, during your engagement with ICG.

## FAIR DEALINGS WITH THIRD PARTIES

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Employees/contractors involved in the negotiation of agreements and contracts on behalf of ICG must ensure that all statements, communications and representations are accurate and truthful.

Employees/Contractors must act honestly and fairly in all such business transactions.



## COMPETITION

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Under state and Federal Legislation, companies may not enter into agreements with other companies including their distributors and re-marketers, however informal, which restrict the functioning of the competitive system, such as price fixing or dividing customers or territories.

ICG's intention is to comply fully with all applicable laws, including competition laws. You can help by adhering to ICG's business conduct rules, by being sensitive to legal concerns under competition laws, and by raising any such concerns with the Group General Manager.

## CONFLICT OF INTEREST

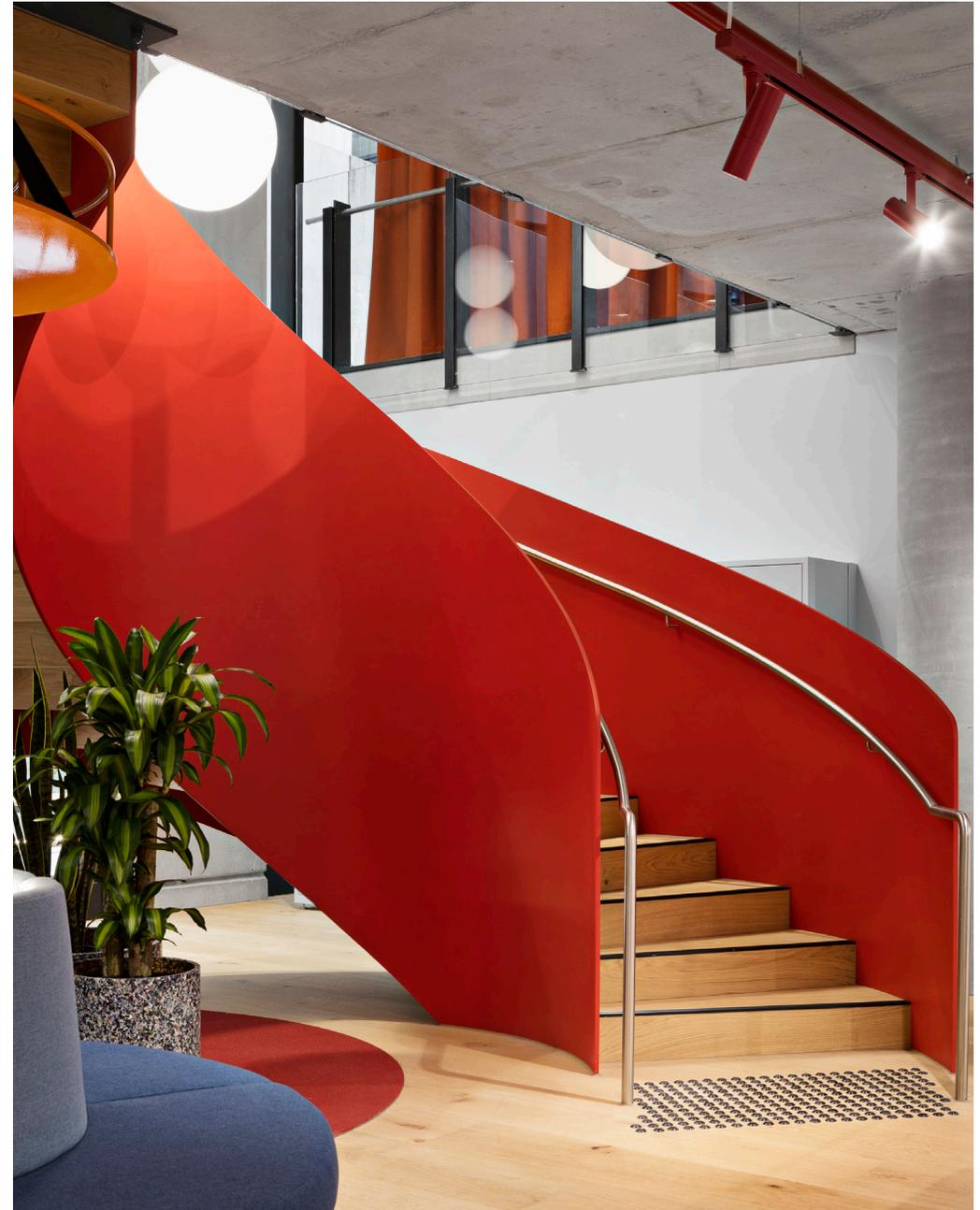
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Conflict of interest refers to any case where an employee's personal interest might contradict the interest of that of the Company. Employees should think about the Company's interest first when contemplating entering into a transaction or arrangement that might benefit their private interest or gain.

You are at risk of having a conflict of interest if your personal relationships, external work activities or interests in another business influences, or could influence, the decision you make on behalf of ICG.

We expect employees to avoid any personal, financial or other interests that might hinder their capability or willingness to perform their job duties.

Refer to the Conflict of Interest Policy for more information.



## PERSONAL RELATIONSHIPS

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While personal relationships are allowed in the workplace, employees engaged in a personal relationship with others in the company or with those whom the company conducts business with, such as suppliers and customers can give rise to a conflict of interest if these relationships are not disclosed.

Personal relationships can include but are not limited to:

- Family relationship – spouse, children, siblings, cousins, parents or other close relatives;
- Emotional relationships – sexual relationships and friendships; and
- Financial relationships – commercial relationships where financial interest is present.

You are required to disclose of any personal relationships to ensure that ICG avoids direct or indirect reporting relationships between relatives or persons of a close relationship. This also helps ensure we avoid any misunderstanding, complaints of favoritism, unfair treatment and claims of sexual harassment in the workplace.

ICG will support anyone who advised management of a personal relationship that maybe an actual or perceived conflict of interest in the workplace.

ICG will not support a romantic or sexual relationship between employees where one individual has influence or control over the other's conditions of employment. These relationships, even if consensual, may ultimately result in conflict of difficulties in the workplace.

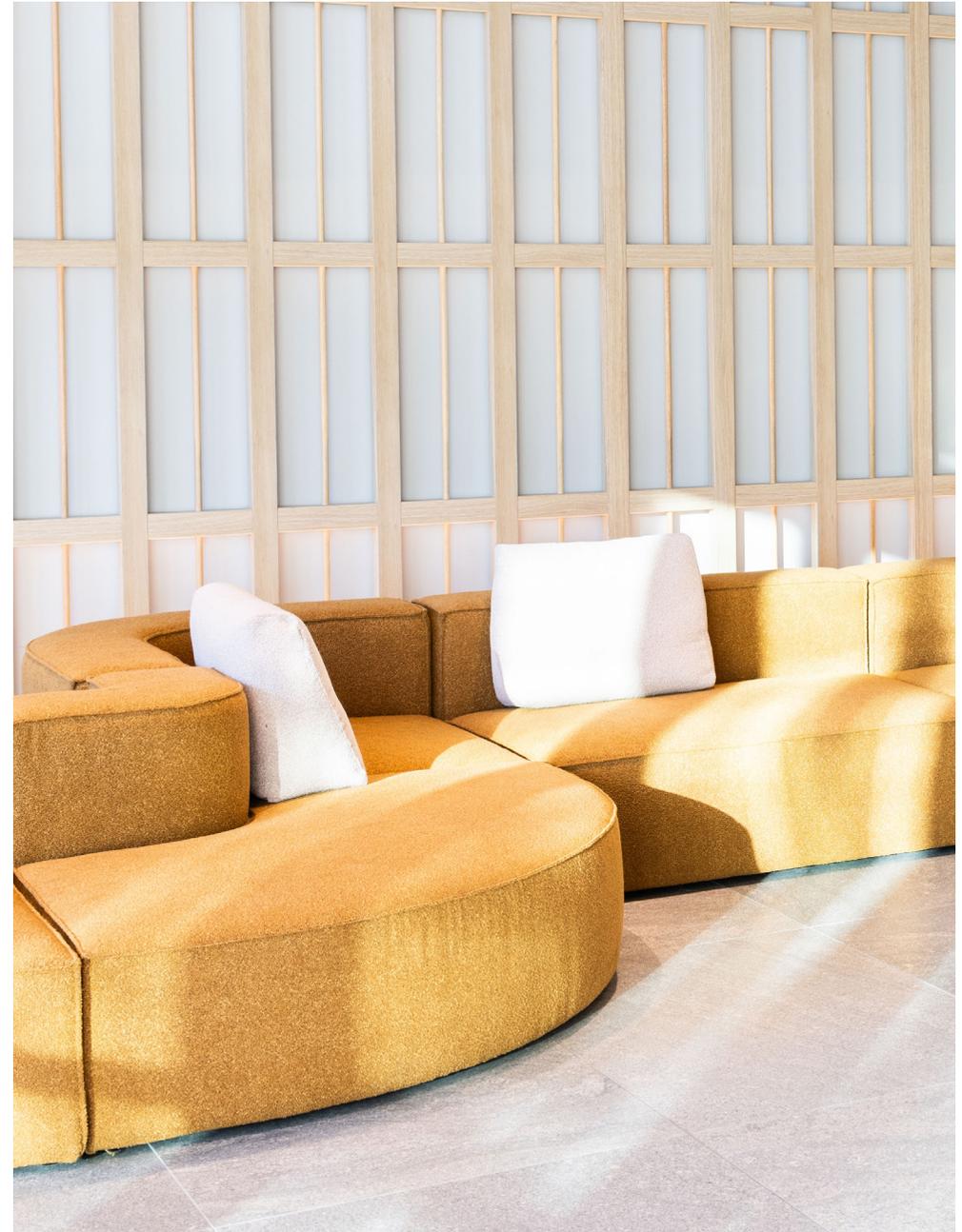
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### ALWAYS:

- Make known to your manager or Talent and Culture Manager of any personal relationships which you may be an actual or perceived conflict of interest;
  - Treat everyone in your workplace equally and without bias or abuse of authority regardless of personal relationships; and
  - Use only work-related facts when making decisions in your role with ICG
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### NEVER:

- Conceal or ask others to conceal your personal relationships from the company; or
- Use your role at ICG to gain an advantage for someone you know in a personal capacity.



## USE OF COMPANY PROPERTY, INFORMATION & RESOURCES



Generally, the use of the property, information, and resources of ICG for any purposes other than the business of ICG is prohibited. Some examples of the application of this general obligation are set out below:

- Approving or making of a payment on behalf of ICG for something other than the stated purpose;
- Intentional alteration of customer or ICG for other than legitimate business purpose;
- Using personal customer information for any purpose other than the purpose of managing a customer's account and any reasons allowed under the customer's contract (e.g.; credit check, marketing);

- Using photocopier machines, stationery or printers for personal reason without authorisation from the employee's manager; and
- Claiming expenses from ICG for travel unrelated to ICG business or for something other than the stated purpose.

Employees/contractors are not authorised to use ICG's name on stationery (letterhead) except in the ordinary course of business and for the legitimate business of ICG.

No property or monies of ICG is to be taken from the premises without written permission of the relevant senior manager.

## INFORMATION & TECHNOLOGY

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ICG employees and contractors will be provided with IT equipment allowing them to perform their duties in their role. The issue of desktops, laptops, iPads, phones or other IT equipment will be issued at the discretion of management.

IT equipment should be used for performing duties associated with your role. Reasonable personal use of company phones and computer systems is generally allowed however, employees and contractor should be aware that ICG uses electronic surveillance systems in order to monitor and audit all systems and equipment.

Employees are given access to company IT systems and equipment to perform their jobs. Trust is placed on employees to respect that property and be aware of what is acceptable personal usage.

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### ALWAYS:

- Consider if your intended personal use of IT systems and equipment can be considered reasonable. If it takes up too much of your time, has the potential to damage the ICG network or is going to incur any additional cost to the company, is illegal or unethical, you should assess what you're doing; and
- Let your manager know if you are aware a colleague is viewing or sharing inappropriate material or is otherwise behaving inappropriately with regards to the use of the company IT system or equipment.

### NEVER:

- Use the company IT system to view or send inappropriate material internally or externally;
- Be afraid to bring to the attention of management any misuse of the IT system or equipment;
- Provide your password to others; or
- Use other employee's IT account.

## SOCIAL MEDIA

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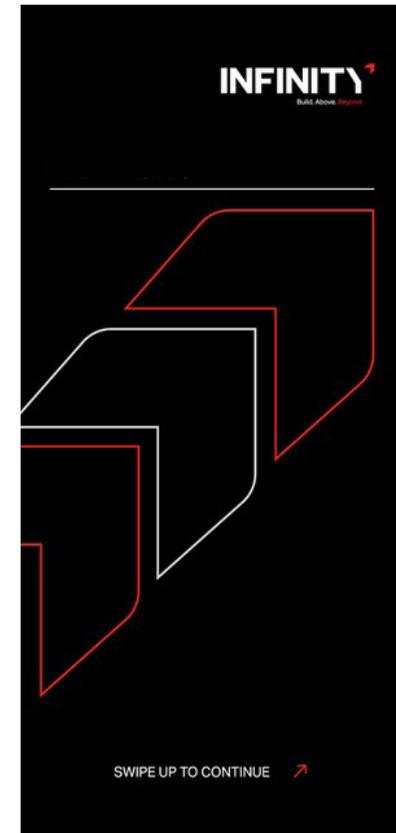
All ICG employees are expected to act ethically, lawfully and with integrity when participating on social media. Individuals are personally responsible and liable for the content they publish on any social media platform.

In the best interest of ICG, employees are not permitted to represent themselves as a representative or spokesperson for ICG on any type of media unless specifically authorised to do so.

Personal use of social media during work hours should be 'reasonable' and should not exceed personal break times or interfere with the employees work responsibilities.

Abusive, threatening, harassing or defamatory postings are viewed as misconduct and can result in disciplinary action including termination of employment.

Refer to the Social Media Policy and Privacy Policy for more information.



## USE OF TELEPHONES

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Employees/contractors may occasionally make personal phone calls provided that such calls are short and do not affect the performance of their job.

## MEDIA COMMENT

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Employees/contractors may not make statements or comments to the media or other external bodies regarding ICG, its business dealings, financial status, customers, suppliers, competitors or shareholders unless directed or authorised by ICG. Such authorisation must come from the Group General Manager or the Managing Director. Employees/Contractors must direct all media

inquiries to the Managing Director or Group General Manager. There can be serious legal consequences for those who release any company information through any media outlet.

Employees should never initiate contact with the media. If you are approached by anyone from the media to make a comment on behalf of ICG, you will need to refer them to the Group General Manager or the Managing Director. This applies to all media outlets including but not limited to trade magazines, local and national radios stations, TV and newspapers.

## BREACH OF THE CODE

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ICG may take disciplinary action against employees who repeatedly or intentionally fail to follow our code of conduct. Disciplinary actions will vary depending on the violation. Possible consequences include demotion, suspension or termination.

ICG may choose to take legal action in cases of corruption, theft, embezzlement or other unlawful behaviour.

If you have any questions regarding the Company Code of Conduct or you require clarity around any information, please speak with the Talent and Culture Manager.





Celebrating Over 30 Years.

**INFINITY**  
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