

Code of Conduct Charter

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Definition and Abbreviations

Bribery	The offering, promising, giving, accepting or soliciting of an advantage as an inducement for an action which is illegal, unethical or a breach of trust.
Closed Period	The period from the end of the financial year or half financial year until the release of the corresponding financial results.
Corruption	Dishonest activity in which a director, executive, manager, employee or contractor of an entity acts contrary to the interests of the entity and abuses his/her position of trust in order to receive some personal gain or advantage for him or herself or for another person or entity.
Decmil	Decmil Group Limited (DGL) and any subsidiary or business which is directly or indirectly wholly, or majority owned, managed, or otherwise controlled by DGL.
Entertainment	Any benefit where the donor is also present, provided to us by an external person or entity, or provided by us to an external person or entity in the form of meals, drinks, accommodation and/or admission to events (e.g. performances, concerts, exhibitions and sporting events).
Executive Leadership Team	Decmil's senior executive management team
Facilitation Payment	A payment or other inducement to a government official to secure or expedite a government action that the government official is ordinarily obliged to perform.
Gift	Any benefit (financial or not) other than Entertainment provided to us by an external person or entity or provided by us to an external person or entity. These include all kinds of services, tangible or intangible property and the procurement of goods at a price below market value. However, Gifts do not include any tangible property of nominal value that is one of a number of identical items that are widely distributed (e.g. pens, desk sets, promotional materials, items marked with a corporate logo etc).
Insider Trading	<p>A person possesses information which is not generally available to the market and, if it were generally available to the market, would be likely to have a material effect on the price or value of Decmil shares; and that person:</p> <ol style="list-style-type: none">I. buys or sells Decmil shares;II. procures someone else to buy or sell Decmil shares; orIII. passes on that information to a third party where that person knows, or ought reasonably to know, that the third party would be likely to buy or sell Decmil shares or procure someone else to buy or sell Decmil shares.

Third Party or Third Parties

means any individual or organisation who is engaged by or paid to represent any entity in Decmil, including licensees, business partners, distributors, business contacts, consultants, contractors, agents, representatives, sponsors and advisors. Third Parties may also include actual and potential customers, all subcontractors, suppliers and consultants, government and public bodies, including their advisors, representatives, government officials and party officials

1. Introduction

1.1 About the Code

The purpose of this document is to further explain our Code of Conduct Policy EM-PO-028. This document (“the/this Code”) is to set a standard of behaviour throughout Decmil which guides how we act when performing our work, how we make decisions and against which we can measure our performance and hold ourselves accountable.

All Decmil employees are expected, at all times, to act consistently with the Code.

The Code comprises principles that apply in various aspects of our working environment, including how we interact with colleagues and how we engage third parties to perform work for us or to represent us. Beneath each principle, the Code provides an explanation and then practical implications for what we must do and what we must not do and provides examples to illustrate how the principles can apply in specific situations.

The Code does not provide an exhaustive list of “Do’s” and “Don’ts”. If we are ever unsure whether any action is right or wrong, it is important to ask ourselves the following questions:

1. Does the action align with Decmil values?
2. If carried out, would the action be interpreted as honest and fair?
3. If carried out, would the action uphold Decmil’s good reputation?
4. Does it feel right?

If we answer “No” to any of the above questions, it is best to seek advice.

As a minimum, Decmil complies with all applicable laws in the jurisdiction in which it is operating. We seek to exceed the legal requirements where it is reasonable to do so and where client expectations require it.

The Code is supported by Decmil’s BMS (Business Management System - a set of controlled documentation such as policies and procedures accessible on the company wide intranet,) and many of the documents are referenced throughout the Code.

The Code has been approved by the Board of Directors of Decmil. It is reviewed regularly and continuously improved. It is a core part of induction and ongoing training.

1.2 Raising a Concern / Reporting

Any person wishing to raise any matter under this Code, whether it is to report any behaviour, to seek approval where required or to seek advice, should first speak to their line manager. If it is not appropriate – for any reason – to engage with your line manager, you may speak to:

1. the General Manager of the Decmil subsidiary in which you are employed; or
2. a member of the Executive Leadership Team; or
3. the Whistle-blower Line (EM-WP-020-002 Whistleblowing Work Procedure)

2. Working together

2.1 Health, Safety and Environment

We know that a safe and healthy working environment for all Decmil employees and the employees of any supplier, subcontractor or consultant working at a Decmil site, is crucial to the continuing success of our business.

Explanation

Decmil is committed to the health and safety of everyone impacted by its operations and to zero harm approach to environmental aspects. No topic is more important to us.

We meet all legal requirements as a minimum and strive for industry best practice at all times.

Decmil's Safety & Health In Every Level @ Decmil (SHIELD) Program is industry recognised as a best practice approach to ensuring a healthy and safe working experience for all.

We ALWAYS:

- Fully commit to the Decmil SHIELD Program
- Strictly comply with all health and safety rules and procedures
- Immediately stop any work that appears to be unsafe
- Identify and report unsafe behaviours, incidences, spills or uncontrolled release of materials
- Properly use the necessary protective equipment provided
- Present ourselves fit for work

We NEVER:

- Prioritise other objectives over health and safety
- Walk past unsafe behaviour or hazards
- Bend the health and safety rules
- Undertake work unless we are fully fit, competent and trained to do so
- Ignore the potential impact of our work on the environment

Examples:

You notice someone taking a shortcut to save time and money. You must ALWAYS follow the safety rules and procedures, because safety and health are ALWAYS the number one priority. You should report the behaviour immediately.

You overhear a colleague asking about Decmil's SHIELD Program and that they are unsure how to comply. Decmil's induction program contains an introduction to the SHIELD Program. Further material is contained on intranet BMS page. You should refer your colleague to this material and suggest that they speak with Decmil's Health & Safety Manager if they need any further guidance.

2.2 Employment Equality

We are committed to providing equal opportunities in all aspects of employment. We will recruit staff based on genuine merit and suitability for the job, without bias or prejudice.

Explanation

Everyone deserves and is entitled to equal treatment at work. This includes the opportunities to be hired and promoted. Our society is diverse, so we respect diversity in the workplace.

We adopt a proactive approach to indigenous training and recruitment.

We ALWAYS

- Recruit and promote on the basis of skill and ability
- Ensure training and development programs are identified and made available to all employees
- Ensure the best possible understanding of cultural considerations that may impact workplace experiences

We NEVER:

- Make decisions based on attributes unrelated to job performance (for example race, colour, disabilities, gender, religion, nationality, age, sexual orientation, age or family responsibilities)
- Tolerate any form of discrimination

Examples:

Promoting or recruiting someone on the basis that they are a close friend or family member. This is a breach of the Code. We ALWAYS promote and recruit on the basis of merit including skills, track record of performance and alignment with the role.

Racial jokes or slurs in the workplace. This is unacceptable and will lead to disciplinary action. We do not tolerate discrimination

2.3 Harassment and Bullying

We are committed to a safe and fair working environment which is free from offensive, humiliating or intimidating behaviour.

Explanation

Decmil has a zero-tolerance approach towards harassment and bullying. These behaviours have a serious impact on an employee's work experience and can also impact a person's life outside of work. Harassment and bullying are illegal and may lead to penalties for Decmil and for anyone engaging in the behaviour.

We ALWAYS

- Treat harassment and bullying as workplace hazards in the same way we treat all other health and safety hazards
- Treat all complaints, promptly, privately and seriously
- Take action against an employee who contravenes this Code including disciplinary action where appropriate
- Encourage employees to speak up for themselves or others

We NEVER:

- Tolerate harassment or bullying in any form or under any circumstances
- Behave in a hostile or unprofessional manner
- Threaten anyone with physical or verbal violence
- Engage in sexual harassment including inappropriate physical contact and suggestions

Examples:

Observing colleagues passing around explicit images.

This is unacceptable behaviour and depending on the circumstances can comprise harassment. You should speak up and request that the behaviour stop and report it.

You observe a line manager aggressively "dress down" a colleague in front of others.

This type of behaviour is contrary to the spirit of the Code. You should report the behaviour. All work or performance issues are to be dealt with in a constructive and professional manner.

2.4 Related Documents

EM-PO-001	Safety and Health Policy
EM-PO-002	Environmental Policy
EM-PO-017	Diversity Policy
EM-PO-025	Anti-Bullying, Harassment, Discrimination Policy
EM-WP-020-002	Whistleblowing Work Procedure
HSE-CH-010-001	SHIELD Charter
HR-PR-050	Workplace Behaviours Procedure Code of Ethics
EM-PO-005	Code of Ethics Policy
HR-PR-010	Recruitment Procedure

3. Ethical Business Practices

3.1 Bribery and Corruption

We conduct our business activities with integrity. We do not participate in Bribery or Corruption, in any form, whether direct or indirect, whether in the private or public sector.

Explanation

Decmil will not engage in corrupt business practices and strictly prohibits Bribery and Corruption by any director, employee, contractor or other party representing Decmil.

We ALWAYS

- Perform our work in lawful and ethical ways
- Take all practical steps to ensure Third Parties conduct themselves to the same standards
- Record Gifts and Entertainment accurately and transparently
- Report any evidence of Bribery or Corruption

We NEVER:

- Make payments greater than the fair value of the goods or services received
- Make or receive Facilitation Payments
- Make unapproved political contributions
- Take action to circumvent Decmil's accounting controls

Examples:

When working on the tender for an overseas project you are asked to engage an “in country” specialist, whose proposed remuneration is a % of the contract sum rather than an hourly rate. This situation should be referred to the Decmil Legal Department for advice. As a minimum, appropriate due diligence must be undertaken, to ensure the specialist is appropriately experienced and qualified and without undisclosed links to the overseas government. Remuneration should reflect the fair value of the work to be undertaken.

You are asked to approve payment to a government official, to ensure that a government process occurs “smoothly”. The payment is likely to constitute a Facilitation Payment and must not be made.

3.2 Gifts and Entertainment

We do not give or receive Gifts or Entertainment which go beyond common courtesies or which could be perceived as compromising a person’s objectivity.

Explanation

Decmil requires that Gifts and Entertainment given and received in the course of business must be for a valid purpose or relationship, of modest value, occasional, comply with the law of the jurisdiction and are not intended to facilitate preferential treatment.

We ALWAYS

- Exercise care when receiving or offering any Gift or Entertainment
- Ensure that any Gift or Entertainment we offer or receive is legal, customary and of reasonable value
- Record all Gifts and Entertainment with a value above AUD\$100 given or received in a register located on the intranet (Gift and Entertainment Register).

We NEVER:

- Offer Gifts or Entertainment to government officials, without prior approval Give or receive
- Gifts or Entertainment in excess of AUD\$100 in value, without prior approval
- Offer or accept Gifts or Entertainment if we think they will impair someone’s objective judgement or improperly influence a decision
- Offer or accept any cash

Examples:

You are asked by a supplier to attend a major sporting event, with all costs being paid by the supplier. You must seek approval from your manager and, if approved, a record must be made on the Gift Registry. You must not accept any hospitality which would compromise your judgement or create a sense of obligation.

A subcontractor says that they are having cashflow issues and asks you to approve the full amount of a progress You should not accept any hospitality in exchange for performing your work functions and you should never assess any claim other than in accordance with the relevant contract and the work actually performed.

claim in exchange for tickets to an event.

3.3 Conflicts of Interest

We ensure that our personal interests do not conflict with the interests of Decmil.

Explanation

A conflict of interest arises when an employee's personal activities or interests have the potential to influence someone's behaviour or actions which is contrary to Decmil's best interest.

It is important to ensure that even an appearance of a conflict of interest is avoided.

Decmil promotes an individual's privacy and pursuit of interests outside of work, however it is important any potential conflict of interests is made known and resolved urgently.

We ALWAYS

- Seek approval before accepting any outside employment or consultancy
- Report any actual or potential conflicts of interest
- Remove ourselves from any decision-making process (in particular contract awards) where our independence may be an issue

We NEVER:

- Use our position or internal Decmil knowledge for personal gain including for our friends and family
- Negotiate fees or prices other than on the basis of fair market value
- Invest in a supplier or subcontractor or competing company, if the investment might influence our decisions

Examples

Engaging a supplier in which you have an economic interest.

This is a conflict of interest. You must seek approval before beginning any dialogue with the potential supplier. It is unlikely to be acceptable. Where it is approved, it must be subject to protocols which ensure that the potential conflict of interest is not allowed to impact Decmil's business interests.

A colleague puts forward a friend or relative for a role with Decmil then lobbies you.

You must assess the candidate on the basis of merit. A recommendation is an important part of, but not a substitute for, a rigorous, transparent recruitment process.

3.4 Insider Trading

We do not use material information which is not generally available to the public for the purposes of share trading.

Explanation



It is illegal to participate in Insider Trading. Where an employee has information about Decmil which is likely to impact the share price but is not generally known, the employee must keep it confidential and not use the information to trade in Decmil shares.

We ALWAYS

- Keep material information confidential including information about the financial performance of Decmil, the award of significant contracts (to Decmil, or by Decmil to a supplier or subcontractor) or any actual or potential major transactions
- Ask Decmil’s Legal Department if we are considering buying or selling Decmil shares and are uncertain about whether it is acceptable.

We NEVER:

- Buy or sell Decmil shares in reliance on price sensitive information that is not generally available to the public.
- Buy or sell Decmil shares during a Closed Period.
- Communicate price sensitive information to third parties.

Examples:

The following are possible examples of price sensitive information which, if made available to the market, may be likely to affect materially the price of Decmil’s shares:

- a. a proposed major acquisition or disposition;
- b. a significant business development or a proposed change in the nature of Decmil’s business; details of major potential litigation; and
- c. the likely award or non-award of a major contract.

<p>You are aware of the imminent award to Decmil of a large contract. You are asked about it by a friend or family</p>	<p>You must not comment. A large contract award is very likely to be material information which must be kept confidential until it has been formally member. announced to the ASX</p>
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3.5 Anti-Competitive Conduct

We promote fair and open competition in the markets in which we operate

Explanation

Decmil is subject to competition laws which prohibit it from engaging in anti-competitive conduct, including:

- a. price fixing;
- b. bid rigging and collusive tendering;
- c. abuse of market power;
- d. misleading or deceptive conduct; and
- e. unconscionable conduct.

The consequences of not complying with these laws can be very serious for both Decmil and the relevant employee and extend to significant fines and potential criminal proceedings. There is also significant potential reputational damage flowing from such actions.

We ALWAYS

- Consider the appearance of our interactions with competitors and suppliers, whether in a business or personal setting
- Provide full and accurate information and maintain open, transparent communications
- Ensure that all subcontractor and supplier awards are made following a competitive bid process
- Contact Decmil's Commercial & Risk Manager if you have any concerns or doubts

We NEVER:

- Agree with competitors on the price of our bids
- Agree with competitors to exclude certain subcontractors or suppliers
- Intimidate or threaten subcontractors, suppliers or competitors

Examples:

You are offered confidential information about a tender from a former colleague now working for a competitor.

You should not accept the offer. This is anticompetitive behaviour and you are participating in a breach of a competitor's confidentiality. You should report the behaviour.

You are asked by a competitor to exclude a subcontractor from the tender for an upcoming project on the undertaking that the competitor will do the same for the next project.

You must say no. While a subcontractor's capacity to perform work is an important factor in the assessment process, agreeing subcontract bid lists with a competitor is likely to constitute collusion.

3.6 Related Documents

EM-PO-023	Anti-Bribery and Corruption Policy
EM-WP-020-001	Anti-Bribery & Anti-Corruption Work Procedure
EM-PO-026	Entertainment and Gift Policy
EM-PO-018	Securities Trading Policy
EM-WP-020-002	Whistleblowing Work Procedure
HR-PR-010	Recruitment Procedure
PD-PR-050	Procurement Procedure
EM-PO-029	Conflict of Interest Policy

4. Use of Assets and Resources

4.1 Use and Protection of Personal Information

We treat all personal information as confidential

Explanation

Decmil is subject to laws which regulate how personal information can be recorded and used. Personal information means documents or information about a person where the identity of the person is apparent or can be worked out from the document or information.

We ALWAYS

- Collect only the data that we need for legitimate business purposes
- Give full and accurate disclosure of why data is being collected
- Promptly report any loss of data or breaches of confidentiality and do our best to contain the loss or breach

We NEVER:

- Collect unnecessary personal data or keep it for longer than required
- Share personal data unless it is in accordance with Decmil's policies and procedures

Examples:

Putting hard copy documents containing personal information into a general waste bin or leaving them in plain view on your desk.

Documents which contain personal or other confidential information must be handled carefully, to protect confidentiality. You should not leave them where they can be read by anyone and when disposing of them, you should shred them or use secure destruct waste bins.

A candidate for a role inadvertently sends you private information about the candidate's family members.

Immediately upon becoming aware that the material is unrelated to work you should stop viewing the material, alert the candidate and advise him or her that you are proceeding to delete the material electronically and/or via secure destruct.

4.2 Financial Controls & Record Keeping

We maintain appropriate financial controls to ensure the integrity of our accounts, keep records and adopt reporting practices which are correct and complete

Explanation

It is imperative that we maintain financial controls and records for many reasons, including audit and compliance, internal forecasting and timely payment and receipt of funds.

All financial controls are designed in keeping with ASX guidelines, best accounting industry practice and to minimise risk of any dishonest behaviour.

We ALWAYS

- Ensure that any financial data we record is correct and supported by primary documentation



- Comply with Decmil's financial controls and report any suspicion of wrong doing Operate within the limits of authority contained in the Financial Authorisation Matrix, the Governance Authority Matrix and the Expenditure Approval Levels.
- Fully co-operate with our accountants and auditors
- Ensure that compliant contract documentation has been finalised and authorised prior to making any commitment and / or to the commencement of any work

We NEVER:

- Knowingly make an incorrect or misleading record for any purpose including any expense claims
- Sell company assets without proper approval
- Never destroy or amend any records that must be kept in order to comply with an investigation or audit
- Give verbal instructions to perform work in the absence of contract documentation

Examples:

Amending a financial record because a client requested You should never do this. All records must correct and complete and comprise a true representation of the financial transaction that has occurred.

You notice an irregularity in a payment to a subcontractor You should immediately speak up and ask. If doubts remain, you should report the irregularity.

4.3 Protection of Assets

We protect the assets of Decmil and ensure that they are used properly and for legitimate business purposes.

Explanation

Decmil's assets are fundamental contributors to and demonstration of our success and all care should be taken to protect them.

We consider our people to be our greatest asset. Other important assets are physical assets like plant and equipment, and also intangible assets such as reputation and business strategy.

It is in everyone's interests that these assets are protected.

We ALWAYS

- Use all available means to prevent loss or damage to Decmil equipment
- Use assets and resources for business purposes
- Seek to ensure that third parties who are using Decmil assets do so lawfully and comply with any relevant Decmil policy
- Challenge and report anything which may compromise the security of Decmil assets
- Maintain all Decmil equipment in accordance with Manufacturer's recommendations and / or best industry practice.

We NEVER:

- Make assets or resources available to people outside of Decmil or for a non-Decmil purpose
- Use Decmil assets or resources for personal gain
- Use Decmil assets to access inappropriate material

Examples:

You observe a colleague using Decmil equipment other than for its approved use.

You should speak up and ask that the behaviour stop. You should also report the behaviour.

Providing Decmil BMS documents from Decmil Intranet to someone outside Decmil.

Decmil's BMS documents are valuable assets and must not be distributed outside the business.

4.4 Use of Technology

We use our IT systems responsibly.

Explanation

Decmil's IT systems are powerful assets. They include laptops, smart phones and tablets. They are to be used for business purposes. Any personal use should be reasonable and appropriate.

We ALWAYS

- Use Decmil's IT systems for employment and other business purposes
- Ensure we protect Decmil's IT systems against loss, damage or theft
- Advise Decmil's IT personnel of any unsolicited emails containing inappropriate content
- Maintain the security of IT Equipment by logging off when not in use, changing passwords regularly, not sharing passwords and not allowing unapproved external people access.

We NEVER:

- Access, create or store any objectionable or offensive material on Decmil's IT systems
- Use Decmil's IT systems for excessive personal communication, or to harass, bully or discriminate against others
- Install software without permission
- Are reckless about the content of emails, on the basis they are informal communications

Examples:

Browsing the internet from a Decmil computer, you visit sites which contain inappropriate content.

Inappropriate material (including any pornographic material) is strictly prohibited by Decmil and this is a serious breach. You must not access inappropriate material and you must report anyone you observe using a Decmil computer for such purposes.

Giving a colleague your computer or other software application login details.

You must never provide a colleague with your computer login details. You will be responsible for their behaviour while they are logged on via your account.

4.5 Related Documents

EM-PO-021	Information Systems Technology Acceptable Use Policy
EM-PO-031	Information Systems and Technology Policy
EM-GL-020-004	Financial Authorisation Matrix
EM-GL-020-003	Governance Authority Matrix

5. Engagement with Third Parties

5.1 Relationship with Third Parties

We act with integrity, transparency, respect and professionalism in all our dealings with Third Parties, to promote mutually beneficial relationships.

Explanation

We interact with many clients, real and potential, and engage subcontractors, suppliers and consultants of varying size, skills and track records of working for Decmil. We strive to maintain high standards of behaviour at all times as these relationships.

We ALWAYS

- Seek to add value to client businesses and always deliver on our commitments
- Seek relationships with Third Parties who share a commitment of the standards set out in this Code.
- Seek to resolve disputes in a non-adversarial, transparent, collaborative and timely manner
- Comply with the laws of the countries in which we operate
- Undertake appropriate due diligence before engaging third parties to perform work for us or represent us
- Communicate honestly and transparently at all times

We NEVER:

- Ignore client requirements or forget that satisfying client requirements is crucial to our success
- Disregard or conceal the results of any due diligence conducted in respect of Third Parties
- Destroy or conceal any documentation requested by a court or official

Examples:

You become aware of potentially significant project delays while preparing a status report for a client.

A colleague or friend recommends a supplier for Decmil work.

You must immediately raise the issue internally and discuss the way forward. You must not conceal information because it is potential “bad news”.

Recommendations from trusted sources are an important part of the procurement process, however they must always be subject to appropriate due diligence.

5.2 Media, Public Disclosures

We communicate honestly, accurately and in a timely manner.

Explanation

Decmil is listed on the ASX and it is crucial that information which Decmil releases is timely and accurate, particularly as it may impact trading in Decmil shares and the value of those shares.

Any breach of Decmil’s continuous disclosure obligations can lead to severe penalties for Decmil and its directors and can also lead to other legal issues and reputational damage.

We ALWAYS

- Obtain the necessary approvals prior to releasing any material to someone outside Decmil



- Refer any enquiries from the media or investors to the CFO
- Exercise caution when discussing Decmil matters in public situations
- Comply with the continuous disclosure obligations of ASX list companies

We NEVER:

- Misrepresent information
- Engage with media or investors without full information and approvals
- Behave recklessly with electronic communications or social media
- Represent personal views as the company views

Examples:

You are contacted by a reporter who asks questions about a recent Decmil project win

You should not answer the questions unless you have been approved to do so, even if you are confident that you know the answers. Refer the reporter to the CFO

You are asked by a client to approve a press release which refers to Decmil

You should refer the release to the CFO for approval, even where the references in the materials are minor or in passing or are positive and therefore presumably acceptable.

5.3 Sponsorship and Donations

We support charities and community groups through ethical sponsorship and donations

Explanation

As a socially responsible organisation, it is important for us to support our community by giving back through charitable activities and initiatives.

We ALWAYS

- Ensure a charity is correctly registered
- Obtain approval from the Group Financial Controller before making any contributions on behalf of the business
- Encourage participation in charitable events and non-profit initiatives

We NEVER:

- Promote initiatives that are not aligned with this Code
- Support organisations with political affiliations or agendas
- Sponsor individuals, other than through organised events.

Examples:

A client or subcontractor requests you make a charitable donation to a nominated charity.

You must seek approval for the donation. Care must be exercised even in situations where charities are involved, to avoid the perception that a donation has the intention of obtaining a business advantage.

A local community group asks that Decmil provide sponsorship.

You should refer the request to the Group Financial Controller. Any such request needs to be considered at the appropriate corporate level, to ensure that is “fits” the business.



5.4 Related Documents

EM-PO-034	Decmil in the Community Policy
BD-TP-010-008	Media Release Approval Form
BD-TP-010-003	Sponsorship Application Form
PD-PR-050	Procurement Procedure
EM-PO-016	Social Media Policy