

MARR

MARR CONTRACTING

CODE OF CONDUCT

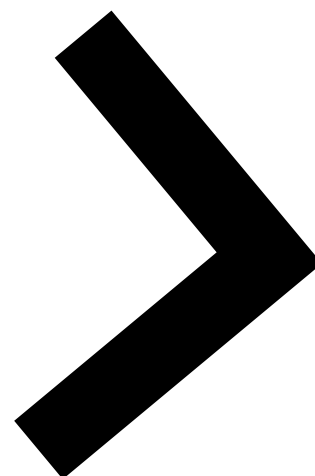


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A MESSAGE FROM

OUR MANAGING DIRECTOR



As a third-generation, family-owned and run business, we have a strong sense of tradition and loyalty engrained in what we do and how we work together – as individuals, as a team, with our clients and suppliers, and within our industry.

With almost 100 years' experience working on complex, high-profile projects, we are proud of the reputation we have built in Australia and globally.

Protecting our reputation and the trust we have earned within our industry is important to us, which is why we have an unwavering commitment to ensuring integrity in everything we do.

This includes providing a safe, supportive, and productive work environment. This can only happen when every one of us cooperates and abides by Marr's Code of Conduct.

Whether on duty at Marr premises, offsite at a customer site, at a Marr or third-party function, or handling information related to Marr, all employees and subcontractors are expected to conduct themselves in a professional manner consistent with:

- Marr's policies and procedures;
- Our commitment to excellence;
- The highest community standards; and
- In strict compliance with applicable laws.

Trust is one of our core values as a business, and part of that is entrusting that you will always do the right thing. As a Marr employee, you are expected to familiarise yourself with this Code of Conduct and the expectations we make of you in relation to work performance and standards of behaviour as outlined in this document.

In instances where the Code of Conduct (including standards, business policies and procedures) are breached, counselling and disciplinary action will occur. Serious misconduct may also result in termination of employment.

Employees who fail to meet these expectations or standards, will be provided with every opportunity to improve. However, this will not be appropriate in cases involving serious misconduct as outlined in this Code.

Employees will be given the opportunity to be treated fairly, equitably, consistently and with dignity during any investigative or dismissal process. Any dismissal action must be handled by the manager involved with the assistance of Human Resources. Refer to our Performance Management, Counselling and Disciplinary procedure for more information.

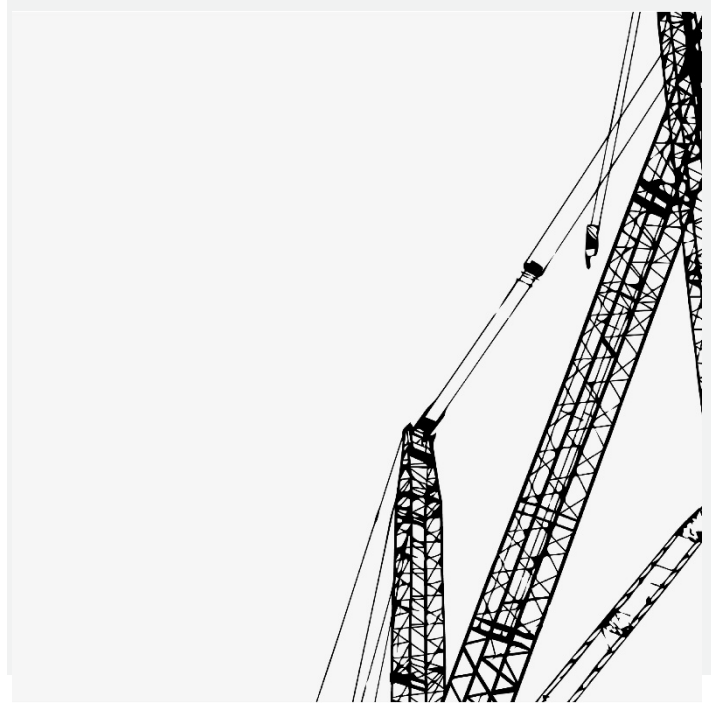
Throughout this Code there are hypothetical situations that may find yourself in. Think about how you would handle these situations as if they were real.

If something doesn't seem right, always speak up because by doing so, you are helping to protect our reputation and the future success of our business.

Simon Marr
Managing Director

ABOUT THIS DOCUMENT

PURPOSE & SCOPE



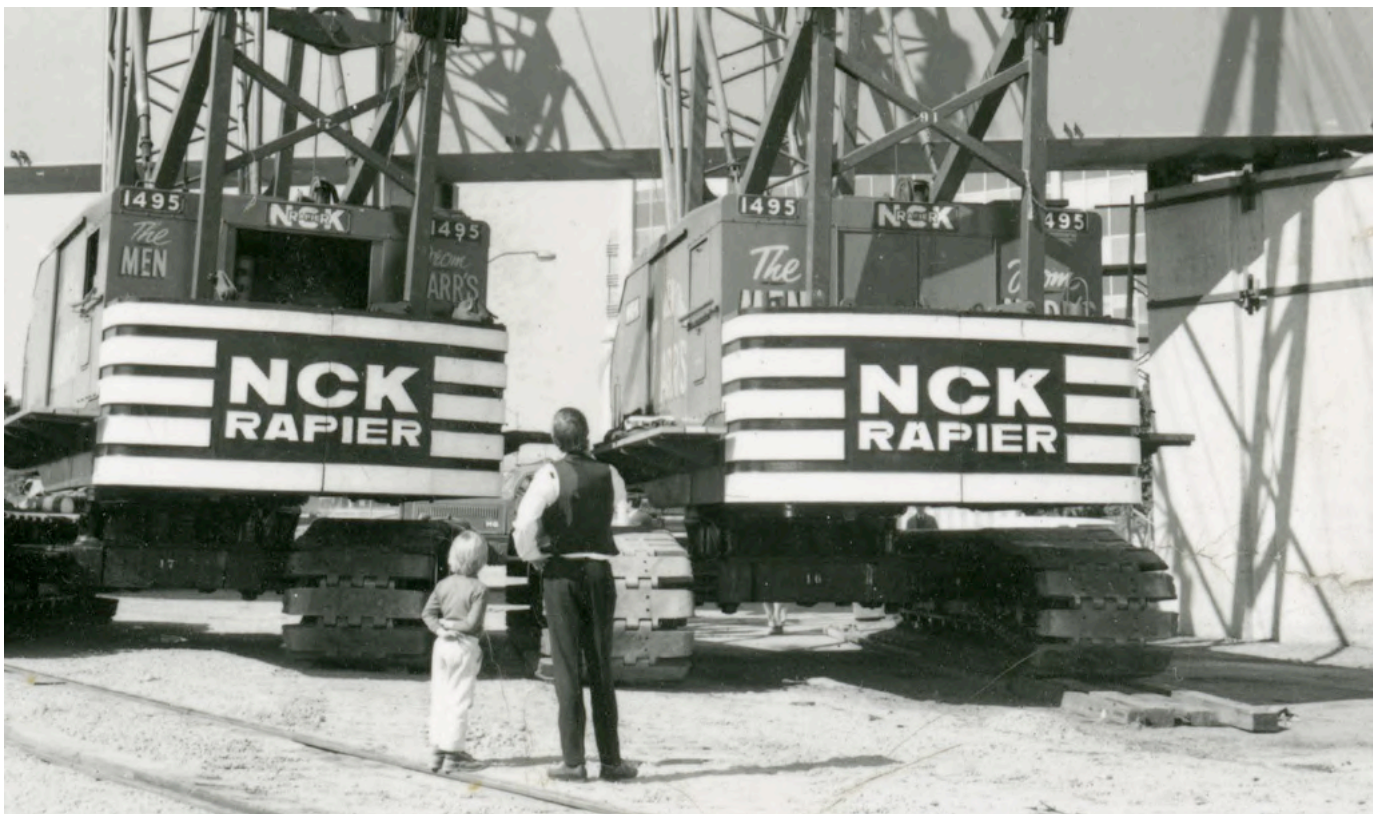
PURPOSE

This code of conduct (code) has been developed to provide an understanding of the standards of behaviour expected of all Marr employees.

The code places an obligation on all employees to take responsibility for our own conduct and report instances of breaches of the code, policies, procedures, or legislation.

SCOPE

This Code applies to all Marr employees at any location across the globe including, contractors, consultants, and other individuals who represent Marr and work, visit or are onsite at one of our facilities or offsite at any business-related activity.



ABOUT US

OUR VISION & VALUES



OUR VISION

To be the recognised leader and partner of choice for heavy lift crane solutions on complex, large-scale construction projects globally.

OUR VALUES

Our values sit at the heart of our business and drive our decision-making and our actions. They determine how we behave, how we work together, what projects we choose to work on, and who we partner with.

By demonstrating our values, we ensure the protection and enhancement of our reputation, profitability and success as a business.

TRUST

As a third-generation family-owned business we have a strong sense of tradition and loyalty engrained in what we do. Our people and clients can always trust they are in safe hands because they know we finish what we start and always put quality and safety first. We are committed to delivering value to the teams, projects, and communities we work with.

SAFETY

We care about people and the environment. We take our responsibility to protect, support and develop our people seriously and recognise our shared responsibility to protect our natural world.

TEAMWORK

We value collaboration and mateship, working together and looking out for each other to push the boundaries of what is possible. We treat the people we work with, both inside and outside the Marr family, with respect, care, and honesty.

INNOVATION

We are problem solvers who love a challenge, always looking for the best, most efficient, and often never done before solution. No job is ever too big or complex for us.

DECISION MAKING



HOW DO WE HANDLE ETHICAL DELIMMAS OR UNFAMILIAR SITUATIONS?

Things can happen quickly and unexpectedly when we're at work. Suddenly you find yourself in a situation where you have a choice or a decision to make. The decision or choice could be difficult or easy depending on the situation.

If you're faced with an ethical dilemma, unfamiliar situation or if something doesn't feel right to you, ask yourself these questions:

- Is the proposed action I am about to take safe?
- Is it legal?
- Is it consistent with our values?
- Does it comply with this Code and business policies?
- Would you be comfortable if your actions were reported by the media?

If the answer to any of the above questions is no, do not do it!

If at any time you are unsure about the best course of action to take in a particular situation, seek advice from your manager or Human Resources before proceeding.



REPORTING & SPEAKING UP



Should any employee receive information or witness a breach of the Code, company policies, procedures or relevant legislation or instrument, this must be raised immediately. Every employee has an obligation to report any violation. Turning a blind eye to a violation puts the company and yourself at risk.

To seek help, report suspected violations and resolve concerns, you can speak up by contacting the following people:

1. Direct supervisor/ manager; or
2. Next level line manager; or
3. HR representative..

All matters raised will be kept strictly confidential and investigated appropriately.

HOW REPORTS ARE HANDLED

We do not tolerate retaliation against anyone who raises a concern, makes a report, or cooperates in an investigation.

Whilst we strongly encourage employees to identify themselves when seeking assistance, we understand that due to the sensitivity of the matter that employees may choose to remain anonymous, especially if it is about your manager. Anonymous reports can be made by following the guidance on the 'How to speak up' section of this page.

FAIR PROCESS AND DISCIPLINARY ACTION - BREACHES OF THE CODE

Where required, all parties involved in an investigation will get a fair chance to explain the circumstances and their side of the story.

Subject to the investigation and determining the facts and concluding that a breach or lack of performance has occurred, will lead to, depending on the seriousness of the situation one or a combination of the following:

- Performance management (Performance Improvement Plan);
- Disciplinary action from verbal warnings, counselling, written warnings, or dismissal;
- Police intervention; or
- Criminal proceedings/ legal action.

HOW TO SPEAK UP

If you have a concern that you want to raise for any legal, ethical, regulatory or compliance issues regarding employees, vendors, clients, customers and other third parties that we deal with you can report these in the following ways:

- Human Resources – email humanresources@marr.com.au, or text/ call +61 488 266 342 or +61 488 266 045
- If you would prefer to remain anonymous, correspondence detailing the violation can be sent in confidence to:

Human Resources
Marr Contracting
2 Chisholm Rd
SEFTON NSW 2162
Australia.

BEHAVIOURAL STANDARDS

Q & A

Q: "My Uncle is a manager at one of our major suppliers and can provide Marr with great deals on welding consumables. If I am responsible for buying for the company, should I declare this relationship to anyone?"

A: "Yes, as there could be a conflict of interest. You should discuss this relationship with your manager. You and your manager should discuss how to handle the transactions going forward so that you are not directly involved in the transactional process."

THE STANDARDS OF PERSONAL BEHAVIOUR EXPECTED OF ALL EMPLOYEES INCLUDE:

- Demonstrating our values;
- Ensuring our actions are in the best interests of the company;
- Ensuring that our behaviour or actions does not cause the company public embarrassment or bring the image of the company into disrepute;
- Acting with honesty and integrity;
- Being accountable for our actions and work performance;
- Providing excellence in all we do;
- Dealing with customers and the community with respect;
- Maintaining an appropriate standard of appearance while performing duties;
- Ensuring that work is carried out conscientiously, efficiently, economically, and effectively;
- Working safely and ensuring the safety and security of our customers and assets;
- Ensuring the confidentiality of sensitive information;
- Abiding by laws and regulations; and
- Treating each other with respect and working as a team.

ACT WITH HONESTY AND INTEGRITY

We demonstrate this by:

- Demanding of ourselves and each other the highest standards of individual and corporate integrity.
- Safeguarding company assets.
- Compliance with all company policies and laws.
- At no time misusing privilege, authority, or status.

BE ACCOUNTABLE FOR OUR ACTIONS AND WORK PERFORMANCE

We demonstrate this by

- Honouring the commitments we make.
- Taking responsibility for all actions and results (not passing blame).
- Working towards and obtaining our objectives.
- Creating an operating discipline of continuous improvement that is an integral part of our culture.

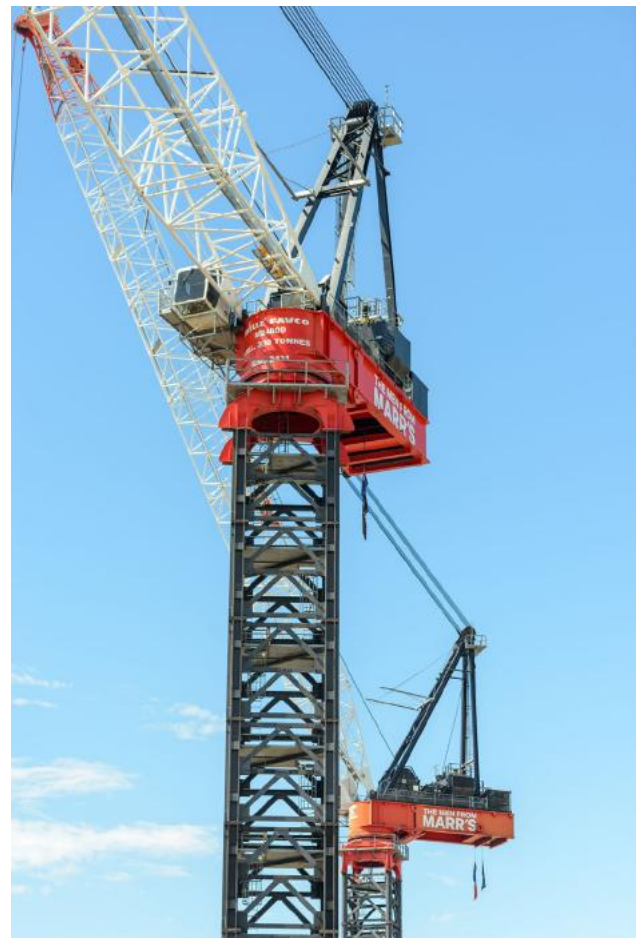


BEHAVIOURAL STANDARDS

PROVIDING EXCELLENCE IN SERVICE

Whether dealing face-to-face with a customer, other employees or third parties, we demonstrate our commitment to providing excellence in service by:

- Continually challenging each other to improve our processes and ourselves;
- Striving always to understand the customers' businesses and help them achieve their goals;
- Being dedicated to diversity, fair treatment, mutual respect, and trust;
- Presenting a positive and professional image of yourself and the company;
- Taking ownership of service failures and taking action to fix the problem;
- Recognising customers in a warm, friendly, and professional manner;
- Cooperating with other units for the benefit of the customer;
- Providing an alternative or explanation when unable to meet customer requests;
- Taking ownership of and following through on customer requests and problems with empathy;
- Ensuring that your job knowledge and skills impress the customer;
- Endeavouring to understand the needs of the customer;
- Presenting yourself and the company in a pleasant manner;
- Responding to customer requests promptly;
- Answering telephone calls promptly and where unable to, returning calls and messages that same day;
- Conveying a sense of urgency in your work and keeping the customer fully updated on your progress;
- Delivering what you promise promptly and unequivocally. By the same token, do not promise something you know we cannot deliver. If circumstances arise that prevent you from keeping a promise, call the customer immediately;
- Remaining calm when a customer makes a complaint. Listen, empathise, and respond with a can-do attitude. Take ownership of the complaint and work to resolve it promptly. Remember that every complaint contains an opportunity to exceed the customer's expectations and transform a negative experience into a positive one;
- Being prepared when going into a meeting and concluding each meeting with a summary of action items;
- Remembering that you are always on view. Adopt a pleasant and constructive attitude;
- Taking ownership for our own learning and self-development. By expanding our knowledge and skills, we enhance our ability to help our customers; and
- Never compromising on work quality. Never pass along errors. Apply tools to identify the root cause of a problem, then work to eliminate it.



BEHAVIOURAL STANDARDS

EXAMPLE: Q & A

Q: “You notice that one of the cranes is leaking diesel all over the deck and onto the bare ground below. What should you do?”

A: “When a safety and/ or environmental threat is discovered, it must be reported to your manager immediately.”

DEAL WITH CUSTOMERS AND THE COMMUNITY WITH RESPECT

We demonstrate this by:

- Behaving in a fair and consistent manner in all dealings with customers and suppliers; and
- Having regard for the protection of the environment and the various communities in which we operate.

ABIDE BY LAWS AND REGULATIONS

We demonstrate this by:

- Complying with the applicable laws in the country you are working in;
- Behaving in a fair and consistent manner in all dealings with customers and suppliers; and
- Having a regard for the protection of the environment and the wellbeing of the various communities in which we operate.

TREAT EACH OTHER WITH RESPECT AND WORK AS A TEAM

We demonstrate this by:

- Fostering an environment that encourages innovation, creativity, and results through teamwork;
- Practicing leadership that teaches, inspires, and promotes full participation and career development;
- Encouraging open and effective communication and interaction;
- Working safely and ensuring the safety and security of fellow employees;
- Treating fellow employees with trust, dignity, respect, fairness, and equity; and
- Placing the wider needs of the company before business unit self-interest.



SERIOUS MISCONDUCT

No employee of Marr should ever find themselves in a position where we need to investigate serious misconduct. However, to safeguard our employees, reputation, and assets we need to be clear about what this involves.

Serious misconduct involves an employee wilfully or deliberately behaving in a way that is inconsistent with continuing their employment and can lead to disciplinary action including termination of employment. Examples include:

- Causing **serious** and **imminent** risk to the health and safety of another person; or
- To the reputation, viability, or profitability of our business;
- Theft;
- Fraud, deceptive and dishonest behaviour;
- Threats, assault, or acts of violence;
- Harassment (including sexual harassment) or bullying;
- Being intoxicated at work (drugs and/ or alcohol);
- Breaches of safety;
- Deliberate damage to company property (or property entrusted in our care) or acts of vandalism; or
- Refusing to carry out a lawful and reasonable instruction that is part of the job.

THEFT

The illegal taking of another persons' or company's property without that persons or company's freely given consent.

Examples include, but are not limited to:

- Theft, attempted theft or concealment of company goods, equipment, or that of other employees or third parties;
- Assisting any person to gain unauthorised access to any portion of the company's premises;
- Selling the companies scrap or waste materials for personal gain;
- Unauthorised use or distribution of company's products, raw materials, or the like for personal or third-party use; and
- Knowingly condoning breaches of the law on any grounds and can be charged as an accomplice to crime.

FRAUD

An intentional deception made for personal gain or advantage or to damage another individual. Examples include, but are not limited to:

- Dishonesty;
- Counterfeiting documents of any nature;
- Embezzlement – taking money which one has been entrusted with on behalf of another;
- Diverting company goods or services for own or third party benefit;
- Forgery;
- Tampering with official documentation;
- Identity theft;
- Creating false or 'ghost' employees for payroll purposes;
- Illegally avoiding tax;
- Falsification of company documents (e.g., employment applications, work production records, call reports, timesheets/cards, travel requests, expense statements and leave of absence);
- Misrepresentation or omission of facts in obtaining employment;
- Falsifying a timesheet; and
- Failure to work full days as per contract.

ASSAULT

Any form of violence; physical or mental towards another person. Examples include, but are not limited to:

- Comments or behaviour that could be perceived by a reasonable person as being threatening or hostile;
- Intimidating or coercing another person;
- Abuse / physical assault – fighting, mental abuse; and
- Disorderly conduct.

UNLAWFUL BEHAVIOUR

Any form of behaviour that breaches a company policy, standard or law. Example include, but are not limited to:

- Immoral or indecent conduct;
- Discrimination; and
- Harassment based upon age, colour, disability, ethnicity, marital or family status, national origin, race, religion, gender, sexual orientation, veteran status, or any other characteristic protected by law.

SERIOUS MISCONDUCT

SUBSTANCE INTOXICATION - POSSESSION - DISTRIBUTION OF BANNED SUBSTANCES:

- Being under the influence of alcohol or banned substances/ unauthorised drugs;
- Reporting to work under the influence of intoxicants or unauthorised/ illegal drugs; and
- Using or distributing alcohol or unauthorised/ illegal drugs within the workplace

SAFETY BREACHES

Committing any acts that could potentially injure a person, lead to, or injures a person through being careless, callous, or neglectful. Examples include, but are not limited to:

- Tamper, interfere or misuse equipment contrary to manufacturers specifications or policies/ procedures;
- Tampering with or removing any form of safety guarding;
- Covering up/ withholding information on incidents or accidents to avoid investigation and rectification of the matter;
- Tampering with evidence in relation to an accident or incident;
- Failing to render assistance to an injured employee;
- Removing a safety tag or lock of another person without appropriate authorisation;
- Weakening any piece of equipment or structure (removing parts) to alter its integrity;
- Operating any form of equipment in a dangerous manner contrary to policies, procedures, or manufacturers specifications;
- Operating or using any equipment or property without being authorised or licensed to do so;
- Smoking in strictly prohibited areas (especially in volatile areas – near gas, chemicals, or other dangerous/ combustible materials); and
- Practical jokes or forms of horseplay especially where people, property, and plant are at risk.

REFUSAL TO CARRY OUT LAWFUL & REASONABLE INSTRUCTIONS

Examples include, but are not limited to:

- Acts of insubordination – refusal to follow directions from proper authority – deliberately disobeying a lawful order;
- Failure to comply with or act contrary to the company's safety rules, instructions, policies, or procedures;
- Acting contrary to a supervisor or managers instructions in any form; and
- Insolence - acting rude or a lack of respect for a manager.

FAILURE TO WORK OR TO WORK COMPETENTLY

Examples include, but are not limited to:

- Refusal to work;
- Sleeping on the job;
- Failure to hold qualifications, certificates or competencies required for your position;
- Breach of professional/ ethical standards;
- Wilful dereliction of duties – avoidance of any duty which may be properly expected; and
- Taking any form of unprotected strike action against the company.

SERIOUS MISCONDUCT



FURTHER EXAMPLES OF SERIOUS INFRACTIONS:

- Repeated and/or frequent minor infractions of policies;
- Breaches of policies related to the contract of employment;
- Destroying any type of company record without authorisation;
- Interfering with, obstructing, or otherwise hindering the work performance of another employee;
- Causing a disturbance by running, yelling, playing practical jokes, horseplay or throwing things;
- Careless handling of company property which creates the risk of and/ or results in damage to such property;
- Excessive lateness or absenteeism (especially unexplained);
- Unauthorised solicitation;
- Misuse of leave benefits/ entitlements;
- Inappropriate use of IT and telecommunications systems;
- Deliberate destruction or misuse of company property or the personal property of other employees or contractors;
- Violation of safety or security rules, established policies, practices or procedures;
- The possession of a dangerous weapon, firearm, or destructive device on company property;
- Gambling;
- Leaving work area without permission, wasting time, loitering, or sleeping during work hours;
- Unauthorised disclosure of company confidential or proprietary information contrary to notice;
- Absence from work without a valid reason;
- Job abandonment;
- Making false accusations, providing untruthful information, or failing to provide full and timely cooperation during any company investigation;
- Taking adverse action against an employee in reprisal for making a declaration about another employee's conduct;
- Selling, using, distributing, or being found in possession of drugs;
- Unauthorised selling, possession, distribution, drinking, or being under the influence of alcohol whilst at work, on duty or in uniform; and
- Corrupt practices, such as offering bribes for the benefit of any party.

GENERAL MISCONDUCT – OTHER UNACCEPTABLE BEHAVIOUR

Q & A

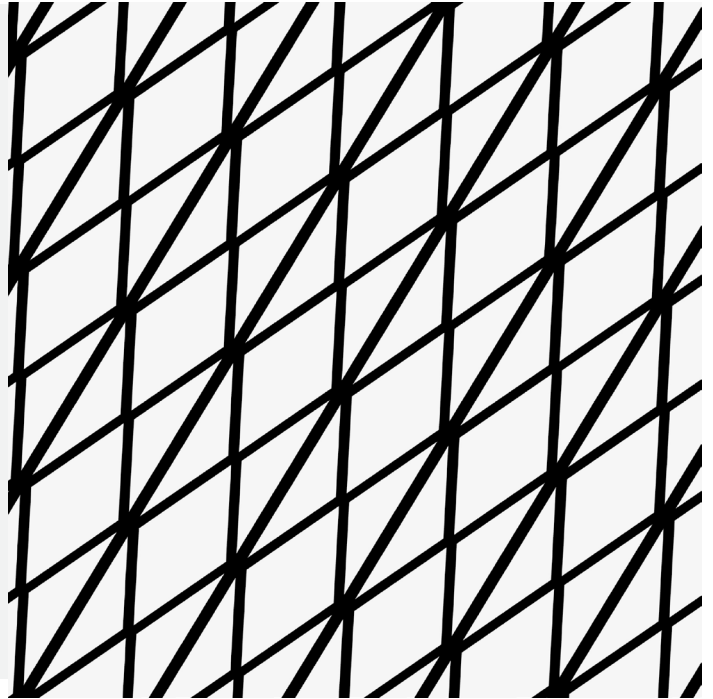
Q: “Bob overhears the crew complaining about the increasing pressure to perform long hours which affects their ability to comply with the company safety policy. Bob feels the same way and wants to report his concerns to his supervisor, but he is concerned that this will be seen negatively. What should Bob do?”

A: “Bob should report his concern to Human Resources. The company has a policy of no retaliation and protects any employee who makes a report in good faith.”

Below are examples of misconduct that warrant disciplinary action but may not be serious enough to lead to immediate termination of employment, subject to the nature of the misconduct:

- Inaccurately reporting information in the application for a position with the company;
- Inappropriate attire;
- Smoking in areas not designated as smoking areas;
- Use of profane language in the presence of others that may take offence;
- Unauthorised circulation of non-company literature;
- Poor attendance/ timekeeping (being late);
- Failure to report an absence to a supervisor;
- Insults, belittling comments, and unfounded criticism towards another;
- Unauthorised use of company time, resources, or facilities (e.g., internet, email, phone, etc) which are inconsistent with primary business operations, is associated with any illegal purpose, or causes interference with, or disruption of other network users, services, equipment, or information assets;
- Accessing, storing, processing, or transmitting any information deemed to be of a threatening, obscene, pornographic, or harassing nature;
- Unauthorised selling or promotion on behalf of another organisation;
- Making unauthorised public statements about the company or its position in respect of any matter;
- Directly or indirectly engaging in any activity which could by association cause the company public embarrassment or other damage;
- Unauthorised passing of sensitive or confidential information (electronic or hard copies) relating to the company or its operations to a third party or posting of such information in a public domain (e.g., external website);
- Seeking or accepting tips or gratuities from customers;
- Not adhering to safety and security procedures and standards; and
- Disruptive or negative behaviour at work (for example, constantly speaking negatively about the company).

SUMMARY DISMISSAL



SUMMARY DISSMISSAL

Where an employee has committed serious misconduct, instant dismissal without notice is permitted.

Each case must be considered on its own merits.

Matters raised under Serious Misconduct of this Code are valid reasons that would warrant summary dismissal, subject to the nature of the case and investigation outcome.

Unless the matter is obviously clear, an employee should be suspended with pay and requested to leave the workplace until an investigation takes place. Refer to the Performance Management, Counselling and Disciplinary procedure.

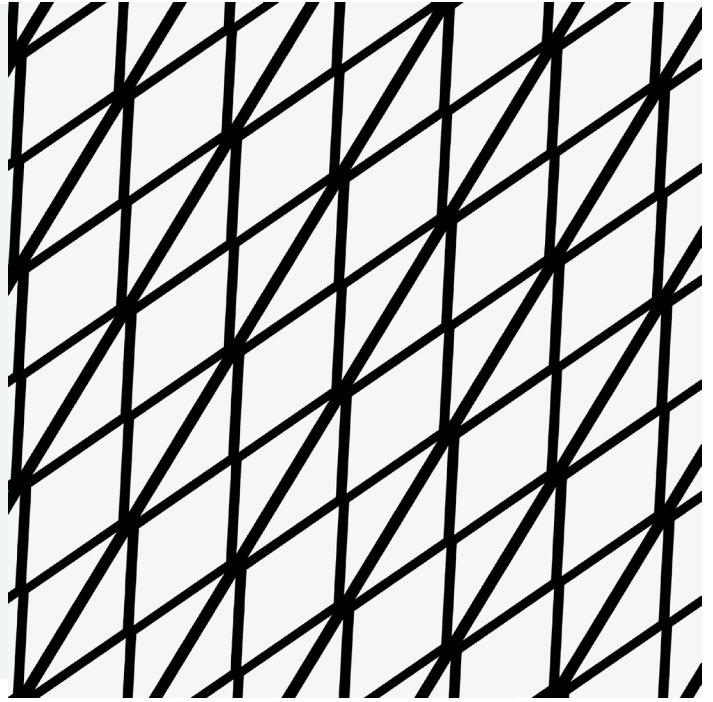
Employees who are summarily dismissed are not eligible for notice payment. Employees will only be paid any statutory entitlements such as accrued annual

EXAMPLE

Q: "One of my team members are taking a lot of time off from work and as a result the quality and quantity of their work output has dropped off considerably. What should I do?"

A: "A manager/ supervisor should raise this with HR as soon as possible. HR will undertake a review of the situation and guide the manager/ supervisor as to the most appropriate steps to take to rectify the situation with the employee and get them back on a path to productivity."

UNDER- PERFORMANCE



UNDERPERFORMANCE

Underperformance is when an employee isn't doing their job properly or is behaving in an unacceptable way at work. This would take the form of not carrying out their work to the required standard or not doing their job at all.

It's compulsory for managers to address any issues as soon as possible. Should a manager find that an employee is not performing for any reason; the employee should be subject to disciplinary/ counselling procedures and depending on the nature of the underperformance matter placed on a Performance Improvement Plan (PIP). Refer to Human Resources in the first instance when seeking to develop a PIP.

Underperformance may manifest as one or any combination of the following as examples:

- Habitually neglectful in undertaking duties;
- Ignoring work duties;
- Wasting time during working hours;
- Purposely going slow to reduce output or interfering with anything that would cause output to slow down;
- Consistently making work related errors;
- Making the same error repeatedly;
- Not retaining specific qualifications, licences or the like that are required for a position;
- Instructing other staff on tasks incorrectly (whether deliberate or not);
- Not completing set tasks on time;
- Not completing tasks accurately; and
- Poor quality of workmanship.

GENERAL MATTERS

Q & A

Q: "I'm not getting enough overtime hours to support my family, so I must consider getting a second job on the weekend to make ends meet. What should I do?"

A: "Speak to your manager and HR about your situation. It's important that we look at all options before you take on a second job so that there is no conflict of interest and that you are not putting yourself into a situation where you are too fatigued to undertake your position with us."

OUTSIDE WORK OFFENCES

Employees charged or convicted of a serious offence must inform their manager or HR immediately.

SECONDARY EMPLOYMENT/ PERSONAL BUSINESS/ VOLUNTEERING

Employees working in a full-time capacity must seek approval from their manager prior to engaging in any secondary employment (including running your own side business). This is not required for one off or random work/ volunteering. Otherwise, approval must be given by either the manager or your HR representative before you commence secondary employment. Approval must be sought each 12 months from the date of approval.

Any conflict of interest that arises during secondary employment must be advised to the manager immediately for review of the continuation of the secondary employment.

PERSONAL REFERENCES

Employees are not permitted to provide written references of any nature on behalf of the company.

A statement of service can be provided by HR upon request by the employee.

If you are asked to be a referee on behalf of an employee, you must only provide information that can be verified. Do not provide any additional information other than what is asked, and refrain from making any false or derogatory comments about the employee.

PERScription MEDICATION

If employees take any form of prescription medication, they must inform their manager immediately should the medication carry a warning related to the side effects the medication may have on their ability to do their work or get to and from work safely (i.e., operate equipment, cause drowsiness, drive a car, etc). An employee is not permitted to drive to or from work or undertake work under the influence of prescription medication and should take appropriate leave until the medication is no longer required. Acting contrary to this may lead to disciplinary procedures including termination of employment.

GENERAL MATTERS

Q & A

Q: "A supplier has visited me to provide me with a box of 6 red and white wines. So, can and should I accept it?"

A: "You should thank the supplier, but politely decline the gift. More appropriate gifts are those that are symbolic in value, have a suppliers logo on it or a of a low value (e.g., box of chocolates). If refusal would cause harm, speak to HR or your manager about it."

DRESS CODE

All employees are expected to dress and be groomed in a neat and tidy appearance suitable for their work environment (office, on-site or off-site) or customer interaction. All clothes must be work-appropriate, be clean and in good condition.

Management reserves the right to determine whether the dress and grooming standards of their staff are of the style required by the company on an as needed basis and will inform their employees accordingly. In some cases, managers may ask an employee to return home to change if their clothing is not appropriate. This time will be unpaid.

All employees are expected to adhere to the local Personal Protective Equipment (PPE) requirements of their local site. Where unsure, refer to your manager or Human Resources representative for more information.

GIFTS

In no way should an employee accept a gift nor offer a gift (themselves or via a third party) where the offering or receiving of the gift is to try and influence a decision in favour of the person or organisation offering the gift, or to try and cultivate favour over time so that the employee may develop a sense of obligation or loyalty to the supplier of the gift.

Gifts under this Code includes but is not limited to tangible or intangibles such as cash, non-cash equivalents, rewards, prizes, entertainment, travel, or any other form of benefit offered or intended to be given.

There are specific laws in jurisdictions where we engage in work that govern rules around corruption and bribery, particularly related to public officials. These must be always observed. Where there is a breach of the Code or specific laws, the company reserves the right to investigate the matter and if an employee is found to be in breach, disciplinary action including termination of employment for serious misconduct may apply.

In any event, where there is any confusion as to the rules around the receiving or acceptance of a gift of any value, an employee should raise this with their manager and/ or HR for further guidance.

FRATERNISATION

Fraternisation is the interaction between co-workers that extends beyond business relationships, which in essence includes romantic relationships.

Individuals in positions of authority, including but not limited to managers and supervisors, are prohibited from dating or romantic involvement with individuals with whom they have direct or indirect authority, within the same chain of command or whose terms and conditions of employment such as pay raises, promotions, and advancement are potentially affected by the engaging employee.

In the event a relationship between employees develops, it must be disclosed, by both persons involved, to their manager and Human Resources. In the event a relationship develops between employees outside of the reporting relationship parameters as described above, it is expected to be harmonious and not interfere with a positive work experience for other employees. At all times, employees are expected to remain professional in the workplace. If necessary, the manager and Human Resources may become involved to resolve any workplace conflicts.

GENERAL MATTERS

Q & A

Q: "At a construction trade show I went to recently; I met one of the senior managers of one of our competitors who said they were planning to implement a 15% price increase on their mid-sized tower cranes in June due to inflation. This is valuable information. Who should I tell so we can take full advantage?"

A: "We do not share, allude to, or exchange price or bid information with competitors. This includes any terms of sale. You should advise your manager and/ or HR immediately of this happening. While it may have been an innocent exchange, it could create the appearance of price-fixing or bid-rigging which is unethical and, in most countries, illegal."

SUPPLIER SELECTION

To ensure fair treatment of suppliers and that they demonstrate their commitment to doing business responsibly we must:

- Select suppliers based on an open competitive bidding process and ensure all offers are compared and considered without favouritism;
- Be transparent about the bidding process and give honest feedback to failed bids based on our criteria for selection if asked;
- Ensure suppliers are acting ethically and in accordance with all laws wherever they operate;
- Protect suppliers' confidential information as if it was our own; and
- Support suppliers in meeting our expectations.

FAIR COMPETITION

Whilst we will compete fiercely in our space, we will do it fairly. We recognise that in most countries, there are laws related to competition and anti-trust therefore we must ensure that we act in accordance with those laws.

Some of the things to be mindful of examples include:

- In any situation where there is a competitor involved, there should not be any information traded related to confidential or competitively sensitive information (such as pricing);
- Undertake any actions that will cut off a competitor's sources of supply;
- Avoid making statements that give misleading impressions; and
- Promptly disclosing to management if we have received or used proprietary or confidential information which relates to competitors or third parties that legitimately belongs to them.

CONFLICTS OF INTEREST

We must be attentive to any potential conflict of interest to maintain our reputation and ensure there is trust.

A conflict of interest occurs when there is a situation in which a person can derive some form of benefit from the actions or decisions they make in their position within the company. It's important that in any potential conflict of interest that employees provide the company with full disclosure of the facts so that it can be appropriately reviewed.

GENERAL MATTERS

Q & A

Q: "We need to set up a new site office in a foreign country and need to have phone lines installed, but we have been asked for a small gratuity to make it happen. Can I pay this?"

A: "No. Unless the payment is for a legitimate installation fee, presented on an invoice, it must not be paid.."

BRIBERY & FACILITATION PAYMENTS

From time to time we may be faced with situations locally or abroad where corruption takes place and bribes, or facilitation payments are required to be paid to transact or to speed up actions (by the government or otherwise).

This could be for things such as permits or releasing assets held in customs. Corruption is illegal in the countries we operate, and we have a zero-tolerance policy when it comes to any form of corruption.

In this respect, we must:

- Ensure those that we deal with in any business capacity are informed of our standards and committed to respecting them;
- Advise our immediate manager (or HR) if we become aware of any situation where there could be a contravention of this policy or an attempt of extortion so that the appropriate actions can be taken;
- Not promise, offer, or give anything of tangible or intangible value to a third party;
- Not accept or solicit money or anything of value that might lead us to a breach of this Code or influencing a business relationship; and
- Use a third party to do something that we are not allowed to do directly.

CONFIDENTIAL INFORMATION

We need to ensure that we safeguard our information (intellectual property – IP) by not releasing this confidential information. This could be internal or external, depending on the nature of the information.

To protect our valuable (and confidential) information, we must:

- Limit disclosure of internal information to people with a legitimate need to know basis that serves Marr's interests;
- Ensure the safe keeping of all confidential information that we hold, both in hard copy and electronically;
- Before sharing internal information with third parties outside the company (including family or social media), check what we have the right to communicate;
- Arrange for third parties such as suppliers, consultants, and the like to complete a non-disclosure agreement;
- Not discuss company information in public where conversations can be overheard, or data compromised; and
- Not keep any internal information upon leaving the company.

GENERAL MATTERS

Q & A

Q: "Sometimes I can't always find all the receipts I need to claim for my business expenses. Is it okay if I add a few fictitious expense items that are less than the amount requiring a receipt, just to make up the difference?"

A: "No, this is not okay. It means the expense reports are not accurate, and that translates to inaccurate accounting records. You need to take responsibility for looking after all receipts and submitting them as proof. It's the only guarantee that you'll receive the reimbursement you are owed."

FINANCIAL & BUSINESS RECORDS

We all have a duty to make sure that all our records, financial or otherwise, are accurate. Accuracy is paramount for a successful business. This is an essential part of running our business legally, honestly, and efficiently. This is crucial to being able to provide transparent, regular, and reliable information to our company owners. Lastly, we must ensure that our activities are not used to launder money from criminal activities.

To that end, we must:

- Play our part in ensuring that accurate financial and business records are always maintained;
- Maintain records securely and follow any guidelines on records retention;
- Ensure we undertake the appropriate due diligence to ensure we are not working with clients that engage in criminal activity;
- Not sell, transfer, or dispose of any company assets without the proper authorisation and documentation;
- Accept cash transactions, unless they are expressly authorised, properly recorded and documented; and
- Conceal payments via the use of third parties.

POLITICAL ACTIVITIES

Marr does not contribute to political parties, politicians, or related institutions. Where relevant, the company will participate in public-decision making processes that impact upon the company. We respect an employee's rights to participate as an individual in any political process, however in doing that they must not represent the company in any way, nor express their views at work or use resources in support of their political activities.

RESPECTING HUMAN RIGHTS

We do not engage in any activity that contravenes Human Rights under the United Nations (UN) or International Labour Organisation (ILO) Conventions which prohibit child labour (slavery of any form), forced labour and respect of freedom of association.

We expect that our business partners do the same.

As a socially responsible employer we advocate for diversity, women's rights, respect for the rights of people to use their natural resources and the right to health.

GENERAL MATTERS

Q & A

Q: "I need to send some personal data to our third-party payroll provider in the UK and want to make sure what I send is secure. What should I do?"

A: "In this instance, it's best to check with your manager and/ or HR to determine the most appropriate way to send personal data per the UK GDPR rules."

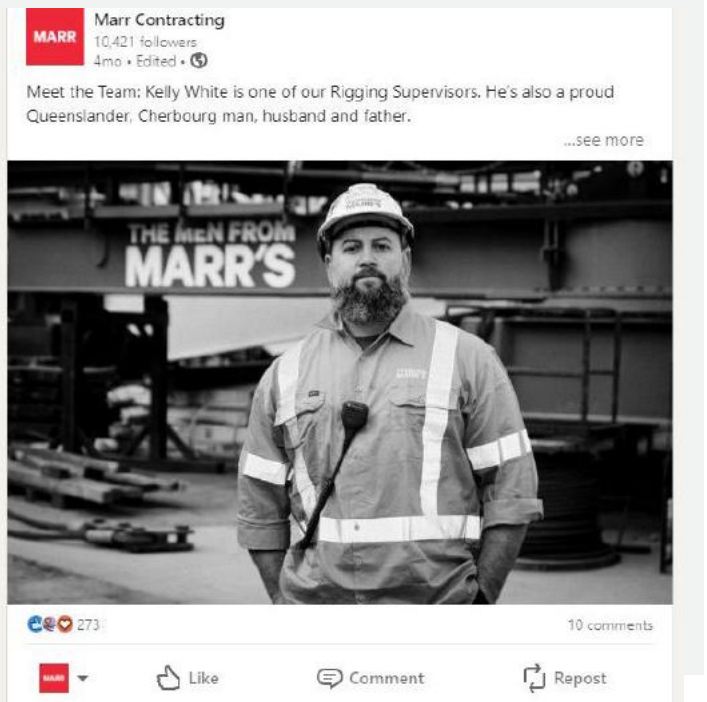
PRIVACY & DATA PROTECTION

Every employee has a right to privacy. There are specific laws that govern the way information is handled within the company in the countries that we operate, therefore we must act in accordance with those laws. We only collect information that is necessary for the effective operation of our company.

Therefore, we must:

- Make sure the persons from whom we collect personal data are informed of the type of information we are collecting, how we plan to use it and how they can contact us if they have any questions;
- Collect only the personal data that is necessary, and where sensitive, with the consent of the person from whom we are collecting the information;
- Ensure the data is securely stored;
- Only share data internally with authorised persons on a strictly need to know basis;
- Seek the appropriate advice internally if we are planning to send personal data outside of the country;
- Not provide personal data to anyone outside of the company unless legally required to do so or if the person involved has provided permission to do so.
- Respect the right to privacy of our employees and colleagues; and
- Not access or store personal data unless we have the appropriate authorisation and a clear business need for that information.

GENERAL MATTERS



MEDIA ENQUIRIES

Only authorised personnel (including our Managing Director, other official company spokespersons and the Head of Communications) are authorised to speak with representatives of the media.

Any media enquiries (including from trade press and general news/ media outlets) must be referred to the Head of Communications.

SOCIAL MEDIA

Employees and sub-contractors are permitted (and encouraged) to like and share posts from Marr's company social media pages on their personal pages and feeds in accordance with the good practices and responsibilities outlined below.

PLEASE NOTE:

Only designated company officers are permitted to post on behalf of Marr and any proposed use of social media tools by employees for business purposes other than the designated company officer(s) requires approval from the Managing Director.

EMPLOYEE RESPONSIBILITIES

Employees must not:

- Disclose any information relating to Marr's, its client or other associated businesses that is not public knowledge, including confidential, proprietary or market-sensitive information;
- Use intellectual property or branding, including Marr's logos and images without explicit approval from the Head of Communications or Managing Director;
- Post or contribute any comments or material with the potential to damage Marr's reputation; and
- Do anything that compromises the privacy of Marr's clients, employees, contractors, representatives, suppliers or partners.

For more information, see our [Social Media Policy](#).

RESPONSIBILITIES



MANAGERS RESPONSIBILITIES:

- Providing employees with a positive role model;
- Providing a duty of care for the safety and welfare of employees;
- Ensuring employees are aware of and comply with policies and the Code of Conduct;
- Raising/ dealing with poor performance/ conduct matters with senior managers/ HR as soon as they become apparent;
- Assisting with investigations on matters with HR in an unbiased and professional way;
- Conducting performance counselling, performance improvement plans (PIP) and disciplinary processes in conjunction with HR;
- Being thorough with documentation in relation to performance;
- Following through on performance plans; and
- Seeking the assistance of HR where appropriate.

EMPLOYEE RESPONSIBILITIES:

- Following the guidelines within this Code;
- Their own behaviour and actions always;
- Adhering to policies regarding all standards of personal behaviour and the Code of Conduct;
- Increasing their performance capabilities by soliciting feedback from management and implementing outcomes;
- Seeking the appropriate advice and authorisation of management regarding the acceptability of an action prior to undertaking it;
- Acting in the best interests of the company;
- Reporting inappropriate behaviours, conduct and performance of others to management as soon as it becomes apparent;

- Actively working with management on improving performance if under a performance improvement plan (PIP); and
- Treating fellow employees and customers fairly and equitably.

HUMAN RESOURCES RESPONSIBILITIES:

- Providing a copy of this Code to all employees and relevant parties;
- Collecting signed acknowledgements of this Code from employees and storing it on their file;
- Updating this Code where appropriate;
- Providing managers with guidance through performance issues and interpretation of this Code; and
- Providing training to employees and managers on matters related to performance.

CONTACT HUMAN
RESOURCES

[HR ASSIST](#)

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MARR