

BUSINESS CODE OF CONDUCT POLICY

Piling Contractors Pty Ltd operates a Business Code of Conduct that is consistent with the values of its parent company Keller Group plc. The Code reflects the importance, direction and culture that the business chooses to conduct its operations. The Code also reflects the sound business principles of honesty, fairness and integrity which underpin all that we do and governs the relationships with both staff and external stakeholders. Our business success will be achieved through adherence to the principles of our Business Code of Conduct.

The following details outline the Code's major components.

Laws, regulations and social culture

- Comply with the laws and regulations where we work.
- Do not behave in an anti-competitive way.
- Do our best to respect local traditions and cultures.

Employees

- We aim to eliminate injuries at work through continuously improving our safety management.
- We believe our staff should be employed and promoted on the basis of their personal merit and contribution and have regard for their personal development.
- We provide training to enable our employees to increase their contribution and personal development.
- We treat our employees with dignity and respect and do not tolerate unlawful harassment, violence (actual or threatened) or discrimination.
- We expect our employees not to use privileged information unfairly for their own advantage.
- We expect the private interests of our employees not to interfere with the best interests of Keller.

Environment

- We do our best to minimise the harmful impact of our work on the environment.
- We do our best to support the communities we work in.

Customers, suppliers, competitors

- We do not offer, authorise, pay or accept bribes or any improper payments to win or retain business.
- We only ever accept gifts or favours if they are of modest value and unlikely to harm objective judgement.
- We offer gifts or entertainment on the same basis and we never give or accept gifts of money.
- We compete fairly and honestly and do not engage in damaging the reputations of competitors.
- We do not expect employees to have personal financial interest in any competitor, customer or supplier, unless that interest is approved in writing by a director or company. (Holdings of less than 5% in a publicly traded company are excluded.)



Our relationships with both staff and stakeholders are critically important and the adherence to the Code of Conduct will strengthen our long term business success and sustainability. We look forward to working with all stakeholders guided by the principles of our Business Code of Conduct.

Signed by:



Carl Voigt
Managing Director

Date: 12th October 2015