

# **Code of Conduct**

LMM Support  
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## Introduction

The policy and procedures stated in this document applies to all staff members of LMM Support, and must be followed at all times

## Ethical Principles and Core Values

LMM Support core beliefs and values include the following:

- Honesty
- Integrity
- Trustworthiness
- Courage
- Respect for others
- Responsibility
- Accountability
- Obedience to the law
- Empathy
- Teamwork
- Commitment to the policies and procedures

## Decision Making and the Code of Conduct

When making a decision, ask yourself the following:

- Is it legal?
- Does it comply with the code?
- Does it reflect our company values and ethics?
- Does it respect the rights of others?
- If you are unsure about any of the answers, ask.

## Reporting/Speaking Up

The company encourages all employees to ask questions and raise issues without fear of retaliation and is committed to treating reports seriously and investigating them thoroughly. Employees must report suspected unethical, illegal, or suspicious behaviour immediately.

The company does not tolerate retaliation against anyone who makes a good faith report of suspected misconduct or otherwise assists with an investigation or audit.

To report a concern, speak to your supervisor or the manager

## No Retaliation

Employees who report a concern in good faith cannot be subjected to any adverse employment action including:

- Unfair dismissal, demotion, or suspension
- Unfair denial of a promotion, transfer, or other employment benefit
- Bullying and harassment, either in person or online
- Exclusionary behaviour
- Any other behaviour that singles out the person unfairly

## Equal Opportunity

LMM Support will not tolerate discrimination based on race, colour, religion, gender, age, national origin, sexual orientation, marital status, disability, or any other protected class.

LMM Support employs and provides services to a cross section of people from diverse social, political, and cultural backgrounds in providing products and services to our clients. We aspire to recognise and benefit from the differences in experience and perspectives that our employees bring to the business.

Just as LMM Support values diversity in managing investment risk, diversity in the workplace adds value to our business decisions through different perspectives and experiences. The term diversity in the workplace recognises that individuals within the workforce differ from each other. As a result, they have a wide range of different needs, skills, and experiences. Differences between employees are both observable (such as race, gender, and age) and not immediately apparent (such as marital status, family/parental status, sexual orientation, political affiliation, religious affiliation, education level, socio-economic status and physical or intellectual impairments).

LMM Support encourages diversity in the workplace because diversity creates:

- effective adjustment to demographic and cultural changes
- effective team membership and increased productivity
- new approaches and ideas
- wider pool for recruitment selection
- multi-dimensional corporate image
- utilisation of employees' overseas experience and qualifications
- increased access to a diverse market; and
- increased business opportunities

We aim to give every job applicant and employee a fair go. We recruit and promote on the basis of merit; that is, the person who is best for the job will get the job.

As an employer, LMM Support recognises the rights of individuals and groups to be free from discrimination and harassment on legislatively applicable Federal and State grounds such as:

Race  
Sex  
Physical / mental ability  
Family responsibilities

Colour  
Age  
Marital status  
Religious beliefs or activities

Pregnancy / possible pregnancy	Political beliefs or activities
National extraction or social origin	Physical features
Industrial activity	Carer status
Lawful sexual activity or sexual orientation	Breastfeeding in Public
Gender identity	Sexual orientation

## Equal Opportunity for Women in the Workplace

Affirmative action means the removal of obstacles in employment so that all employees receive the same opportunities. It is based on the principle of merit, that is, the best person must be employed for the job. Affirmative action aims to take a positive approach, by attempting to prevent discrimination from occurring in the first place as well as removing previous causes of discrimination.

In relation to the Equal Opportunity for Women in the Workplace Act 1999, it is LMM Support's responsibility to ensure that its employment policies and practices do not discriminate against women and that employment decisions are based on the principle of merit.

LMM Support is committed to ensuring that the organisation's employment practices, recruitment, selection and promotion procedures are based on the individual merit of applicants and the inherent requirements of the job.

## Harassment

Harassment is a form of discrimination. It consists of unwelcome, embarrassing, unsolicited, offensive, abusive, belittling, or threatening behaviour directed at an individual or group because of some real or perceived attribute such as a person's ethnicity, sexuality, or disability in circumstances which a reasonable person, would have anticipated that the person harassed would be offended, humiliated, or intimidated.

Harassment can be any one or more of the following:

- practical jokes
- swearing
- a demand or inappropriate request for sexual/romantic favours
- crude jokes, derogatory comments, offensive messages, or phone calls
- graffiti with racial overtones
- name calling, physical threats and offensive gestures
- campaigns of hate and silence
- leering, patting, pinching, touching
- displays of offensive posters, pictures, or graffiti

If such behaviour makes an employee feel offended, humiliated, or intimidated, then harassment and/or discrimination is occurring in the workplace and immediate action is required.

Harassment can occur on the basis of any of the grounds of discrimination.

***Any form of harassment in the workplace will not be tolerated. There will be disciplinary consequences for employees who engage in harassment in the workplace. This may include termination.***

## Copyright and IP

We are committed to ensuring that the organisation abides by all laws and regulations regarding copyright material.

## Workplace Violence

Violence and aggression include verbal and emotional abuse or threats, and physical attack to an individual or to property by another individual or group. The impact of violence on a victim depends on the severity of the violence, his or her own experiences, skills, or personality.

Violent acts include:

- Verbal abuse, in person or over the telephone
- Written abuse
- Harassment
- Threats
- Ganging up, bullying and intimidation
- Physical or sexual assault
- Armed robbery
- Malicious damage to the property of staff, customers, or the business

Workplace violence may not always be a critical or extreme situation from the outset. It sometimes follows a pattern of escalating behaviour – from agitation, expressed anger or frustration and intimidating body language, to verbal/written abuse and threats, physical threats, or assault. Violence can be internal to the organisation or from external sources.

Workplace violence will not be condoned by LMM Support and serious disciplinary consequences, including summary dismissal will apply for offences.

The complaints procedure should be followed in the event of a complaint of workplace violence, however in a severe instance of violence you are required to immediately remove yourself from the situation and report the instance to a company manager. The same potential outcomes described in the procedure will apply.

## Conflicts of Interest

A conflict of interest can occur when an employee's personal activities, investments or associations compromises their judgment or ability to act in the company's best interests. Employees should avoid the types of situations that can give rise to conflicts of interest.

It's important for employees to disclose any relationships, associations or activities that could create actual, potential, or even perceived, conflict of interest to their manager or the Human Resources Department.

## External Communication on Behalf of the Company

Only the manager and client services officer are authorized to represent the company to media and/or legal authorities. Employees should refer all requests for information or interviews to the Communications Department.

## Confidentiality

LMM Support and its employees maintain the confidentiality of all proprietary information. Proprietary information includes all non-public information that might be harmful to the company and its customers and business partners if disclosed.

Confidential information can include:

- Customer lists
- Supplier lists
- Pricing information
- Terms of contracts
- Company policies and procedures
- Financial statements
- Marketing plans and strategies
- Trade secrets
- Any other information that could damage the company or its customers or suppliers if it was disclosed

## Privacy

LMM Support complies with the requirements of Australian and international privacy laws. All employees sign an agreement that contains provisions for information confidentiality and non-disclosure.

The company and its employees do not disclose any private, personal information of:

- Employees
- Customers
- Suppliers
- Competitors
- Third parties

Employees store all personal information securely, mark it as confidential and store it only for as long as it is needed for the purpose for which it was collected.

When providing personal information, employees limit access to only those with a clear business need for the information.

Employees are required to report any breaches of privacy, including the loss, theft of or unauthorized access to personal information, to their manager.

## Competition, Fair Dealings and Antitrust

While LMM Support competes aggressively for new business, relationships with business partners are built upon trust and mutual benefits and compliant with competition/antitrust laws.

Employees are required to:

- Communicate the company's products and services in a manner that is fair and accurate, and that discloses all relevant information
- Familiarize themselves with the company's fair competition policies and remain aware of the consequences of any violation of policies or laws governing fair competition
- Consult the company's legal department before engaging in any new practice that may affect fair competition
- Refrain from price fixing, bid rigging, and any other anti-competitive activities
- Use only publicly available information to understand business, customers, competitors, business partners, technology trends, and regulatory proposals and developments
- Advise their manager immediately of possible violations of fair competition practices

## Bribery and Facilitation Payments

LMM Support will not attempt to influence the judgement or behaviour of a person in a position of trust by paying a bribe or kickback. This applies to persons in government and in private business.

The company does not permit facilitation (or "grease") payments to government officials or private business in order to secure or speed up routine actions.

Employees are to:

- Select third parties carefully and monitor them continuously to ensure they comply with the company's anti-bribery policies
- Keep accurate books and records at all times and monitor that funds are not being used for bribery or facilitation payments
- Refuse any offer or request for an unlawful payment and report the incident to the company's ethics and compliance officer



## Gifts and Entertainment

While gifts and entertainment among business associates can be appropriate ways to strengthen ties and build goodwill, they also have the potential to create the perception that business decisions are influenced by them. LMM Support is committed to winning business only on the merits of its products, services and people and complies with all legal requirements for giving and receiving gifts and entertainment.

Employees are to:

- Use sound judgment and comply with the law, regarding gifts and other benefits
- Never allow gifts, entertainment or other personal benefits to influence decisions or undermine the integrity of business relationships
- Never accept gifts or entertainment that are illegal, immoral or would reflect negatively on the company
- Never accept cash, cash equivalents, stocks, or other securities

Employees may accept occasional unsolicited personal gifts of nominal value such as promotional items and may provide the same to customers and business partners.

When in doubt, employees should check with the ethics and compliance officer before giving or receiving anything of value.

## Record Keeping

All documents, databases, voice messages, mobile device messages, computer documents, files and photos are records.

Employees are required to:

- maintain these records and protect their integrity for as long as required
- maintain official record keeping systems to retain and file records required for business, legal, financial, research or archival purposes
- dispose of your records according to the company's records retention and disposition schedule

Employees should never destroy documents in response to, or in anticipation of, an investigation or audit.

### Protection and Proper Use of Company Assets

LMM Support requires all employees to protect its assets. All assets should be used for legitimate purposes, efficiently, and for company business only.

Assets include facilities, equipment, computers and information systems, telephones, employee time, confidential and proprietary information, corporate opportunities, and company funds.

Suspected incidents of fraud, theft, negligence, and waste should be reported to the VP Operations.

## Health and Safety

LMM Support conducts business in accordance with applicable health and safety requirements and strives for continuous improvement in its health and safety policies and procedures.

All employees are expected to perform their work in compliance with applicable health and safety laws, regulations, policies, and procedures and apply safe work practices at all times in all locations.

Applicable safety and health requirements must be communicated to visitors, customers, or contractors at any company location.

Employees are required to immediately report workplace injuries, illnesses, or unsafe conditions, including “near-misses.”

## Information Technology

LMM Support expects its employees to help it safeguard all computer equipment and data against intentional malicious acts by individuals inside or outside the company. Cyber-security training is provided to all employees to ensure compliance with computer security policies.

The company safeguards against inappropriate access by individuals or groups untrained in correct company policies or procedures

The company does not use software for which it does not have a license.

## Internet Use

LMM Support understands that occasional personal use of the internet during work hours is a reasonable request and allows this, within reason. Employees can ask for clarification from their managers if in doubt.

However, the company does not allow internet use to support a personal business, political venture, or embarrass the company and its customers.

## Use of Social Media

LMM Support respects the right of employees to use social media for personal and professional purposes.

Following policies and procedures provide guideline for employees of LMM Support on how to share information on social media, which include but not limited to blogs, wikis, microblogs, message boards, chat rooms, newsletters, online forums, social networking sites, and other sites and services that permit users to share information with others in a contemporaneous manner.

## Procedures

The following principles apply to professional use of social media on behalf of LMM Support as well as personal use of social media when referencing LMM Support.

1. Employees need to adhere to the LMM Support policies and procedures when they are sharing LMM Support information on social media.
2. Employees should be aware of the impact on LMM Support and its name when sharing company information on social media.
3. The material employee post on social media should not be inappropriate or harmful to LMM Support, its employees, or clients.
4. LMM Support may monitor/observe the content posted by employees.
5. Employees are not allowed to post content on social media including, but not limited to; posting commentary, content and images that are defamatory, pornographic, proprietary, harassing, libellous or that can create a hostile work environment.
6. Employees are not to publish or distribute any confidential information of LMM Support, or its clients.
7. Employees are not to publish or distribute sensitive LMM Support or client information as enshrined in the Privacy Act 1988.
8. Employee should get appropriate permission from the Human Resources Department before posting information or images about current and former employees, associates, vendors, or suppliers.

9. Employees should get appropriate permission from the Human Resources Department on posting or sharing LMM Support copyrighted materials and trademarks.
10. Employees shall not in any circumstances publish or distribute any LMM Support intellectual property, or that of its clients or vendors.
11. Employees conduct on social media outside of business hours that violate LMM Support policies and procedures will result in disciplinary actions.
12. Employees must keep LMM Support related social media accounts separate to their personal social media accounts.
13. LMM Support social media sites must be used for business purposes only, they must not be used to post and share information that reflect employees' personal views or beliefs.
14. If employees find encounter a situation while using social media that threatens to become antagonistic, employees should disengage from the dialogue in a polite manner and seek the advice of a supervisor.
15. Social media use should not interfere with employee's responsibilities, performance, or capabilities at LMM Support. LMM Support computer systems and network, in-house and public, are to be used for business purposes only. When using LMM Support computer systems and network, use of social media for business purposes is allowed (examples: Facebook, Twitter, LMM Support blogs and LinkedIn). However, personal use of social media networks or personal blogging of online content is discouraged and could result in disciplinary action.