Code of Conduct

1 OVERVIEW

MEGT (AUSTRALIA) LTD and its controlled entities and subsidiaries (referred to as MEGT) recognises that we all have an active role in contributing to an inclusive work culture that prioritises physical and psychological safety. Our leadership is committed to providing a safe work environment, through inclusive and respectful management practices and behaviours.

Behaving in accordance with the Code of Conduct is expected of every individual. This will enable us to collaborate effectively, grow as individuals and as a business, help everyone feel included and make MEGT a great place to work.

2 VALUES

This Code of Conduct outlines the standards of behaviour expected in our workplace, reflecting and reinforcing our shared values. These values (United, Savvy, Trailblazers, and Thrive) guide our actions, shape our culture, and define how we work together. They are the foundation of our professional conduct and help create a respectful, inclusive, and high-performing environment. The Code of Conduct is underpinned by our Equality and Inclusive Behaviours Policy, which reinforces our commitment to fairness, respect, and inclusion.

3 SCOPE

This Code of Conduct applies to all MEGT employees, the Board, Contractors, Apprentices and Trainees hosted by MEGT.

This Code of Conduct applies at the workplace and while performing any work for MEGT. The Code applies at all MEGT events outside the workplace, after hours and to all interaction (physical or digital including by social media) with any employee including colleagues and clients.

If you have any questions about how and when this Code applies, you should err on the side of caution and assume it applies unless confirmed otherwise by your Leader or the General Manager People & Capability in writing.

4 CODE OF CONDUCT

WORKING SAFELY	
MEGT is committed to keeping our people physically and psychologically safe	
You must:	**You must not:**
Always conduct yourself in a safe and respectful manner in the workplace. This means ensuring your safety, and that of those around you by: • Act in accordance with your legal obligations at all times, and speaking out about anything you are aware of that may compromise safety • Following the lawful and reasonable directions of MEGT • Making yourself aware of and working in accordance with MEGT 's policies and procedures • Keeping the workplace and our environment free of personal and environmental hazards • Treating others with respect • Only using MEGT resources and equipment in accordance with directions and for a proper purpose	Conduct yourself in a way that creates a safety risk to yourself or to others, including: • Engaging in criminal or illegal behaviour while in the employ or service of MEGT • Disregarding or failing to comply with MEGT 's policies and procedures when carrying out work for, or on behalf of MEGT • Misusing resources or equipment
WORKING WITH OTHERS	
MEGT is committed to nurturing a collaborative workplace culture that emphasises personal wellbeing	
You must:	**You must not:**
Always treat other people in the workplace in a professional, respectful, and courteous manner, including: • Learning about, respecting, and celebrating diversity and inclusion as it relates to self and others • Contribute to a culture of trust, inclusion and learning • Being responsive, courteous, and respectful when communicating and dealing with employees, colleagues, clients, contractors or visitors to MEGT • Treat all persons equitably and fairly, irrespective of any personal attribute, characteristic, or belief, including culture, background, experience, perspective, social contribution, education, race, ethnicity, religion, gender, age, sexuality, values, beliefs, or political views. • Protecting the privacy of others and maintaining appropriate confidentiality over sensitive information by following the Australian Privacy Principles	Treat any other person in the workplace inappropriately, including by: • Engaging in behaviour that could be considered abusive, bullying, intimidating, insulting, offensive, degrading or humiliating • Harassing others or discriminating against them, including when recruiting and/or selecting employees, or in the management of an employee • Making inappropriate jokes or comments targeted at individuals, or particular groups • Engaging in any behaviour that may be considered threatening or that undermines another person's dignity or wellbeing, including microaggressions, digital harassment or coercive control, exclusionary behaviour or the deliberate spreading of rumours or misinformation • Making sexual comments or unwanted physical approaches or contributing to an environment where this is tolerated

Code of Conduct

WORKING WITH INTEGRITY AND DILIGENCE	
MEGT is committed to fostering a work environment in which people can be vulnerable and authentic and have the courage to speak up	
You must:	**You must not:**
• Act in the best interests of MEGT while performing your tasks, including your decision making and actions • Avoid situations which result in a conflict between your personal interests and those of MEGT. Conflicts of interest or potential conflicts should be declared to MEGT as soon as possible as per our Conflict of Interest Policy & Procedure • Be honest, impartial, and conscientious when carrying out your duties and observe procedural fairness (natural justice) in all decision making • Speak out about anything that compromises our safety, legal obligations, customer experience or MEGT 's brand or reputation • Report genuinely suspected corrupt conduct such as fraud, pilfering or stealing to the appropriate Leader or external authority • Inform your Leader of any offer of gift or benefit • Act honestly and in good faith and seek to achieve high standards in everything you do • Use MEGT 's assets (including funds, equipment, and information) responsibly and in the best interests of MEGT • Recognise and report psychosocial hazards, including stress, exclusion or unreasonable behaviour • Report genuinely suspected abusive or harmful conduct towards adults or children to the appropriate Leader • Report any instances of consecutive Gifts, Benefits, or Hospitality offered or given to an employee in a five-year period from the same or related source which exceed $1,000 by completing a Gift and Hospitality Registration Form and seek approval from a member of the Executive	• Accept any gifts or benefits in connection with the performance of your duties with a value in excess of $200 or for the purpose of prize or award giving in line with our Gifts and Hospitality Policy & Procedure • Act in an irresponsible and disruptive manner toward others • Engage in or support any other employees to directly to indirectly engage in any form of victimisation, discrimination, or harassment • Treat any person less favourably because they have raised a complaint or issue • Attend work in any official capacity, or drive a company vehicle, while under the influence of alcohol or drugs • Use MEGT 's funds to provide benefits (such as gifts or entertainment) for yourself or others without approval from the relevant Leader • Use MEGT 's assets other than for MEGT 's purposes or interests

EMPLOYEES WHO WORK WITH NDIS PARTICIPANTS	
MEGT is committed to creating an environment that respects the rights of National Disability Insurance Scheme (NDIS) Participants to safety and self-determination and explaining Participant and NDIS Employment Pathways responsibilities in an accessible way	
You must:	**You must not:**
• Uphold and respect their legal and human rights and enable informed choice and control • Uphold and respect individual rights to freedom of expression, self-determination and decision-making • Provide supports that respect their culture, diversity, values and beliefs • Provide supports that respect and protect their dignity and right to privacy • Support participants to make informed choices, exercise control and maximise their independence relating to the supports provided • Ensure supports are free from violence, abuse, neglect, exploitation or discrimination • Identify and mitigate risks to NDIS Participant's safety and wellbeing as required by NDIS risk assessment and management policy or process • Respond to any concerns or complaints of harm or abuse promptly and follow NEP policy and procedure for receiving and responding to complaints • Report all suspected or disclosed harm or abuse as outlined in NEP NDIS Participant Incidents, Complaints, Investigations and Reporting procedure on internal and external reporting and record keeping • Read and abide by the NDIS Code of Conduct	• Instigate unauthorised restrictive practices or cause harm physically, sexually or emotionally • Make decisions on behalf of a Participant • Violate professional or service boundaries • Take advantage or misuse funds of a Participant • Failure to escalate a complaint or report of harm • Engage in any unlawful activity with or in relation to a Participant • Unlawfully discriminate against any Participant or their family members • Disclose personal or sensitive information about a Participant, without appropriate consent • Work with Participant while under the influence of alcohol or prohibited drugs; nor are you permitted to share these substances

5 RESPONSIBILITIES

Role	Responsibility
General Manager People & Capability	The General Manager People & Capability or their designated People & Capability team member is to develop, review, communicate, issue, and monitor the effectiveness of this policy and to seek opportunities for improvement and amend as necessary.
Leaders	All Leaders are to implement and ensure employees and contractors working under their control understand and comply with this policy.
Employees, Trainees & Contractors	All employees, trainees and contractors must comply with this Code of Conduct. Any employee, trainee or contractor who becomes aware of or suspects any breach of any law or this policy must alert the General Manager People & Capability (see Whistleblower Policy).

6 BREACH OF POLICY

A breach of MEGT's policies may have unintended and harmful consequences and may lead to disciplinary action being taken, including dismissal in serious cases.

Any non-compliance to this policy must be reported immediately to the General Manager People & Capability, or their delegate.

7 COMMUNICATION

This policy is available on the MEGT Intranet site and will be explained to a new employee during induction.

8 REVIEW

This policy will be reviewed every two years. Earlier if requested by management or updated changes to applicable legislation, regulations and/or standards.

9 RELATED POLICY

- Grievance and Complaints Procedure
- Equality and Inclusive Behaviours Policy
- Conflict of Interest Policy & Procedure
- Sexual Harassment Policy
- Gifts and Hospitality Policy
- Disciplinary Policy & Procedure
- Health Safety and Environment Incident Reporting and Investigation Policy
- Social Media Policy
- Child Safety and Wellbeing Policy
- Whistleblower Policy