



## **Policy Handbook & Code of Conduct**

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## 1. Introduction

The Brunel Code of Conduct provides a framework of expectation for Brunel personnel to ensure compliance with all legal and ethical standards in the performance of their duties.

Overall, the Code exists to promote professionalism and excellence so that all personnel are motivated 'to do the right thing' and feel safe and respected whilst at work.

## 2. Responsibility

The Code of Conduct and any Brunel Policy applies to all Brunel personnel. Brunel personnel are considered to be any employee, sub-contractor or any person engaged by Brunel in a contract to perform duties. It is a condition of their contract that all personnel read, becomes familiar with and complies with this Code of Conduct and any Brunel Policy.

The requirements are not intended to be exhaustive and anticipate every situation in which Brunel or their personnel may be compromised morally or ethically.

Consequently, Brunel requires its personnel to use their common sense and sound judgment in compliance with this code.

## 3. Workplace

A Workplace is considered to be any location in which Brunel personnel perform contracted duties such as Brunel or Client sites, facilities, vessels, contractor workplaces, airport terminals, hotels, internal or external training venues (whether during or after ordinary work hours), work related transport including Brunel or Client provided work vehicles, aircraft, helicopters or any other transport provided by Brunel or its Client. This Code of Conduct and all Brunel policy is applicable in the workplace.

### 3.1. At Work

At work is considered to be at any time which Brunel personnel perform a work task resulting in remuneration or payment under a contract with Brunel, performing a task on behalf of Brunel, attending an event representing Brunel or utilising Brunel or Client provided travel or accommodation. This also includes anytime in which you may be paid an allowance or payment.

## 3.2. All Managers, Supervisors and Personnel of Brunel WILL

- Contribute to a harmonious, safe and productive working environment by demonstrating consistent exemplary behaviour
- Treat other personnel, contractors, customers, competitors, and all other persons with whom they deal with at work with the utmost courtesy and respect
- Ensure they do not harass, bully or discriminate against other personnel or any other person
- Act honestly and fairly in all business transactions and dealings with others and within the best interests of Brunel at all times
- Comply with all laws and regulations applicable to Brunel's business
- Comply with the requirements prescribed within documented policies and processes of Brunel's Management System
- Report any breaches of this Code of Conduct or Brunel's Policy to your Supervisor (or Brunel Director, General Manager or Business Manager)

## 3.3. All Managers and Supervisors WILL

In addition to complying with the Code of Conduct personally, you must take all reasonable steps to ensure:

- Personnel, contractors, consultants, agents and partners under your supervision are aware of the Code of Conduct and it is implemented
- Foster an environment which encourages ethical behaviour and compliance with the Code of Conduct
- Seriously consider and respond to any legitimate concerns from an employee in regards to any breach of this Code of Conduct
- Report any breaches of this Code of Conduct to a Brunel Senior Manager (or Brunel Director, General Manager or Business Manager)

## 4. Confidentiality

Confidential company information may include but it not limited to the following:

- Financial information
- Commercial information
- Medical result and records
- Database data or records
- Details of actual or potential risks and problems
- Information concerning the identities and capabilities of employees or other personal details, processes or other intellectual property belonging to Brunel (including its Clients) and
- Any information not generally available concerning the activities, results or plans of Brunel (including its Clients)

- Trade secrets (Intellectual property)

Employees must respect the intellectual property of Brunel and Brunel's clients, including patents, trademarks, copyrights, and trade secrets. Any work, invention, or creation related to business conducted during employment and/or assignment hours, using Brunel or Brunel client company resources, or resulting from company projects, is the sole property of Brunel and Brunel's clients. Employees, consultants and contractors are required to promptly disclose and assign all rights, titles, and interests in such intellectual property to Brunel and Brunel's clients. Confidential information, including trade secrets, proprietary data, or sensitive company information, should not be disclosed or used for personal gain or shared with unauthorised individuals or entities.

Examples of improper handling include unauthorised viewing, copying, distributing, damaging, altering, and removing information from the premises including downloading to an external storage device, personal email, or non-company cloud storage without written authorisation. Non-compliance with intellectual property policies may result in disciplinary action, including termination and legal consequences by Brunel or its clients.

When working with third-party intellectual property, employees, consultants and contractors must comply with applicable licenses, contracts, and usage agreements.

Those with access to confidential information are responsible for ensuring that any confidential data entrusted to Brunel personnel will be treated as confidential and protected against disclosure to third parties.

## 5. Conflict of Interest

Brunel personnel must not engage in activities or hold or trade assets that involve, or could appear to involve, a conflict between their personal interests and the interests of Brunel.

Personnel must not seek to take advantage of their position within Brunel or any of Brunel's information for personal gain or to compete with Brunel.

Personnel are not permitted to hold positions in or have relationships with outside organisations that have business dealings with Brunel if their position in Brunel allows them to influence these transactions.

Personnel must not take employment with outside organisations or operate their own business without the prior approval of the Business Manager.

## 6. Social Media

Brunel recognises Social Media as the various activities integrating technology, social interaction and the construction of words, pictures, videos and audio.

Personnel are expected to take into account that their use of social media for work use, or in a private capacity, has the possibility of putting Brunel (including its Clients) at risk.

When using social media for private purposes, personnel must ensure that any comments relating to Brunel (including its Clients) are not official and that they are speaking only on behalf of themselves. No comment should be made towards anything that could be considered inflammatory or show Brunel, any of its Clients or any other group in a negative way.

## 7. Gifts

The following restrictions are necessary to ensure that the offer or acceptance of a gift does not create an obligation or be construed or used by others to allege favouritism, discrimination, collusion or similarly unacceptable practices by Brunel.

For the purposes of this code, a gift or gifts are any item of value, including goods, services, gift vouchers, hospitality and money.

Personnel are expected to assess the potential for a conflict of interest when offering or accepting gifts or hospitality.

### 7.1. Gifts to Personnel from other External Parties

A gift, benefit or money given to Brunel personnel for the purpose, or suspected purpose of influencing conduct, or encouraging favouritism when making a decision normally made by them in the course of their duties, will not be permitted.

The gift, benefit or money should be surrendered immediately to the Brunel General Manager who will contact the contributor and politely reinforce and explain this restriction.

Personnel may be offered or receive gifts and/or benefits from clients, prospective clients, former clients at various times in the course of their business dealings. In this instance, personnel are required to report receipt of, and surrender, any gift and/or benefit (including money) received from an external party within 3 days of receipt.

The Brunel General Manager or Business Manager will hold and secure the gift, benefit or money and determine if it:

- Can be kept by the recipient (in whole or in part)
- Must be surrendered (in whole or in part) by the recipient to Brunel or returned



Personnel may attend a Client or Brunel sponsored event or invitation and accept any meals or refreshments associated with that event or invitation, provided that the event or invitation is considered to be part of the course of doing business.

## 7.2. Giving of Gifts

Gifts with a value of AU\$300.00 or more must not be given to any external party without the prior written approval of the General Manager or other authorised person.

Personnel must not:

- Offer or give gifts, money, services or other things of value with the expectation of influencing the judgment or decision making process of any client, prospective client, or any other person;
- Financially compensate, in any manner, a person, company, or corporation for recommending or securing a client.

Before a gift is given to an external party, personnel must determine that the intended recipient is permitted to accept the gift under their company's policy.

On occasion, Brunel may entertain clients or business associates. Entertainment expenses for meals and events with potential or actual clients where a business discussion takes place during, immediately before or immediately after the event will be considered valid.

This type of entertainment is dependent upon the existence of a business relationship that would benefit Brunel.

Brunel does not permit or condone the making of payments or payments in kind (gifts, favours, etc.) to influence individuals to award business opportunities to Brunel or to make business Decisions in Brunel's favour.

## 8. Equal Opportunity

### 8.1. Commitment to Diversity

Brunel's reputation is maintained through high business standards and fair and equitable treatment of all personnel. Personnel must conduct business for the company within the intent and spirit of the broadest personal rights legislation in the country in which we operate.

We are committed to working within a culturally rich and diverse environment and have a responsibility to promote diversity. We are committed to providing a work environment that promotes equal opportunity, personal respect and dignity of all personnel and business partners.

## 9. Discrimination, Harassment & Bullying

All personnel have a right to an environment free of physical or psychological forms of harassment, bullying, discrimination or other unacceptable behaviour. This includes behaviour at work, work sponsored events, work related travel or an activity associated with or connected to work.

Personnel must not act in a manner which is or may be considered to be discrimination, harassment (including sexual) or bullying, whether it is intended or unintended.

Intended or unintended behaviour includes:

- Physical, verbal written or indirect; and
- Behaviour that a reasonable person, having regard to all the circumstances, would feel personally threatened, intimidated, offended, uneasy, embarrassed or humiliated.

If discrimination, harassment and/or bullying is experienced or witnessed, it should be reported in the first instance to the appropriate Supervisor (or Brunel Director, General Manager or Business Manager). Any report will be investigated and managed appropriately.

### 9.1. Discrimination

Discrimination or harassment based on race/origin, colour, religion, gender, age, marital status, impairment or disability, pregnancy or potential pregnancy, parental or care giver status or other family responsibilities, sexual preference, political belief or union activity, membership or involvement, physical features or other prohibited grounds, will not be tolerated.

### 9.2. Harassment

Harassment can take many forms and in the workplace and may include (but is not limited to):

- Excluding someone from workplace activities
- Interfering with a person's workplace
- Undermining a person's reputation
- Insulting comments based on physical features or disabilities
- Comments about a person's work or capacity for work
- Bullying
- Spreading rumours
- Comments or jokes about a person's disability, pregnancy, sexuality, age, religion etc.
- Repeated questions about personal life
- Threats, insults or abuse
- Mimicking someone with a disability or about their religious practices
- Repeated unwelcome invitations
- Offensive or obscene language



- Obscene telephone calls, unsolicited letters, faxes, e-mail
- Offensive material on noticeboards, screen savers, email
- Displaying sexist or racist cartoons or literature
- Leering, wolf whistling, crude hand or body gestures
- Following someone home from work
- Demoting, failing to promote or transfer someone because they refuse sexual favours
- Standing very close to someone or unnecessarily leaning over them
- Unwelcome practical jokes and
- Other Unacceptable Behaviour

Harassment in the form of any unwanted action, conduct or behaviour that a reasonable person would find unwelcome, humiliating or offensive will not be tolerated. This applies to any relationship between an employee and employer or contractor and between other employees, colleagues and subordinates.

### **9.3. Sexual Harassment**

Sexual harassment is unwelcome sexual attention and is unlawful when directed against work colleagues, people seeking employment and other workplace participants.

Sexual harassment and may include (but is not limited to):

- Offensive verbal comments or innuendo of a sexual nature
- Sexual jokes, offensive telephone calls, photographs, reading matter or objects, comments about a person's sexual activities, preference or physical appearance
- Sexual propositions or continued requests for dates
- Offensive gestures or suggestive behaviour
- Unnecessary physical contact such as brushing up against a person, touching, pinching, fondling or patting

### **9.4. Bullying**

Workplace bullying is the repeated, unreasonable or inappropriate behaviour directed towards any personnel, any individual or group.

Bullying occurs when an employee, or group of employees, (alone or in front of other employees, visitors or clients) are harmed, intimidated, threatened, victimised, undermined, offended, degraded or humiliated.

Examples of workplace bullying may include (but is not limited to):

- Constant criticisms, teasing or inappropriate comments
- Isolation from others
- Unrealistic, embarrassing or degrading work demands

## 10. Reporting Violations of the Code of Conduct

You must immediately report any suspected or actual breach of the Code of Conduct or Brunel's Policies (including its Clients).

If you have concerns about whether your actions, or the actions of any personnel or colleague, comply with this Code of Conduct or Brunel's Policies, you should raise your concerns with:

- Your immediate supervisor or manager
- The Brunel Director, General Manager or Business Manager

You will not be disciplined for reporting in good faith a possible breach of the Code of Conduct. Any personnel who engages in retribution against you or discloses your identity or information from which you can be identified will be subject to disciplinary action.

## 11. Compliance to the Code of Conduct and Brunel Policies

All Personnel must report any non-compliance to this Code of Conduct or Brunel's Policies (including its Clients). Disciplinary action will be taken against any personnel that is found to have violated the Code of Conduct. The nature of the disciplinary action will depend on the severity of the violation but may include reprimands, formal warnings, demotions or termination of contract.

If personnel contravene any applicable laws or regulations, they may also be prosecuted by the appropriate authorities. Brunel will not pay any penalties imposed on personnel as a result of a breach of any applicable law or regulation where the liability arises because they have failed to act in good faith.

## Do's & Don'ts

Do's	
✓	Read, become familiar with and comply to the Code of Conduct
✓	Use common sense and sound judgement in compliance to the Code of Conduct
✓	Contribute to a harmonious, safe and productive working environment by demonstrating consistent exemplary behaviour
✓	Treat all persons with whom you deal with at work with the utmost courtesy and respect
✓	Act honestly and fairly in all business transactions and dealings with others and within the best interests of Brunel at all times
✓	Comply with the requirements prescribed within documented policies and processes of Brunel (and its Client)
✓	Report any breach or suspected breach of the Code of Conduct or any Policy
✓	If you are a Supervisor / Manager <ul style="list-style-type: none"> <li>▪ Seriously consider and respond to any legitimate concerns from an employee in regards to any breach of the Code of Conduct</li> <li>▪ Foster an environment that encourages ethical behaviour and compliance with the Code of Conduct and attached Policies</li> </ul>

Don'ts	
✓	Accept or give a gift or offer of hospitality unless you have considered the potential for a conflict of interest
✓	Act in a manner which is, or may be considered to be discriminatory, harassment (including Sexual) or bullying, whether intended or not
✓	Engage in activities or hold or trade assets that involve, or could appear to involve, a conflict between your personal interests and the interests of Brunel
✓	Seek to take advantage of your position within Brunel or any of Brunel's information for personal gain or in competition with Brunel
✓	Hold positions in or have relationships with outside organisations that have business dealings with Brunel if your position in Brunel allows you to influence these transactions
✓	Take employment with outside organisations or operate your own business other than in exceptional circumstances and with the prior approval of the Brunel Business Manager.
✓	Report any breach or suspected breach of the Code of Conduct or any Policy
✓	Accept or give a gift or offer of hospitality unless you have considered the potential for a conflict of interest

## 12. Annex A – Brunel Policies

## Health, Safety & Environmental Policy

### Our Purpose

Brunel is committed to providing and maintaining a safe and healthy workplace for all our workers as well as clients, visitors, and members of the public. Included in this definition of a healthy workplace is a determination to strive towards positive mental health outcomes utilising a holistic view of wellness. Our approach to health, safety & environment (HSE) is one of continuous improvement. This means we are actively identifying areas of risk and making the changes to improve outcomes for all staff.

As a recruitment company there are situations where we share responsibility for the safety and wellbeing of our staff. In these situations, we are committed to consulting, reviewing, and coordinating activities with all other persons who have a work health and safety duty in relation to the same matter. In our commitment to safety, Brunel has determined to develop a safety management system in accordance with ISO 45001:2018 certification for the provision of technical provisional resources.

To achieve our purpose Brunel will:

- Measure, monitor, review, and continually improve our HSE Management System and workplace to achieve a high level of compliance with all legal, regulatory, and industry standard HSE requirements.
- Embed HSE risk management principles and protocols into our policies, standards, procedures, planning, decision making, recruitment and training.
- Systematically identify and effectively manage HSE risks to either eliminate or minimise risk to as low as reasonably practicable.
- Provide a safe working environment to reduce the likelihood of injury as far as reasonably practicable.
- Establish, monitor and review HSE objectives and performance targets utilizing measurable criteria.
- Assign clear and hierarchical HSE related responsibilities and accountabilities for all workers.
- Establish and maintain effective communication and consultation mechanisms with workers to facilitate valuable worker contribution, participation, cooperation, and commitment to our HSE management system.
- Provide an active Employee Assistance Program and facilitate and actively engage our staff to ensure their psychological wellbeing is cared for.
- Support workers who reasonably call a stop to unsafe work.
- Provide workers with appropriate HSE related training, instruction, supervision, and assistance to fulfil their designated HSE responsibilities and accountabilities; and
- Maintain compliance with legal and other requirements, including public health directions.

Additionally, Brunel requires our workers to:

- Comply with any reasonable instruction, policy, plan, procedure, program, and/or protocol that is given and/or approved by management.
- Report and stop (if safe to do so) any unreasonably unsafe work or hazards.
- Develop an awareness of, and positively contribute to the health, safety & mental wellbeing of themselves and others, particularly new and/or inexperienced personnel.
- Abide by Government health directions, or subsequent requirements from Brunel to comply with these directions.



Tania Sinibaldi  
Managing Director  
February 2023

## Fitness for Work Policy

### Our Purpose

Brunel is committed to providing people who are physically, emotionally, & psychologically fit to attend and perform their work competently and in a manner that does not compromise their health or safety, or the health and safety of others. This policy is to be implemented in conjunction with Brunel's Drug & Alcohol Policy. We believe that people who arrive to work fit and without injury should be able to return home in the same condition. The purpose of this policy is to achieve this outcome, to minimise harm, and to recognise that this can only be achieved by Brunel and its people committing to the responsibilities as outlined below.

To achieve our purpose Brunel will:

- Maintain & grow a "Zero Harm" culture that supports fitness for work and a safe working environment.
- Conduct pre-employment medical testing, including drug & alcohol screening, in accordance with Australian Standards and Client requirements.
- As far as reasonably practicable work with clients to; identify, assess, and control risks and/or hazards that could affect an employee's fitness for work.
- Comply with regulatory, statutory, legal, and contractual requirements, including public health directions.
- Assess & actively manage risks to fitness for work (including fatigue, environmental factors, and drug and alcohol expectations).
- Provide a comprehensive Employee Assistance Program.
- Adopt a "Zero Tolerance" approach to the use of illicit drugs and/or alcohol in the workplace.
- Provide support to any employee who presents as unfit for work.
- Commit the necessary resources to promote and maximise the effectiveness of this policy.

Additionally, Brunel requires our people to:

- Ensure that any prescribed medication, including medicinal cannabis, does not impair their ability to perform their role safely and does not breach legal requirements.
- Present to work able to pass a zero-presence test for alcohol and non-prescribed / illegal drugs.
- Comply with all reasonable requests to undergo Drug and Alcohol testing.
- Answer all questions in relation to medical screening honestly and to their best possible knowledge.
- Report any person reasonably suspected of being unfit to perform their duties to the nearest Supervisor.
- Take reasonable care to present themselves as fit for work.
- Before commencing or while undertaking work, report any injuries, illness, or undeclared medication to their supervisor or medical staff as soon as reasonably practicable.
- Abide by Government health directions, or subsequent requirements from Brunel to comply with them.

Please be aware that failing to meet Fitness for Work standards in accordance with this Policy may result in disciplinary action and possible termination of contract.



Tania Sinibaldi  
Managing Director  
April 2024

## Injury Management & Rehabilitation Policy

### Our Purpose

We believe that people who arrive to work fit and without injury should be able to return home in the same condition. However, should injury or illnesses occur in the course of employment Brunel is committed to assisting our employee's recovery to either remain at work, or return to work in the shortest possible timeframe so long as it is safe to do so.

To achieve our purpose Brunel will:

- Adhere to all legal requirements regarding the management of injured employees and returning an injured employee back to work.
- Maintain and adhere to a documented Injury Management Procedure.
- Provide an Injury Management Specialist to guide our employee through their recovery.
- When possible after an injury or illness; collaborate with key stakeholders to modify work practices or duties to allow an employee to remain at work or return to work in the shortest possible timeframe.
- Establish, implement, and review Return-to-Work Programs as soon as Brunel receives a Certificate of Capacity indicating that the employee has capacity to return to work, so long as duties are available within the specified restrictions.
- Maintain confidentiality of our employee's medical information.

Additionally, Brunel requires our workers to:

- Report any injury as soon as practicable to their Brunel representative or Client Supervisor.
- Provide their most current Certificate of Capacity to Brunel as soon as possible.
- Take care to abide by the physical restrictions outlined in their Certificate of Capacity at all times to avoid aggravation of their injury.
- Attend medical treatment appointments arranged by the nominated treating doctor, insurer, or where appropriate by Brunel.
- If unable to attend an appointment, take reasonable steps to make an alternative appointment as soon as possible.
- Communicate in a respectful, open, and honest manner with all stakeholders.
- Adhere to exercise or treatment programs as directed by the nominated treating doctor and/or therapists.
- To the best of their ability, perform duties as outlined in the Return-to-Work Program and immediately inform the Injury Management Specialist should they experience any exacerbation of their symptoms.
- Advise Brunel of any change to contact details, nominated treating doctor, or other treatment providers.

The implementation and effectiveness of this Policy will be reviewed in line with the Quality Audit Schedule against the criteria outlined in the Injury Management process.



Tania Sinibaldi  
Managing Director  
February 2023



## Drug & Alcohol Policy

### Our Purpose

At Brunel, we are committed to providing a safe, productive, and healthy work environment for our workers, partners, clients, and the communities where we operate. We recognise that drug and alcohol misuse can impair a person's ability to perform their work safely and effectively, and can pose serious risks to health, safety, and wellbeing.

Therefore, we have developed this policy to provide clarity and outline our expectations and responsibilities regarding drug and alcohol use and testing, and to provide support and assistance to those who may need it. This policy is to be implemented in conjunction with Brunel's **Fitness for Work Policy**, associated manual, and applies to all Brunel workers as well as any visitors to our offices or client's sites. Additionally, Brunel workers will follow the client's policies and procedures when working on a client's site. Where there are differences, the higher standard will apply to Brunel workers.

### 1. Impairment Due to Drugs or Alcohol

All Brunel workers are required to not be under the influence of alcohol or any substance which can impair their ability to perform their role safely or breach relevant legal requirements during work.

### 2. Testing

Brunel requires testing for all site-based workers during their pre-employment screening and will support its client's randomised testing programs. Furthermore, Brunel's non-remote office-based workers may be required to undergo pre-employment testing in line with its client's requirements. Additional testing may be required in response to a workplace incident, or with just cause. Brunel expects all workers to comply with a reasonable direction to undergo drug & alcohol testing either by Brunel or its client. Any person refusing to participate in alcohol or other drug testing, or tampering with a test sample shall be deemed to have a non-negative test and shall be dealt with in accordance with the appropriate disciplinary procedures.

Workers are required to disclose any relevant medication they are currently taking **prior** to undergoing drug and alcohol screening to ensure accurate interpretation of test results.

Testing must be performed and confirmed via a Drug Alcohol Screen conducted by a qualified person and in accordance with Australian Standards **AS/NZS 4308 & AS 4760**.

### 3. Alcohol

Being under the influence of alcohol while working can lead to disciplinary action where there has been a confirmed breach of either Brunel's or our client's Fitness for Work Policies or applicable legislative requirement. All Brunel workers are required to not be under the influence of alcohol or any substance which can impair their ability to perform their role safely at work.

Brunel have a zero tolerance to consumption of alcohol during work hours. Unless a specific exemption for an event occurs with written management approval alcohol consumption is not permitted. In all circumstances our code of conduct applies.

## 4. Prescription Medications

**Medicinal Cannabis:** Brunel will endeavour to accommodate the legitimate use of medicinal cannabis in accordance with applicable laws and regulations. Reasonable accommodation will be made, where possible, to support workers' use of medicinal cannabis where its use does not compromise workplace safety or performance standards.

It is illegal to drive a vehicle or operate machinery in Australia with measurable concentrations of THC (tetrahydrocannabinol). In accordance with this law, workers assigned to roles where driving or the operation of machinery is a required function of their role must not consume any form of cannabis with active THC. CBD (cannabidiol) products with <2% THC may be considered on a case-by-case basis.

**Prescription Only & Controlled Drugs:** For all prescription only &/or controlled medications, a worker must provide a valid prescription or equivalent evidence to ensure its appropriate use. Brunel will need to assess the use of these medications including potential impacts to fitness for work against the proposed role. The underlying medical condition, potential likelihood of exacerbating an injury, ability to safely perform the assigned role, or potential risk to the safety and health of others should also be considered when determining fitness for work and suitability for engagement.

## 5. Non-prescription Medications

As the case with prescription only medications, non-prescription or "over the counter" medications should also be reviewed to ensure that there is no undue risk to the health and safety of the worker, or those around them. These medications must also not impair their ability to safely perform their role.

## 6. Illicit Drugs

An illicit drug is defined as a drug which is illegal to possess, or a legal drug used for a non-medical purpose or obtained by illegal means – that is without a valid prescription.

Brunel has a "zero tolerance" approach to illicit drugs in the workplace. Should there be a confirmed instance of the use or trafficking of an illicit substance, this would constitute serious misconduct and will result in termination and severance of services.

Brunel acknowledges that some forms of addiction may be linked to a medical condition. As such, workers with a confirmed non-negative result shall be offered access to counselling via Brunel's EAP (Employee Assistance Program) to assist them in managing their condition. Additionally, should a worker have been identified as suffering from an addiction, the worker may be considered for re-engagement after a period of six months if they can demonstrate that appropriate rehabilitation and treatment has been obtained and their condition has resolved. On redeployment, they may also be subject to an increased frequency of drug and alcohol testing to ensure continued fitness for work.



Tania Sinibaldi  
Managing Director  
April 2024

## **Respect @ Work Policy (Anti-Harassment, Discrimination and Bullying)**

### **Our Purpose**

Brunel is driven by core values of PASSION FOR PEOPLE and our high standards of equity and INTEGRITY and are committed to strengthening our culture everyday through consistent behaviour in line with these values and Respect @ Work. We strive towards providing a safe and respectable working environment, free from discrimination, harassment including sexual harassment, bullying and any other unlawful behaviour. These behaviours are unethical and unlawful and beneath the standard Brunel expects from all workers, as well as customers, suppliers, and visitors. Brunel acknowledges that these behaviours can take a psychological, emotional, and physical toll and has detrimental consequences on the careers and personal lives of those affected, as well as their families and those close to them. By effectively implementing our Anti-Harassment, Discrimination and Bullying Policy we aim to create a positive workplace environment for all our workers.

All workers, customers, suppliers, visitors, and members of the public are required to be treated and to treat others with dignity, courtesy, and respect. In providing workforce solutions we share responsibility for the safety and wellbeing of our people and in partnership with our customers we are committed to consulting, reviewing, and coordinating activities with all other persons who have a duty in relation to the same matter.

To achieve our purpose Brunel will:

- Embed risk management principles and protocols into our standards, procedures, planning, decision making, recruitment and training to identify the risk and manage harassment, discrimination, bullying and victimisation in the workplace.
- Eliminate as far as possible bullying and unreasonable behaviour including victimising, humiliating, intimidating, or threatening.
- Eliminate as far as possible harassment based on the grounds of race, colour, gender, age, sexual orientation, disability, or other attributes protected by any state or federal anti-discrimination legislation.
- Take a zero-tolerance approach to sexual harassment by being proactive in eradicating the behaviour in all its forms, ensuring action and consequences are appropriate and proportionate considering the offender's behaviour and impact while considering the wishes of the person subjected to the harassment.
- Eliminate as far as possible harassment on the grounds of gender, being unwelcome conduct based on the gender of the person but not necessarily sexual in nature.
- Eliminate as far as possible discrimination on the grounds of gender being differential treatment based on the gender of the person or conduct that subjects a person to a hostile workplace environment on the grounds of gender.
- Eliminate as far as possible discrimination based on the grounds of race, colour, gender, age, sexual orientation, disability, or other attributes protected by any state or federal anti-discrimination legislation.
- Ensure all Brunel people receive induction training with regards to all forms of harassment, discrimination, and bullying and receive regular education to maintain awareness including Brunel's organisational stance and response to allegations.
- Ensure equal employment opportunities are provided in recruitment, training, promotion, appointment, or any other employment related issue without regard to any factor not related to their competency and ability to perform their duties.
- Develop an effective grievance handling framework addressing reports of harassment including sexual harassment, bullying, discrimination, and victimisation and treat complaints confidentially,

seriously, fairly, ensuring they are impartially investigated in a timely manner. (See our Grievance Handling Policy).

- Promote an organisational culture that does not tolerate these behaviours and where our people are encouraged to report harassment including sexual harassment, bullying, discrimination and victimisation that they are subject to or witness.
- Implement our code of conduct and policy handbook to specify expected behaviours in the workplace including the information in this policy.
- Provide an active Employee Assistance Program to ensure our people's psychological wellbeing is cared for.

## What is Harassment?

Harassment is unwelcome behaviour that intimidates, offends, or humiliates an individual, or group of people. Unlawful harassment occurs when someone is subjected to prohibited behaviour under anti-discrimination legislation based on race, colour, gender, age, sexual orientation, disability, or other attribute protected by any state or federal anti-discrimination legislation.

Sexual harassment is unlawful under the Sex Discrimination Act 1984 (Cth) and is characterised by behaviour that is unwanted, sexual in nature and reasonably anticipated to offend, humiliate, demean, or intimidate.

Examples of sexual harassment include, but are not limited to:

- staring or leering
- unnecessary familiarity, such as deliberately brushing up against you or unwelcome touching.
- suggestive comments or jokes
- insults or taunts of a sexual nature
- intrusive questions or statements about your private life
- displaying posters, magazines, or screen savers of a sexual nature
- sending sexually explicit emails, SMS, phone messages or social media
- inappropriate advances on social networking sites
- accessing sexually explicit internet sites
- requests for sex or repeated unwanted requests to go out on dates.
- behaviour that may also be considered to be an offence under criminal law, such as physical assault, indecent exposure, sexual assault, stalking or obscene communications.

Behaviour that is based on mutual attraction, friendship and respect is not sexual harassment. Sexual, romantic, or intimate interaction that is entered into freely and reciprocated between consenting workers is not a form of sexual harassment. However, if people behave in sexually inappropriate ways at work, it could still create a sexualised atmosphere that is unwanted by others in the workplace.

Some personal relationships need to be disclosed to Brunel if they give rise to perceived, potential and/or actual conflicts of interest, for example, where one person has significant influence over the other's opportunities, remuneration and progress; where there is significant power imbalance between parties (i.e. seniority differences); where the relationship is potentially disruptive to team dynamics or has potential reputational implications for the organisation.

Harassment, including sexual harassment, is to the nature and consequence of the behaviour, not the intent of the initiator, and occurs in circumstances where a reasonable person would have expected the behaviour to be offensive, humiliating, demeaning, or intimidating.

## What is Bullying?

Bullying is repeated and unreasonable behaviour directed towards a person or a group of persons that creates a risk to health and safety. Unreasonable behaviour includes behaviour that is victimising, humiliating, intimidating, or threatening. Whether a behaviour is unreasonable can depend on whether a reasonable person might see the behaviour as unreasonable in the circumstances.

Examples of unreasonable behaviour includes (but are not limited to):

- Offensive language or comments
- Unjustified criticism
- Aggressive and intimidating conduct
- Deliberately excluding someone from workplace activities
- Withholding information that is needed for work.
- A person treating one or more people in the workplace less favourably, either directly or indirectly, may be considered unreasonable and inappropriate.
- Setting unreasonable timelines or constantly changing deadlines
- Setting tasks that are unreasonable below or beyond a person's skill level.
- Denying access to information, supervision, consultation, or resources to the detriment of the employee

Unreasonable behaviour amounts to Bullying if it meets the following criteria:

- It is repeated.
- It is unwelcome and unsolicited.
- Based on available information, the behaviour is considered offensive, intimidating, degrading, humiliating, or threatening to the individual it is directed at, or others who are witness to or affected by the behaviour.

## What is Discrimination?

Discrimination is treating or proposing to treat someone unfavourably because of a personal characteristic protected by law on the basis of their:

- Race, including colour, national or ethnic origin or immigrant status.
- Sex, pregnancy or marital status and breastfeeding
- Age
- Disability, or
- Sexual orientation, gender identity and intersex status

Harassment including sexual harassment, discrimination and bullying can happen during work hours, between people sharing the same workplace, at work-related activities such as training courses, conferences, trips, work-related social activities or between colleagues outside of work. This conduct creates a workplace environment that is hostile under these grounds and is unacceptable to Brunel and unlawful under legislation including:

- Sex Discrimination Act 1984 (Cth);
- Racial Discrimination Act 1975 (Cth);
- Disability Discrimination Act 1992 (Cth);
- Age Discrimination Act 2004 (Cth);
- Australian Human Rights Commission Act 1986 (Cth).
- Fair Work Act 2009 (Cth)
- Workplace Gender Equality Act 2012 (Cth)
- Work Health and Safety Act 2011 (Cth)

## What is Victimisation?

Victimisation involves threatening or subjecting a person to detriment because they took certain action such as:

- Making or proposing to make a complaint.
- Taking or proposing to take action relating to the making of a complaint or bringing proceedings including giving information, producing documents, attending a conference or appearing as a witness.
- Reasonably asserting their rights or supporting someone else's rights under legislation.
- Making an allegation that a person has acted unlawfully under legislation.

Victimisation may include for example:

- Moving an employee to a position with less responsibilities while their complaint is being considered.
- Denying an employee, the opportunity of a promotion because they made a complaint.
- Providing a critical reference to an employee because they made a complaint.
- Dismissing an employee or refusing further contract work because they made a complaint.

Additionally, Brunel requires our people to:

- Behave in a way that is fair and does not unreasonably offend, humiliate, intimidate, belittle, undermine, scare, threaten, exclude, or embarrass anyone it is directed at, or anyone who sees or overhears it.
- Behave in a way that is respectful, inclusive and that does not constitute any form of harassment, discrimination, or bullying.
- If safe to do so, intervene or report when you see or know of behaviour that may cause offence, distress, or harm to others. (See our Grievance Handling Policy).
- Not engage in any behaviour of victimisation or retaliation against anyone who has lodged a complaint about harassment, discrimination, or bullying.
- Keep formal investigations confidential. It is unacceptable to talk to other workers or contractors about any complaints of harassment, discrimination or bullying whether you are the person who reported an issue, participated in inquiries or are the subject of inquiries about your behaviour.

All workers are required to comply with our Code of Conduct, policies, procedures, and systems of work developed in accordance with this policy. Workers found to have engaged in the conduct outlined in this policy might be counselled, warned, or disciplined. Severe or repeated breaches can lead to formal discipline and possible termination of contract.



Tania Sinibaldi  
Managing Director  
May 2023

## Electronic Communications Policy

### Our Purpose

Brunel is driven by its core value of INTEGRITY to ensure all forms of electronic communication is of a high standard that serves the interest and reputation of Brunel and its clients. Brunel seeks to maintain a competitive advantage, serve our clients by providing our workers secure and timely access to IT equipment, tools, online services, and resources necessary for undertaking their work. Access to these resources is provided by Brunel and/or their clients and is based on trust and all electronic media, and services remain the property of the organisation with the purpose to facilitate and support the organisations business.

This policy is designed to express our philosophy regarding electronic communication and to set the general principles workers should apply when using electronic media and services.

To achieve our purpose Brunel will:

- Provide workers with secure and timely access to Brunel provided IT equipment, online services, and resources necessary for undertaking their work where applicable.
- Provide training and support to workers using Brunel provided IT equipment, online service, and resources necessary for undertaking their work where applicable.
- Monitor all usage as required (while using provided IT services) when applicable including tracking the content of emails, collaboration, and instant messaging platforms, browsing history, downloads and use of social media and professional networking sites. Monitoring is applicable to Brunel and its clients due to organisational reliance on information gathered, stored, processed, and delivered by applications, platforms, and their associated communications facilities.

Additionally, Brunel requires our people to:

- Ensure email and internet services are not used to solicit or endorse any non-job-related commercial ventures, outside organisations, religious and/or political causes or criminal activity.
- Ensure email and internet services are not used to access, store, or transmit material of a defamatory, obscene, offensive, or harassing nature, including but not limited to, sexually explicit material, photographs, cartoons, jokes and negative racial or gender specific messages.
- Not store or transit information from email and internet services of a sensitive, confidential, or personal nature (not job related).
- Ensure information is not sent to any media outlet (newspapers, television, radio or social media or professional networking site) without prior authorisation. Only an authorised Brunel or client spokesperson may make statements on behalf of Brunel or its clients.
- Compose emails professionally with consideration given to the intended recipients.
- Not save or share Brunel data with external parties on non-Brunel approved online storage services and non-encrypted external storage devices such as USB drives, hard drives, CD/DVD's is prohibited.
- Not auto forward emails to an external mail address as this is not permitted.
- Treat network and wireless access granted by Brunel, or its clients in the same manner as outlined within this policy as a minimum, and within the expected requirements of Brunel or its clients.

All workers are accountable for their use of electronic communications just as they are for other conduct and communications in the workplace this includes the use of social media and professional networking sites. Failing to comply with this Policy could result in disciplinary action and possible termination of contract.



Tania Sinibaldi  
Managing Director  
May 2023



## Discipline & Termination Policy

### Our Purpose

Brunel is driven by core values of PASSION FOR PEOPLE and high standards of INTEGRITY, and we are committed to strengthening our culture everyday through consistent behaviour in line with these values. Brunel leaders, employees and contractors are expected to meet all of Brunel's and Client requirements by conforming to the various policies and procedures that govern Brunel's operations.

Brunel wants to ensure that employees are treated fairly, equally, consistently, and are given the opportunity to be successful on their role. To achieve this Brunel has set out a disciplinary process, the application of various levels of this process will be dependent on the severity of an employee's conduct. An employee's performance will be considered poor or unsatisfactory if the employee is repeatedly not meeting the requirements of their role (as set out in the employee's position description, contract of employment, key performance indicators, company policies, or as communicated to the employee otherwise). Misconduct is an action of an employee that breaches our code of conduct, policies, or failure to follow a lawful and reasonable direction.

To achieve our purpose Brunel will:

Ensure management of employee performance is understood to be a key supervisory responsibility and leaders are trained to effectively manage this process, and the procedure is designed to ensure the following when applicable.

- Discussion of problem areas with effected personnel as soon as possible after an issue is identified.
- Define where clear improvements need to be achieved.
- Assistance and guidance on how improvements are to be achieved.
- Take appropriate action if the performance or behaviour is of such a serious nature that immediate response is required.

If an employee's performance or conduct does not improve following informal counselling Brunel may decide to commence a formal disciplinary process which could include verbal warnings, performance improvement plans, written warnings, and termination of employment. In extreme cases of poor performance or misconduct it may be appropriate to terminate employment without any previous warning having been given.

Serious misconduct is wilful and/or deliberate behaviour by an employee that is inconsistent with the continuation of employment, including but not limited to:

- Refusal to comply with a lawful and reasonable direction given by management or a supervisor.
- Dishonest behaviour and/or acting in a way that is inconsistent with the best interests of the Company.
- Being convicted of a criminal offence which may have the effect of bringing the Company into serious disrepute or affecting the ability of the employee to meet obligations under the employee's employment contract.
- Theft or misappropriation of company / client time or property.
- Being under the influence of alcohol and/or illegal drugs whilst at work or on Company property.
- Acts of bullying, harassment or discrimination (including sexual harassment and harassment on the ground of sex);
- Threatening, violent, or offensive behaviour.
- Conduct that causes imminent, and serious risk to the health, or safety, of a person or the reputation, viability, or profitability of the Company.

All employees are required to comply with our Code of Conduct, policies, procedures, and systems of work developed in accordance with this policy, failure to do so may result in disciplinary action, including termination of contract.



Tania Sinibaldi  
Managing Director  
May 2023

## Grievance Handling Policy

### Our Purpose

Brunel is driven by core values of PASSION FOR PEOPLE and aim to foster good relations amongst our people and between workers and management. We also acknowledge that problems can arise at work that may sometimes cause you to feel aggrieved. A grievance can be in relation to safety issues, discrimination, bullying, and harassment including sexual harassment or any other employment related decision or behaviour that a reasonable person would consider is unfair, unjust, or upsetting.

A grievance can be dealt with informally by approaching the involved party in your grievance if you feel comfortable in doing so. The involved person/s may be unaware of the effect of their behaviour or decision on you and this may give them a chance to redress the situation. If uncomfortable, you can contact your supervisor a Brunel representative or Brunel's HR department and they may be able to approach the person to speak informally about your grievance unless it poses a health and safety risk, and formal action is required.

If you do decide to make a formal complaint, this can be done by putting the complaint in writing or reporting it to your supervisor, Brunel representative or HR department.

In the event of a formal complaint Brunel will:

- Ensure grievances will be treated with confidentiality (except where Brunel deems it is necessary to disclose the complaint for the purpose of dealing with it effectively; disclosure will be no wider than is strictly necessary).
- Take grievances seriously, handle impartially, and take any steps in accordance with the principles of procedural fairness and offering you the right to a support person at any stage of the process.
- Where a grievance cannot be resolved informally, and Brunel deems an investigation is required, the matter will be investigated by such appropriate person as Brunel deems appropriate.
- Workers who raise grievances are protected from victimisation and grievances will be dealt with promptly, considering all the circumstances.
- If the complaint is substantiated, appropriate action will be taken as set out in this policy.
- If the complaint is unsubstantiated, you will generally be given an explanation as to these findings.
- If the complaint is found to have been fabricated or vexatious, appropriate disciplinary action may be taken against you up to and including termination of employment.
- If you do not feel the above-mentioned reporting procedures are an option to address your concern, you can contact the whistle-blower officer via the SpeakUp line in Australia on 1800 452 051.

If the investigation reveals that your complaint is valid, several actions may be taken, depending on the nature of the complaint. The person against whom the complaint is made may be asked to give you a written apology, they may be given a written warning, counselling, transfer, demotion, or may be subjected to disciplinary action up to and including termination of employment. If the investigation is inconclusive, i.e., the complaint cannot be proved due to lack of evidence or the conduct is not sufficiently serious to justify disciplinary action, Brunel may nevertheless take several actions. These may include training and/or monitoring of relevant workers.

If the complaint is found to have been completely fabricated or raised vexatiously, appropriate action may be taken against you in accordance with the Disciplinary and Termination Policy.

If you are not satisfied with the way in which your grievance was handled, you may have the option of raising your complaint within the organisation with senior management or external bodies, such as the Australian Human Rights Commission, Fair Work Ombudsman, relevant State Anti-Discrimination/EEO commissions.



Tania Sinibaldi  
Managing Director  
May 2023

## First Nations People Participation and Employment Policy

### Our Purpose

Brunel's PASSION FOR PEOPLE is our underpinning core value, driving our commitment to creating a workplace culture that fosters inclusiveness, promotes diversity, and embraces the unique skills and qualities of all its people. Inspired by our global ESG Framework, Brunel Australasia strives to enrich our workforce through inclusion, understanding and appreciation of First Nations cultures. Brunel has invested in internal resources and strategies to attract, retain, support and work with our clients to develop First Nations talent. We are passionate about providing the opportunity to increase training, employment, and supplier opportunities for First Nations people within Brunel and our Clients. We endeavour to develop long-term beneficial and reciprocal partnerships aligned with the commitments as outlined below.

To achieve our purpose Brunel is committed to:

#### Leading an Inclusive Culture:

- Ensure opportunities to increase First Nations participation are actively sought, planned, and executed.
- Build and promote awareness of First Nations cultures and issues within Brunel, and aid First Nations people to understand the culture and expectations at Brunel.

#### Education:

- Educate Brunel staff about First Nations culture and beliefs through cultural competency sessions to aid successful and respectful engagement, support, and development in the workplace.
- Provide educational opportunities for our clients on best practices to attract and retain First Nations people.

#### Recruiting, Developing & Retaining Talent

- Work to increase the number of First Nations people trained and employed by Brunel.
- Support the development of First Nations sub-contractor including, where appropriate, engagement on our projects.
- Ensure our recruitment processes are transparent and respectful.
- Partner with our clients to provide education and pathways for First Nations people in the workplace and prepare them for future challenges through continuous upskilling.

#### Community

- Implement social and community-based initiatives to support the development of First Nations people and enterprises.
- Seek opportunities to engage with, understand and support our clients and the First Nations communities in areas where we operate.
- Promote the availability and capability of First Nations enterprises and individual in procurement practices.
- Seek to understand and respect the diverse range of cultural and social matters relating to our and our client's relationship with First Nations communities.

Brunel Australasia has an active Diversity, Equity and Inclusion Council committed to identifying and implementing initiatives with a focus on providing more inclusive work environments and broader community engagement for issues affective people from diverse backgrounds, including members of First Nations communities.



Tania Sinibaldi  
Managing Director  
May 2023

## Modern Slavery Policy

### Our Purpose

Brunel has a zero-tolerance for modern slavery and rejects any form of it including forced labour, human trafficking or child labour in its operations or supply chain. Brunel expects all who have, or seek to have, a business relationship with the Company to familiarise themselves with this policy and to act in a way that is consistent with its values of ENTREPRENEURSHIP, INTEGRITY, RESULTS DRIVEN and PASSION FOR PEOPLE.

This policy applies to all persons working for or on behalf of the Company, in any capacity, including directors, workers, consultants and any other third-party representative. We respect the human rights of our people, customers and those of our suppliers and business partners. Our Values of INTEGRITY and PASSION FOR PEOPLE will guide all decision making, ensuring we commit to a high standard of corporate governance which promote the long-term sustainability and ongoing success of our business.

To achieve our purpose, Brunel will:

- Risk assessment - Identify and manage risks related to human rights across our business and through our supply chain management.
- Our commitment - Ensure our code of conduct sets out the standards of behaviour we expect of our business and our people.
- Due diligence - Monitor and survey, where applicable, our suppliers and business partners to ensure they operate in accordance with the Modern Slavery Act 2018 (Cth).
- Training and awareness - Provide training to ensure our people have a good understanding of and respect for human rights. The purpose of the training is to assist our people to identify and evaluate risks relating to modern slavery.
- Reporting – Produce an annual modern slavery statement that outlines the steps taken to address modern slavery risks in our business and supply chain and make the statement publicly available on our website.
- Continuous improvement – continually review our policies and procedures, via stakeholder engagement and collaboration, to prevent and address modern slavery risks.

Our whistleblowing arrangements provide an avenue to raise concerns about modern slavery and we encourage the reporting of any genuine concerns about modern slavery relating to our workers, business, or supply chain.

This policy will be used to underpin and inform any statement on slavery and human trafficking that Brunel is required to produce in accordance with the *Modern Slavery Act 2018 (Cth)*.



Tania Sinibaldi  
Managing Director  
May 2023

## Data processing at Brunel

In the performance of our business Brunel International N.V. and its subsidiaries, ('Brunel' or 'we') processes personal data of business partners, candidates, and employees (all together 'data subjects'). We are committed to protect personal data in compliance with applicable laws ensuring personal data remains private, accurate and secure. Our Data Protection Policy is based on the principles of the European General Data Protection Regulation ('GDPR'). When local privacy legislation requires stricter measures than described in our Data Protection Policy or related policies, the local regulations prevail, respecting the principles of our Data Protection Policy.

### Our principles for processing personal data

All processing of personal data is based on a legal basis. We actively inform all data subjects personal data processing. We only process personal data for the purposes for which they were originally collected and, in a way, compatible with those purposes, limited to what is adequate, relevant, and necessary for those purposes.

We take reasonable steps to rectify or delete inaccurate personal data to keep the data accurate. We do not retain personal data longer than necessary for the realisation of our processing purpose(s) or as permitted by law. Each Brunel subsidiary is bound by our Intra Group Agreement for the transfer of personal data around the world. Before sharing personal data with third parties, we conclude data processing agreements.

### Protection of personal data

We give priority to adequately secure personal data and to adopt physical, technical, and organisational measures to ensure the security of the same, including the prevention of alteration, loss, damage, unauthorised processing, or access. We ensure that employees only have access to personal data on a need-to-know basis (role-based access rights).

Our digital infrastructure is constantly monitored, and we send personal data through secure connections. Threats or attacks can be detected at an early stage, whereupon we will take action. These measures are documented in our Data Security Management Policy, which is reviewed periodically.

Employees are trained when joining the company and then annually thereafter, to ensure the safe handling of personal data and to familiarize them with Brunel's policies and procedures. Under our Data Breach Policy personal data breaches are reported as soon as possible.

### Description and scope of processing operations

In the recruitment process Brunel uses a database to match candidates with vacancies. Our employees select and assess candidates based on the available information. This information may have been provided by data subjects to Brunel or made available through public sources such as social media platforms. We will always ask for consent to include personal data in our database. We process client personal data for entering and performing agreements, establishing, and maintaining business relationships and to improve our services and business operations. See our Privacy Policy for more information ([www.brunel.net/privacy-policy](http://www.brunel.net/privacy-policy)).

### Types of personal data

The types of information we collect and hold, will vary depending on the data subject's dealings with us. This information is likely to include amongst others: contact details, personal details, official documentation, and work-related information. For more details, please see our Privacy Policy.

### Privacy requests

Data subjects whose personal data we hold, have the right to withdraw consent, to access personal data or to have the same deleted if Brunel no longer requires that data. Any request or complaint can be submitted by completing a web form that is included in our Privacy Policy (section *What are your Rights?*).

## **Compliance**

All employees are required to comply with policies, procedures and systems of work developed in accordance with this policy. The implementation and effectiveness of this policy will be reviewed in line with the global standard audit schedule.



Tania Sinibaldi  
Managing Director  
May 2023

## Quality Policy

### Our Purpose

Brunel Australasia is led by its key value of INTEGRITY to continuously strive to delight our customers with outstanding solutions in its provision of professional and technical resources. Committed to high quality process, we will provide solutions and professional services connecting the most talented and experienced specialists with both present-day and pioneering projects.

Our PASSION FOR PEOPLE guides us to work in partnership and consult with our customers, stakeholders, and communities to set clear expectations in a manner that consistently meets and exceeds quality standards. By incorporating the requirements of stakeholders within our quality management system and processes we can regularly monitor and review our performance. This ensures we maintain high standards and drive a culture of continuous improvement across our business operations and the services we provide.

In our commitment to quality, Brunel Australasia will continuously improve, implement, and maintain a business management system in accordance with the appropriate International Standards described in ISO 9001:2015.

To achieve our purpose Brunel will:

- Incorporate a culture of continuous improvement using the LEAN methodology to encourage thinking to create an enterprise that aligns customer satisfaction with employee satisfaction while driving innovative services.
- Ensure our people are enabled to deliver quality services through training of our systems and processes and how they can positively contribute to achieve the objectives of this policy.
- Regularly monitor and review our performance through key performance indicators and customer feedback to continually improve the effectiveness of our business operations and suitability of the services we provide.
- Measure, monitor, review, and continually improve our Quality Management System and processes to achieve a high level of compliance with statutory, legislative, regulatory and industry standard requirements.
- Determine and effectively manage risks and opportunities to enhance the ability of the business to respond, plan and achieve its service quality and objectives.
- Schedule yearly internal and external audits across all areas of the Quality Management System in accordance with ISO 9001:2015.
- Communicate audit results in Management Reviews to determine strategic quality objectives are met and ensure prompt action will be implemented in respect of corrective and preventative actions, complaints, observations, and recommendations.

The maintenance and continuous improvement of the quality of our services will be assured by a commitment from management and our people extending across all our functions and on all levels. The implementation and effectiveness of all Policies including the Quality Policy will be reviewed in line with the Quality Audit Schedule.



Tania Sinibaldi  
Managing Director  
February 2023



## Sustainability Policy

### Our Purpose

At Brunel, we take our responsibility toward society and the environment seriously. We acknowledge that as a recruitment and professional solutions company operating across the Australasian Region, there are significant opportunities for emission and waste reduction. *Passion for People* and *Integrity* in our operations are not only key components of our core values but are also reflected in our culture and strategy to care for the environment. We aim to demonstrate our commitment through our actions - to encourage innovation and positively contribute to a healthier planet and a better future for generations to come.

With these goals in mind, our organisation assumes responsibility for implementing this policy and providing the appropriate resources to achieve its purpose, including a commitment to grow and continuously improve our environmental management system in accordance with ISO 14001:2015.

To achieve our purpose Brunel will:

- Reduce our environmental footprint by:
  - Implementing energy-efficient practices and equipment in our offices.
  - Minimising paper consumption through digital workflows and responsible printing practices.
  - Utilising sustainable transportation choices, including encouraging video conferencing and public transport when possible.
  - Measuring & monitoring Brunel's power consumption and carbon footprint, in alignment with Brunel's ongoing global commitment to produce net zero emissions – achieved in December 2022.
  - Supporting the green initiatives, objectives, and practices identified by the Brunel Foundation
  - Supporting environmentally conscious partners and suppliers.
- Actively empower sustainable practices by engaging our workers, clients, and partners to participate in our sustainability journey by:
  - Providing them with information and resources on sustainable practices.
  - Encouraging feedback and suggestions for further sustainability improvements.
  - Recognising and rewarding contributions towards our sustainability goals.

Additionally, we expect all workers, clients, and partners to:

- Uphold our commitment to sustainability by aligning their actions with this policy.
- Be mindful of their environmental impact and adopt sustainable practices when engaging with our services.
- Report any concerns or suggestions related to sustainability to the relevant personnel.

This policy is subject to continuous review and improvement as we strive to enhance our contribution to a sustainable future. We are committed to transparency and will communicate our sustainability progress regularly through available channels.



Tania Sinibaldi  
Managing Director  
March 2024