

POLICIES, PRINCIPALS AND PROCEDURES

CODE FOR PROFESSIONAL PRACTICE PRINCIPALS

General Principles

- Employees will observe a high standard of ethics, integrity and professional conduct.
- Ethical behaviour is not simply compliance with legal requirements; it extends to honesty, equity, integrity and social responsibility in all dealings. It is behaviour that holds up to disclosure and to public scrutiny.
- All employees are required to sign a “Statement of Commitment” to abide by the Code for Professional Practice and to support the mission of Makibe Aust.
- The Schedule to this Code form part of the Code and operate as a guideline to assist employees to meet their obligations arising under the Code’s Principles.

Principle 1—Confidentiality and Privacy

- Employees will take reasonable steps to maintain the confidentiality and privacy of candidate, client, and member information.
- Permission must be sought before disclosing confidential information.

Principle 2—Honest Dealings

- Employees will act honestly in all dealings with candidates, clients and employees.
- In the course of representing a candidate or client, an employee shall not knowingly:
 - Make a false statement of material fact;
 - Fail to disclose a material fact
 - Make a representation as to future matters without having reasonable grounds for making it.
- Employees must adhere to principals of truth in advertising.
- Employees will only advertise permanent positions for which they have permission to recruit.
- All fees, charges and services provided must be explicitly and fully disclosed to clients prior to the acceptance of an assignment, or prior to any work being undertaken for a client.
- Employees will not take on assignments that could result in their inability to pay temporary/contract workers.

Principle 3—Respect for Work Relationships

- Employees will not undertake actions that may unfairly or unlawfully jeopardize a candidate’s employment.
- Employees will not undertake actions that may unfairly or unlawfully interfere in work relationships established by others.

- Employees shall not attempt unfairly or unlawfully to prevent a candidate or temporary/contract worker from seeking work from other sources.
- Employees will respect the rights of clients who have elected to change their staff service suppliers. Employees must act lawfully, fairly and ethically in respect of their involvement in transition arrangements.

Principle 4—Respect for Laws

- Employees must comply with all legal, statutory and government requirements.
- Employees will not engage in any form of collusive practices.
- Employees shall take reasonable steps to ensure, so far as practicable, that all new employees honour their legal obligations to previous employers.

Principle 5—Respect for Safety

- Employees will act diligently in assessing risks to candidates, clients and Employees.
- Employees will not knowingly put at risk candidates, clients or Employees.
- Employees shall inform their temporary/contract workers whenever they have reason to believe that any particular assignment causes an occupational health and safety risk.

Principle 6—Respect for Certainty of Engagement

- Employees will ensure that workers are given details of their work conditions, the nature of the work to be undertaken, rates of pay and pay arrangements.
- Any variation to the engagement can only occur with prior notification to the worker.

Principle 7—Professional Knowledge

- Employees will work diligently to develop and maintain a satisfactory and up to date level of relevant professional knowledge.
- Employees will ensure that their staff is adequately trained and skilled to undertake their responsibilities.

Principle 8—Good Order

- Member misconduct will be referred to the RCSA Disciplinary Committee. Subject to any appeal rights, its findings will be binding on members.
- Disputes between Employees, and other parties who agree, will be referred to the RCSA Disciplinary Committee for resolution. Its findings will be binding on Employees and other parties.
- Employees must bring to the attention of the RCSA any violations of this Code by any member at the earliest possible time.

Employees are encouraged to use process of negotiation, mediation and arbitration in order to resolve disputes and should do so wherever practicable.

QUALITY POLICY

Providing Continuous and Controlled Process

Makibe Aust. has established itself as a significant player in the recruitment industry. Makibe Aust. was formed to supply quality Permanent and Contract staff to the Australian and International industry sectors. For those companies whose future success depends on the calibre of people on their team, Makibe Aust. is rapidly emerging as the irresistible first choice for professional recruitment solutions.

We believe that consistency in quality of service is the key to success. As a means of demonstrating our firm commitment to providing quality services to our clients, applicants, candidates, temporary staff and contractors, Makibe Aust. management will implement, review and constantly improve a Quality System, in accordance with the requirements of ISO 9001. All permanent Makibe Aust. staff will be trained in this system and will be encouraged to identify and assist with improvements to it.

Makibe Aust. is an active member of the Recruitment Consulting Services Association. We adhere strictly to the Association's Code of Ethics and ensure that every member of our staff is aware of the importance we attach to it.

WORK HEALTH FITNESS FOR DUTY POLICY

Providing Healthy & Safe Employees

Makibe Aust. is committed to providing a healthy and safe work place for all employees; to allow employees to perform their tasks to their maximum potential and efficiency in a planned, organized and controlled manner without undue risk to their health and safety.

The inappropriate use of Alcohol and other Drugs by Makibe Aust. personnel will not be tolerated as it may lead to impairment and an increased risk to the health and safety of employees.

Makibe Aust. may elect to randomly screen for Alcohol or Drugs and any person found to have blood levels above the prescribed legal limits will be dealt with in accordance with the Makibe Aust. Performance Management Procedures.

Where Makibe Aust. personnel are working at a Client's premises, we will support and adhere to any additional requirements regarding Fitness for Duty that may be imposed by the client.

SMOKE, DRUG AND ALCOHOL POLICY

1. Purpose & Scope

This document provides an overview of Makibe Aust. policy on smoking, drugs and alcohol in the workplace.

2. Procedure

2.1 Smoking

Makibe Aust. supports a non-smoking policy in all areas of the workplace. Makibe Aust. has designated smoking areas (outside of buildings) for smokers to use. Smokers are requested to restrict smoking to designated breaks.

2.2 Drugs

Makibe Aust. strictly supports a drug-free workplace. Any employee/ contractor who takes, or is in the possession of drugs on company premises not prescribed by a registered medical practitioner, or is intoxicated from these drugs during prescribed hours of employment will be appropriately disciplined. This may lead to summary dismissal.

Any casual employee failing a random drug/alcohol test by our client will be deemed not fit for duty and sent home. Depending on result may also be finished and not reassigned.

Prior to summarily dismissing an employee please contact the General Manager for advice.

2.3 Alcohol

Alcohol is not to be excessively consumed on company premises or at company functions. Any employee/contractor who is intoxicated during the prescribed employment hours will receive appropriate disciplinary action.

Driving a company vehicle whilst under the influence of drugs or alcohol is strictly prohibited. If an employee is found intoxicated, they will receive appropriate disciplinary action that may lead to dismissal.

For further advice on any of the above please contact either the General Manager or senior management.

PRIVACY POLICY

The National Privacy Principles established by the Privacy Act 1988 apply to Makibe Aust.

Type of Personal Information held:

Personal information that we collect and hold usually falls into the following categories:

- Candidate information submitted and obtained from the candidate and other sources in connection with applications for work;
- Work performance information;
- Information about incidents in the workplace;
- Staff information;
- Information obtained to assist in managing client and business relationships;

Purposes for which Makibe Aust. hold personal information:

We primarily hold personal information for the following:

- Recruitment;
- Staff Management;
- Training;
- Client and Business Relationship management;

Disclosures

Makibe Aust. may disclose your personal information for the purposes for which it is primarily held or for a related secondary purpose. In some cases we may only disclose information with your consent. We may disclose your personal information where we are under a legal duty to do so.

Contractors

We contract out a number of services from time to time. Our contractors may see some of your personal information. Typically, our contractors would include I.T. contractors and database designers.

Inquiries and Complaints

You can make further enquiries or complaints about our Privacy Policies to our General Manager at: Makibe Aust. (02) 4631 6700 or to the office of the Federal Privacy Commissioner.

Access

Subject to some exceptions that are set out in the National Privacy Principles, you can gain access to the personal information that we hold about you. We do refuse access if it would interfere with the privacy rights of other persons or if it breaches any confidentiality that attaches to that information.

If you wish to obtain access to your personal information you should contact our General Manager. You will need to be in a position to verify your identity. We might impose a moderate charge in providing access. Our Quality Systems & Training Manager would discuss these with you.

You should also anticipate that it may take a little time to process your application for access as there may be a need to retrieve information from storage and review information in order to determine what information may be provided.

FIRE AND EMERGENCY EVACUATION SAFETY POLICY

All Makibe Aust. employees must be familiar with the fire safety policy and procedures.

Within one (1) month of employment, all staff should be briefed on the regulations by the nominated Fire Warden, be aware of their local Fire Warden and familiarize themselves with fire equipment location and emergency exits. Makibe Aust. employees are to participate in emergency evacuation procedure training as the occasions arise.

In the event of fire:

- Notify the Fire Warden or senior management either by telephone or personal contact immediately and advise on location and condition of fire.
- Raise the alarm by operating the closest manual alarm point.
- Advise the Fire Warden.
- Advise property/building management.
- Keep calm so an orderly evacuation can occur if necessary.
- Makibe Aust. employees are to stay at designated evacuation site.
- Fire Warden to complete employee register.
- Makibe Aust. employees are to remain at evacuation site until cleared by the Fire Warden to return safely to office site.

WORKPLACE HEALTH AND SAFETY POLICY

Providing Safe & Healthy Workplaces

Makibe Aust. is committed to:

- Providing a healthy and safe work place for all employees /contractors/ visitors
- Eliminating/minimizing all risk and incidents to all employees/contractors/visitors
- Allow employees/contractors/visitors to perform their tasks to their maximum potential and efficiency in a planned, organized and controlled manner with controlled risk to their health or safety.

Makibe Aust. will continue to address hazard control, accident prevention and training priorities in pursuit of a Best Practice Health and Safety culture. Acceptance of the following responsibilities is essential to the success of this policy:

All Makibe Aust. management shall:

- Comply with the relevant legislation in all States where Makibe Aust. has operations regarding WH&S and Workers Compensation.
- Take effective action to provide and maintain a healthy and safe work place.
- Promote communication about Health and Safety as a normal component of all aspects of work.
- Ensure every effort is made to support Clients in their endeavour to improve Health and Safety performance.
- Review and monitor the WH&S System annually to achieve continual improvement.

All Makibe Aust. employees shall:

- Work in a Healthy and Safe manner in accordance with established standards and procedures.
- Encourage others to work in a Healthy and Safe manner.
- Promptly report accidents, sub-standard practices or conditions that become apparent. Report any hazards ASAP to Makibe Aust. management.
- Co-operate and participate with management in the promotion of Health and Safety in the work place.
- Report any requested change of duties to their Makibe Aust. manager/consultant.

FATIGUE MANAGEMENT POLICY

Accountability

Fatigue is an issue that affects our managers and employees in different ways. Reducing the risks associated with fatigue is a shared responsibility that requires reasonable actions to minimize the risk of fatigue-related accidents and injuries, therefore:

Management will be responsible for minimizing the risks associated with work-related fatigue. Makibe Aust. will;

- Develop an appropriate "Fatigue Management Plan" to identify, assess and manage the risks associated with fatigue. This "Plan" will be developed in consultation with employees and clients. This "Plan" will be reviewed on a regular basis to reflect changes in work and improvements in the methods of fatigue management.
- Inform employees for whom fatigue is a potential safety hazard, successfully complete a competency-based training program that enables them to;
 - Identify the risks associated with fatigue
 - Identify and implement appropriate strategies for minimizing fatigue-related risk
 - Determine whether their behaviour is consistent with the "Fatigue Management Plan".
- Continue to review, monitor actual hours worked and improve fatigue management practices. Employees will be responsible for minimizing the risks associated with non-work related sources of fatigue. All employees are responsible for;
 - Seeing that they understand and execute their responsibilities
 - Seeing that they successfully complete all relevant training
 - Identify report and manage any actual or potential risks
 - Using their allocated time away from work to obtain an amount of sleep sufficient to organizational safety requirements.
 - Informing the appropriate manager if they have not obtained sufficient sleep.

Deployment

Regular reviews will be conducted to ensure the "Fatigue Management Plan" is effective in managing fatigue.

Management will be responsible for seeing that work practices do not create inappropriate levels of fatigue for workers or volunteers and that risk assessments will be carried out where fatigue levels may affect the safe conduct of work.

Employees and their representatives will be consulted in the formulation, maintenance and review of the "Fatigue Management Plan".

MANUAL HANDLING POLICY

1. Purpose

The purpose of this policy is to ensure the identification, assessment and control of all manual handling tasks performed by staff, in accordance with the requirements of the Work Health and Safety Act (2011) and the Occupational Health and Safety Regulation (2011).

2. Definition

Manual handling means any activity requiring the use of force exerted by a person to lift, lower, push, pull, carry or otherwise move, hold or restrain any animate or inanimate object.

3. Statement of Intent

In order to prevent or reduce the severity of injuries arising from manual handling are designed to be ling activities in the workplace, Makibe Aust. will ensure that, as far as practicable:

- a. The plant, equipment and containers used in the workplace are designed, constructed and maintained to be safe and without risk to health and safety when manually handled.
- b. The work practices carried out in the workplace involving manual handling are designed to be safe and without risk to health and safety and
- c. The working environment is designed to be consistent with safe manual handling activities. Makibe Aust. will also ensure that:
- d. Supervisors and staff are aware of policy, procedure and responsibilities in relation to manual handling

4. Implementation

Safe manual handling is a continuous process which involves three recurring states:

- I. Identification of the risks of all manual handling tasks
- II. Assessment of the importance of different risk factors
- III. Control of the risks through work redesign, use of appropriate mechanical aids and the provision of training and information to supervisors and staff.

5. Responsibilities

Identification of risks:

- a. **Supervisors / Recruitment Consultants** are responsible for identifying manual handling tasks and their risks by consultation with staff and by direct observation.
- b. This might involve consideration of:
 - Actions and movements to ensure they do not cause undue discomfort or pain
 - Workplace and work station layout
 - Working posture of staff to reduce the possibility of injury
 - Duration and frequency of manual handling
 - Weights, locations of loads and distances moved
 - Work organization and environment
 - Skills and awareness of staff in safe handling procedures

- c. **Workers** are responsible advising their supervisor/s, consultants of manual handling tasks they perform which pose occupational, health and safety risks.
- d. **Recruitment Consultant / Client Management** are responsible for noting any tasks involving manual handling during inspections, and for advising the appropriate supervisors of any identified risks.
- e. **Recruitment Management / Client Management** are responsible for analysing injury statistics and assisting supervisors and staff in order to facilitate the identification process.

6. Assessment

Consultants, supervisors and workers should consult with the OHS Manager and with Recruitment Management to determine the relative importance of the various risk factors and set priorities for addressing those risks.

7. Control

- a. **Recruitment Consultants / Supervisors** should consult with the OHS Manager, Director and any other appropriate experts to decide how to reduce risks by:
 - Redesigning the workplace, plant, equipment or containers used, in order to avoid twisting, side bending, excessive reach or heavy loads
 - Assessing whether mechanical aids will reduce the risks (trolleys, tresses, etc)
 - Determining training and educational needs of workers with regard to the hazards and/or appropriate techniques to reduce the risk of injury. Control of manual handling risks is a continuous process which involves the re-training of all new workers and the re-training of existing workers.
- b. **Workers** should observe all instructions and directions relating to control measures to reduce manual handling risks.
- c. **Recruitment Consultant / Client Management** should monitor the effectiveness of control measures in consultation with supervisors and workers to:
 - Ensure that changes are adopted correctly and reduce risk of injury
 - Determine if further improvements or modification to the workplace are needed
 - Ensure that the changes are not causing other occupational health and safety problems
- d. **Recruitment Management / Client Management** will coordinate the provision of appropriate training and education to supervisors and employees and provide advice on strategies to control manual handling risks.

8. Monitoring

The Recruitment Management and Client Management will monitor the process of identification, assessment and control of manual handling risks and evaluate the effectiveness of this policy.

EQUAL EMPLOYMENT OPPORTUNITY & ANTI-DISCRIMINATION POLICY

1. Purpose

This document outlines MAKIBE AUST.'s policy of ensuring Equal Employment Opportunity and a workplace free of Discrimination.

2. Procedure

Makibe Aust. recognizes the various legislative provisions and in line with our values, has developed a policy to ensure Equal Employment Opportunity for all and a workplace free of Discrimination. Each manager is responsible for ensuring his or her department/ workplace is free of any discrimination.

2.1 Recruitment and Promotion of Employees

Makibe Aust. shall recruit and promote employees based on individual merit and performance. All recruitment and promotion decisions will be made without regard to any of the following grounds:

- Sex, race, colour, lawful sexual preference, age, physical or mental disability (unless it will affect the health and safety of the person or other persons)
- Marital status, parental status, religion. Political opinion
- Trade union activity

Each manager is responsible for ensuring that he or she abides by this policy on a daily basis.

2.2 Other Discrimination in the Workplace

Management at all levels is to ensure that no form of discrimination, whether direct or indirect occurs in the Makibe Aust. work environment.

Direct discrimination is treating one person less favourably than others because of any of the listed attributes.

Indirect discrimination is where an employer, or some other person, may enforce a criterion for a position E.G. a person must wear a cap as part of a uniform, but will not allow somebody who wears a turban to apply. Even though the wearing of the cap is only for the uniform and is not part of the actual work.

2.3 Harassment Officer

Makibe Aust. personnel who feel they have been harassed or discriminated against should contact their Manager, General Manager or Director in that order.

REHABILITATION POLICY

Makibe Aust. recognizes that there are substantial benefits to be gained from rehabilitation principles and practices and is committed to implementing them at this workplace. We recognize that the Workers' Compensation and Rehabilitation Act 2003 and the Workers' Compensation and Rehabilitation Regulation 2003 provide the legislative support for workplace rehabilitation activities along with the relevant legislation in each State where Makibe Aust. have employees working.

Experience has shown that workplace rehabilitation assists the healing process and helps restore the worker's normal work function sooner. Workplace rehabilitation includes early provision of timely and adequate services, including suitable duties programs, and aims to:

- Maintain injured or ill workers at work ***or***
- Ensure the worker's earliest possible return to work ***or***
- Maximize the worker's independent functioning ***and***
- Provide for durable employment.

This policy has been developed as a joint worker-management agreement.

Makibe Aust. is committed to:

- Providing a safe and healthy work environment, but in the event of an injury or illness, making sure workplace rehabilitation is started as soon as possible in accordance with medical advice.
- Ensuring appropriate suitable duties are made available to injured or ill workers to facilitate their safe and early return to work. These duties must be consistent with the current medical certificate and will be time limited.
- Respecting the confidential nature of medical and rehabilitation information and ensuring there will be both verbal and written confidentiality.
- Ensuring all workers are aware of that, in the event of injury or illness, they will be consulted to ensure a structured and safe return to work that will not disadvantage them.
- Complying with legislative obligations with respect to the standard for rehabilitation.
- Adopting a multidisciplinary approach to rehabilitation as required.
- Reviewing this policy and procedures at least every three years to ensure it continues to meet legislative requirements and the needs of all parties.

Workplace rehabilitation procedures have been developed to support this policy. The procedures define key terms, describe key roles and outline steps in the return to work process.

The following page contains the procedures in relation to this policy.

1. Purpose

The purpose of the Makibe Aust. Rehabilitation policy is to ensure:

- That the culture of acceptance for workplace rehabilitation exists;
- We have a process to support an early safe return of any worker who has an injury/illness;
- The position of the rehabilitation and return to work coordinator is adequately resourced; and
- Adequate storage is provided for rehabilitation files to maintain confidentiality of this information.

2. Definitions

2.1 Rehabilitation

Rehabilitation of a worker is a process designed to ensure the worker's earliest possible return to work or to maximize the worker's independent functioning. Rehabilitation involves the provision of approved services, services provided by a registered person, suitable duties programs or necessary and reasonable aids or equipment to an injured worker. All employers must take all reasonable steps to assist or provide their injured workers with rehabilitation for the period for which the worker is entitled compensation.

2.2 Return to Work Coordinator (RTWC)

The RTWC is a person who has satisfactorily completed a workplace Return to Work Coordinators course accredited by icare. The RTWC is the link between the injured worker, treating doctor, management, supervisors, icare authorities in each State, rehabilitation providers and any other relevant parties.

Our Return to Work Coordinator is **Norm Geist** – norm@makibeaustralia.com.au

2.3 Suitable Duties Programs

These specially selected duties at the workplace are a means of providing a monitored and graduated return to normal duties. They are:

- Matched to the capabilities of the worker;
- Time limited and regularly upgraded according to his/her level of recovery and treating medical doctor's advice.

A copy of each workers suitable duties program will be provided to the insurer.

HARASSMENT AND BULLYING POLICY

1. Definition

Harassment and bullying in the workplace can be defined as the “repeated less favourable treatment of a person/s by another or others in a workplace, which may be considered unreasonable and inappropriate workplace practice”.

2. Policy

Makibe Aust. will not tolerate any employee harassing or bullying a fellow employee in the workplace.

2.1 Responsibility

Each Makibe Aust. manager is responsible for ensuring their workplace is free of bullying and/or physical/sexual harassment, and to deal with any harassment/bullying issues in line with this policy. Makibe Aust. will ensure that employees who come forward about harassment/bullying in the workplace will not suffer adverse job consequences as a result of any complaint made.

2.2 Procedures for dealing with complaints

If an employee is in the situation where they feel they are being harassed or bullied by another employee they are to report it immediately to their manager. If the manager is the harasser, then the employee should report it directly to the General Manager or Director.

Makibe Aust. is committed to and responsible for:

- Taking every reported complaint of harassment/bullying seriously; responding to anyone who comes forward with complaints and attempt to resolve immediately; ensuring that all complaints are kept strictly confidential.
- Interviewing the complainant/s and taking a full statement with accurate details of the issue. Taking accurate notes, typing these notes and ensuring the complainant/s sign the record of interview as accurate and complete.
- Interviewing the accused employee/s and witnesses if appropriate. Taking accurate notes, typing these notes and ensuring each person signs the record of interview as accurate.
- On finalisation of all the facts, a decision needs to be made based on the outcome of the investigation. Such action may include:
 - Counselling
 - Formal warnings
 - Dismissal
- At all times, ensure that all parties involved are not discriminated against in any way during the investigation process.

ENVIRONMENTAL MANAGEMENT POLICY

1. Purpose

To work with employees, contractors, visitors and business partners to achieve compatibility between economic development and the maintenance of the environment to minimise harm.

2. Objective

Makibe Aust. is committed to conducting our business in an environmentally conscious and responsible manner. We seek the co-operation of our employees and business partners in ensuring our organisational practices are conducted with minimal environmental impact at our offices, and customer sites.

3. Policy

Makibe Aust. will endeavour to minimise impact on the following:

- Atmospheric emissions
- Site contamination and spills
- Noise Emission
- Damage to flora and fauna
- Storm water management
- Unnecessary energy consumption

To fulfil this commitment, Makibe Aust. will observe all environment laws and promote environmental awareness among all staff to increase understanding of environmental matters.

Makibe Aust. will also actively take part in the following:

- Assess Eco-footprint to identify environmental impacts and move towards more sustainable practices
- Identify waste streams and options for effective waste management
- Improve purchasing (buy recycled materials, reduce waste, use less harmful/volatile chemicals)
- Improve storage (reduce quantity, waste and spills, reduce odours by keeping containers closed)
- Conserve energy (eco-friendly lights, turn lights off, emergency efficient equipment).
- Conserve water (install water saving accessories, repair leaks)
- Preserve water ways (clearly mark and protect storm water drains)
- Emergency planning and spill response
- Improve education/awareness
- Notify relevant authority in the event of a major environmental impact immediately.

Makibe Aust. will ensure employees comply with relevant legislation, company and customer standards and procedures at all times.

ACKNOWLEDGEMENT:

I (*undersigned*) acknowledge that I have received the Makibe Australia Pty Ltd, (*also referred to as Makibe Aust. in this documentation*), Registration Pack along with their Policies, Principals and Procedures documentation. I hereby concede that I have read through and fully understand all that has been presented to me and further understand all points covered in the induction process. I fully agree to comply with all procedures and instructions given to me by Makibe Aust. and I understand that as a Makibe Aust. temporary employee my responsibilities are as follows:

- To work in a safe manner, in accordance with on-site instructions and procedures;
- Where required be qualified and licensed for work undertaken;
- To be fit for work and to disclose any health problems or issues;
- Notify Makibe Aust. if my job changes or assignment is extended and I will not commence until I gain Makibe Aust.'s approval;
- If unable to commence an assignment on time, I will notify Makibe Aust. as soon as possible, prior to the commencement date;
- Should I sustain an injury or illness on the job, I will immediately notify my on-site supervisor and Makibe Aust. as soon as possible.

SIGNATURE OF
EMPLOYEE: _____ DATE: ____ / ____ / ____

NAME: (*please print*) _____

SIGNATURE OF
MAKIBE CONSULTANT: _____ DATE: ____ / ____ / ____

NAME: (*please print*) _____