



Code of Conduct

Proprietary & Confidential Information

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CHANGE CONTROL TABLE

Date	Changes	Who	Version
July-2008	Original Draft/ Release to Senior Management for Review	JPF	V0.01
July-2008	Amendments/Formatting	JPF	V0.02
4 August-2008	Publication and Release	JPF	V1.0
June 2011	3 year cycle review amendments/ Release to Senior Management for Review	JPF	V1.1
June 2011	Amendments/Formatting	JPF	V1.2
11 July-2011	Publication and Release	JPF	V2.0

Our policy documents are provided as a principle or rule to guide decisions and achieve rational outcomes by JP Flynn.

Whereas the policy will contain the 'what' and the 'why', JP Flynn Standard Operating Procedures (SOP's) and Service Delivery Procedures (SDP's) contain the 'what', the 'how', the 'where', and the 'when'.

Policies can assist in both subjective and objective decision making.

The material contained in this document is accurate at the time of printing however due to the rapidly changing insurance restoration environment cannot be guaranteed as a permanent guide and will be subject to review to ensure our agreed procedures are best practice.

All our systems and procedures are predicated on ensuring our values are maintained and the customer service provided by JP Flynn is industry leading.

We invite and encourage you at all times to provide feedback on all our documented policies, processes and procedures.

OVERVIEW

We, at JP Flynn, take pride in our reputation for dealing with our customers and stakeholders with absolute integrity and respect.

This Code of Conduct, including our core values, captures the spirit of JP Flynn and provides a framework for all of us to use to guide our decisions, actions and behaviour.

The Code is for our protection.

In general, by conducting ourselves in a manner consistent with our core values, we will be meeting the standards required by the Code.

Using this Code of Conduct requires you to exercise your judgment concerning ethical behaviour. If you are not sure about an issue, seek advice from your manager

As a rule of thumb, if you are not sure whether an activity might be in breach of this Code, ask yourself the following question:

“Is what I am about to do consistent with our core values?”

If you do not feel comfortable, then you should reconsider your action, and if you are not sure, discuss the matter with your manager.

References in this Code to JP Flynn are to Jamail Holdings Proprietary Limited trading as JP Flynn Builders.

Refer to the Reporting of Concerns Policy if you want to report a concern under the Code of Conduct or other policies and for information on the protection offered to you if you report a concern.

What is the code and its purpose?

Our Code of Conduct is a statement of our corporate ethics and philosophy, and underpins our business decisions, actions and behaviour.

The Code provides clear guidelines to managers and staff, so that there is a common understanding of the values and expected standards of behaviour for all.

The objective of the Code is to make sure that high standards of corporate and individual behaviour are observed in conducting the business of JP Flynn and to provide support for those behaviours.

Who does the code apply to?

Our Code of Conduct applies to all employees and managers of JP Flynn.

COMMITMENT BY SENIOR MANAGEMENT TO THE CODE

There is a high level of support for the Code

The Code has been endorsed by the Managing Director. The Senior Management Team is committed to JP Flynn complying with the law and promoting a culture of fair and ethical behaviour.

WHAT ARE THE PRINCIPLES UNDERLYING OUR BUSINESS AND BEHAVIOURS?

Our values

Our core values reflect the culture at JP Flynn and include:

- Social responsibility, professionalism and integrity in our dealings with customers, suppliers and in our service delivery.
- Accuracy, clarity and honesty in all our communication.
- Well organised and efficient in the execution of our work.
- Mutual respect.

Our mission

- To ensure our customers are provided with a consistent service delivery that is both efficient and reliable.
- To provide the highest standards of quality in our service delivery.
- To ensure our customers enjoy their experience in dealing with JP Flynn.
- To be environmentally responsible, recycle where possible, and engage in non-polluting and non-wasteful work practices.
- To be socially responsible and professional when dealing with our staff, our customers, our suppliers, our sub-trades and all partnerships that make up our value chain.
- To provide our staff with a safe and stable working environment.

Commitment to the environment

We will continue to refine our own business practices to minimise waste and energy use, recycle consumables and compensate the environment for other activities. We will promote and develop solutions for sustainable environmental practices by our employees, contractors and suppliers who make up our value chain.

WE VALUE OUR STAFF AND CONTRACTORS AND AIM TO BE AN EMPLOYER OF CHOICE

<p>Occupational health and safety</p>	<p>We are committed to providing a safe workplace and to making sure that none of our business decisions compromise our commitment to health and safety.</p>
<p>Equal opportunity employment</p>	<p>JP Flynn Builders is committed to equality of opportunity in employment for all employees and contractors.</p> <p>The concept of equal opportunity is based on respect, tolerance and a belief in the value of all individuals.</p> <p>JP Flynn’s Equal Opportunity Policy has been developed in line with the Victorian Equal Opportunity Act 2010.</p> <p>At JP Flynn our role and responsibility is to help contribute to the achievement of equality between the sexes. A work place that is inclusive, comprehensive and fair, and produces equal work place outcomes is every employer’s responsibility. JP Flynn has a legal responsibility to provide a work place environment that does not discriminate, directly or indirectly, against any person.</p>
<p>Training and further education support</p>	<p>We recognise the importance of maintaining and improving our skills. Support is available to enable us to maintain and improve on our individual and team performances, including internal training and development and financial assistance for external training.</p>

WE PUT THE INTERESTS OF JP FLYNN AND OUR CUSTOMERS FIRST

Conflicts of interest	<p>A conflict of interest occurs when we have an interest outside JP Flynn (whether private or otherwise) that could prejudice or improperly influence our judgment or the performance of our professional duties. We recognise that our primary business responsibility is to JP Flynn.</p> <p>If a conflict of interest arises or may arise, this is to be disclosed by an employee to their direct manager, so that it can be dealt with appropriately. Depending on the nature and extent of the conflict, the measures taken to protect against a conflict of interest may include that the employee does not participate in the relevant decision or activity, or disclosing the conflict to third parties affected by it and making sure that the employee or full time contractor is not the sole decision-maker on the matter. Example: You or a family member has lodged an insurance claim to which JP Flynn has been appointed to manage.</p>
Improper use of position, information and assets	<p>We do not use our position, nor information acquired by virtue of our position, to obtain an advantage for ourselves or someone else or to cause detriment to JP Flynn.</p> <p>We do not misuse company assets. We use all company materials, services and facilities provided by JP Flynn (for example, buildings, property, computers, computer systems and data, telephones, office equipment, corporate credit cards, motor vehicles, building materials and contractors associated with JP Flynn) in accordance with the terms on which they are provided or supplied.</p>
Gifts and hospitality	<p>We must not accept or give a gift or courtesy that could either lead to, or be seen to lead to, a conflict of interest such that our judgment is prejudiced or improperly influenced.</p>
Bribes	<p>We do not offer or accept bribes.</p>
Drug and alcohol usage	<p>We all want to work in a safe, healthy and productive workplace. Therefore, we do not use or possess illicit drugs or consume alcohol at any site or office of JP Flynn.</p>

Confidentiality and privacy	As a manager, employee or full time contractor, we each owe an obligation of confidentiality to the company. This obligation covers information about JP Flynn and its customers.
Compliance with laws and policies	Each manager, employee or full time contractor is required to comply with laws and with the policies of JP Flynn, including this Code of Conduct. Any member of staff who breaches this obligation may face disciplinary action, including termination of employment. In the case of a breach of the law, there may be legal consequences for the manager, employee or full time contractor. Each manager is to promote compliance with laws and with the policies of JP Flynn.
Reputation of JP Flynn	No manager, employee or full time contractor may do anything that is likely to adversely affect the reputation of JP Flynn.