
Code of Ethics and Conduct Policy

CountPlus Limited (ACN 126 990 832)
As adopted by the CountPlus Board

1. Introduction

- 1.1 CountPlus Limited and its associated entities (as defined by the *Corporations Act 2001* (Cth)) (together the “**Company**”) are firmly committed to ensuring that all of the Company’s employees (including Principals and Directors), contractors, subcontractors, consultants and any other persons performing work for the Company, including work experience students and volunteers (collectively “**Workers**”) observe the highest standards of ethical behaviour and conduct. The Company’s Code of Ethics & Conduct (the “**Code**”) and ethical stance are an integral part of our approach to business and are consistent with our purpose and values. Our behaviour and actions always need to be consistent with our core values of achievement, credibility and teamwork. The purpose of this Code is to ensure that our professional reputation is maintained at all times and to promote a workplace in which people treat each other with courtesy and respect.
- 1.2 The Company aims to provide all Workers with a workplace that is safe, conducive to productive activity and free from discrimination, bullying, harassment, victimisation and vilification. Discrimination, bullying, harassment, victimisation and vilification are unacceptable and unlawful behaviours and will not be tolerated under any circumstances. Tribunals and Courts may also impose personal fines on an individual found guilty of unlawful discrimination, bullying, harassment, victimisation or vilification or for breach of work health and safety legislation.
- 1.3 The Company may amend or vary this policy, at its absolute discretion from time to time.
- 1.4 It is imperative that all Workers, including Principals and Directors, read and understand the Code and promptly raise any questions they may have regarding the Code with the Principal of the Company or their respective Partner Firm or the CountPlus Chief Executive Officer (CEO).

2. Purpose of the Code

- 2.1 All Workers are bound by the Code and each Worker is expected at all times to act consistently with the values, commitments and ethical standards set out in the Code.

The objective of the Code is to ensure that:

- (a) high standards of corporate and individual behaviour are observed by all Workers in the context of their employment with or engagement by the Company;
- (b) workers are aware of their responsibilities to the Company under their contract of employment or engagement and all relevant legislation; and
- (c) all persons dealing with the Company, whether they are Workers, shareholders, service providers, or competitors can be guided by the values and policies of the Company.

3. Obligations to Abide by the Code

- 3.1 Adherence to the Code is a term of each Worker’s employment with or engagement by the Company. Violation of the Code by any Worker, or other unethical behaviour which may affect the reputation of the Company, may be subject to disciplinary action including termination of employment or engagement, depending on the severity of the incident.
- 3.2 Breaches of the Code may also be unlawful under Federal and State legislation including the following:

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3.2.1 Federal

- (a) Racial Discrimination Act 1975 (Cth)
- (b) Sex Discrimination Act 1984 (Cth)
- (c) Disability Discrimination Act 1992 (Cth)
- (d) Age Discrimination Act 2004 (Cth)
- (e) Fair Work Act 2009 (Cth)

3.2.2 New South Wales

- (a) Anti-Discrimination Act 1977 (NSW)
- (b) Work Health and Safety Act 2011 (NSW)

3.2.3 Northern Territory

- (a) Anti-Discrimination Act 1996 (NT)
- (b) Work Health and Safety (National Uniform Legislation) Act 2011 (NT)

3.2.4 Australian Capital Territory

- (a) Discrimination Act 1991 (ACT)
- (b) Work Health and Safety Act 2011 (ACT)

3.2.5 Queensland

- (a) Anti-Discrimination Act 1991 (QLD)
- (b) Work Health and Safety Act 2011 (QLD)

3.2.6 South Australia

- (a) Civil Liability Act 1936 (SA)
- (b) Equal Opportunity Act 1984 (SA)
- (c) Racial Vilification Act 1996 (SA)
- (d) Whistleblowers Protection Act 1993 (SA)
- (e) Work Health and Safety Act 2012 (SA)

3.2.7 Victoria

- (a) Charter of Human Rights and Responsibilities Act 2006 (Vic)
- (b) Equal Opportunity Act 2010 (Vic)
- (c) Racial and Religious Tolerance Act 2001 (Vic)
- (d) Occupational Health and Safety Act 2004 (Vic)

3.2.8 Tasmania

- (a) Anti-Discrimination Act 1998 (Tas)
- (b) Work Health and Safety Act 2012 (Tas)

3.2.9 Western Australia

- (a) Equal Opportunity Act 1984 (WA)
- (b) Occupational Safety and Health Act 1984 (WA)

4. Primary Obligations of the Code

- 4.1 All Workers are required to meet the following standards of ethical behaviour both at the office premises, anywhere else work is performed for the Company (for example, at a client's premises), and at any other time when an activity is being undertaken in connection with employment or engagement, including outside the workplace:
- (a) act honestly and with integrity, fairness and equity in all aspects of their employment with or engagement by the Company;
 - (b) do not discriminate against, harass, bully, victimise or vilify other Workers, clients or other persons;
 - (c) take reasonable care to ensure the health and safety of themselves and other Workers;
 - (d) observe the rule and spirit of all laws and regulations which govern the operation of the Company, its business environment, and its employment practices;
 - (e) exercise due care and diligence in fulfilling their duties and exercising the powers that may be attached to their position;
 - (f) act in the best interests of the Company;
 - (g) avoid any real or perceived conflict of interest;
 - (h) observe the principles of independence in decisions and dealings with both internal and external stakeholders;
 - (i) respect the confidentiality of all confidential information acquired in the course of their duties and do not use or disclose such information to third parties without authorisation or unless required by law;
 - (j) uphold fiduciary responsibilities to the Company's shareholders;
 - (k) respect the rights of Workers, shareholders, service providers, and the community at large and ensure that the Company and its Workers meet their legal and other obligations to these parties;
 - (l) do not take advantage of Company property, information, or their position, or opportunities arising from these, for personal gain or to compete with the Company;
 - (m) set a standard of honesty, fairness, integrity, diligence and competency in all that they do, so that their conduct will not discredit the Company;
 - (n) do not knowingly participate in any illegal or unethical activity;
 - (o) actively promote compliance with laws, rules, regulations and this Code;
 - (p) not do anything which could reasonably be perceived to negatively affect the Company's reputation; and
 - (q) conduct themselves in such a way that the Company will be held in high regard by the general public and within the industry.

5. Care and Diligence

- 5.1 Workers must exercise due care and diligence in the performance of their duties and responsibilities. This should include such activities as ensuring the accuracy of all information on which decision-making is based, attending to detail in all aspects of work, being mindful of the sensitivities of others, protecting confidentiality and being courteous, open and honest.
- 5.2 The products and services provided by the Company will be of high quality. The Company and its Workers will deliver these products and services in a timely and equitable manner, and give customer satisfaction a high priority.

6. Honesty and Integrity

- 6.1 The Company and its Workers will act with integrity and honesty and deal fairly in all internal and external dealings. Dishonest, misleading, deceptive or fraudulent behaviour (to either Workers, clients or customers) is not tolerated. Misuse of Company assets (including any information a Worker may learn as a result of their employment with the Company) for personal gain or financial advantage is not tolerated. Any Worker who deliberately chooses to ignore or cover up the improper conduct of any other person may be considered to have assisted in committing an offence and may be subject to disciplinary action, including termination of employment or engagement, or referral by the Company to the police.

7. Discrimination

- 7.1 Federal and state legislation prohibits discrimination on a variety of grounds including, but not limited to; race, colour, sex, religion, political opinion, age, criminal record, marital status, mental or physical disability, sexual preference and physical features. Subject to very limited circumstances (permitted by legislation) the Company and its Workers will not make any decision based on the abovementioned characteristics, including, but not limited to, when determining whether an employee is offered a job, a Worker is engaged, an employee is promoted, a Worker is to receive any particular conditions or other benefits, or when an employee's employment is to be terminated or Workers engagement is terminated. Discrimination can occur:
- (a) **directly**, when a person or group is, or is proposed to be, treated less favourably because of a personal characteristic protected by law. For example a female employee being demoted because she is pregnant, telling jokes about someone or teasing them because of their race, or making threats to someone because of a disability; or
 - (b) **indirectly**, when a requirement or condition which may be neutral on its face has the effect of disadvantaging people with a protected personal characteristic and is unreasonable in the circumstances. For example, a requirement that employees work full time to receive a particular benefit may amount to indirect discrimination against employees with family responsibilities who work part-time.
- 7.2 It is also not permitted to treat a person unfavourably because of an assumption they have or will have in future a characteristic listed above or because they have a personal association with someone having any of those characteristics.

8. Workplace Harassment

- 8.1 Harassment may be a form of unlawful discrimination. In general, harassment is any form of behaviour that is unwelcome and in circumstances in which a reasonable person would have anticipated the possibility that the person harassed would be humiliated, offended or intimidated.
- 8.2 Workplace harassment usually consists of a pattern of unwelcome behaviour. However, it can consist of just one act where this is of a serious nature. Also there is no requirement that the harasser intended to humiliate, offend, intimidate or otherwise harm in order for it to be unlawful.
- 8.3 Workplace harassment can be based on race, disability, age, pregnancy, marital status, homosexuality, transgender, or HIV/AIDS status.
- 8.4 The most common form of workplace harassment is sexual harassment. Sexual harassment is behaviour of a sexual nature which is unwelcome and occurs in circumstances in which a reasonable person would have anticipated the possibility that the person harassed would be offended, intimidated or humiliated. There is no requirement that the harasser intends to offend humiliate or intimidate another person. A person's intention is irrelevant.

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- 8.5 Examples of harassment include, but are not limited to, comments about a person's body or appearance, staring at a person or parts of their body, gender based insults or taunting, sexist or racial jokes, asking questions or divulging confidences of a sexual nature, repeated requests for a date, sexually suggestive behaviour, physical conduct of a sexual nature, making jokes or derogatory comments based on a personal characteristic, pornographic or sexual emails or screensavers and bullying.
- 8.6 Conduct of a sexual nature which is not specifically directed at a particular person can also be sexual harassment and/or sex discrimination. For example, office banter of a sexual nature may intimidate or offend others who hear the discussion but do not participate in it, whether or not they expressly object to it.
- 8.7 Sexual harassment is not a genuinely invited, reciprocated, or welcome flirtation, friendship or consensual sexual relationship.
- 8.8 Offenders will be held legally responsible for their unlawful actions and will be subject to disciplinary action, up to and including termination of employment or engagement.

9. Bullying

- 9.1 Bullying in a workplace context consists of a repeated, unreasonable pattern of behaviour, directed towards an individual by another person or group of people, which may be considered to be unreasonable or inappropriate workplace behaviour, and/or which may create a risk to health and safety. Unreasonable behaviour includes, but is not limited to, such behaviour that a reasonable person, having regard to all circumstances, would anticipate would humiliate, intimidate, undermine or threaten.
- 9.2 Examples include, but are not limited to, verbal or physical abuse, excluding or isolating individuals, psychological harassment, deliberately undermining work performance, belittling an individual's contribution or opinion, publicly criticising an individual or group of individuals, deliberately undermining work performance, for example, by refusing to give sufficient instructions, imposing unnecessary deadlines or impossible assignments, and misusing a performance management system, or a return to work process. If a person is bullied because of a protected legislative ground listed above, such as race, it may be unlawful. Bullying can also be a contravention of health and safety legislation.

10. Discrimination, Harassment or Bullying Outside the Office

- 10.1 Workers should be aware that discrimination, harassment and bullying that takes place outside the office premises can still be unlawful conduct and will be considered unacceptable by the Company. By way of example, Workers should not engage in such conduct at a work-related Christmas party; during phone calls or visits to another Worker at his or her home; or while visiting a client's workplace.

11. Victimisation

- 11.1 Victimisation occurs where a person subjects, or threatens to subject, a person to detriment because he or she has complained or intends to complain about, being harassed, sexually harassed, discriminated against, bullied or vilified. Victimisation also includes any conduct which disadvantages (or threatens to disadvantage) a person who is assisting or supporting a person who has been subjected to behaviour in breach or allegedly in breach of the Code (such as a witness to a workplace investigation).

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- 11.2 Victimization can take any form including, intimidation, exclusion from team or company activities, withholding opportunities, terminating the employment or engagement of an individual or refusing them a promotion and threatening a person or limiting access to benefits.
- 11.3 If an individual lodges a complaint pursuant to legislation, or even merely raises a complaint about a matter that may be unlawful under legislation, it is unlawful to victimise that individual or any person assisting with the complaint. There are legislative penalties for individuals and corporations, which include fines and imprisonment.

12. Vilification

- 12.1 Vilification is the use of acts or words (whether spoken or written) in public which provoke hatred, ridicule or contempt for a person or a group of people. Vilification is unlawful if it is on the grounds of race, homosexuality or HIV/AIDS. Examples of vilification include displaying or communicating offensive material (including via social media and the internet), calling people names and making offensive comments.

13. Electronic Communications Usage

- 13.1 Workers are provided the use of technological mediums such as telephones, faxes, Intranet and the Internet to assist in the performance of their day-to-day communication with customers, fellow Workers and members of the general public for purposes in connection with their work. Use of these resources should be restricted to business related purposes only. Workers must ensure that the use of these resources is in accordance with this Code and any other applicable Company policies.
- 13.2 Workers must ensure they do not:
- (a) disclose their user ID or Passwords to any party outside the Company, or other Workers;
 - (b) disclose or release confidential information or sensitive data to unauthorised Workers or others (within or outside the Company), either directly or indirectly;
 - (c) use the Company's electronic communication facilities in such a way that may bring the Company into disrepute or expose the Company to legal prosecution;
 - (d) use the Company's electronic communication facilities for criminal or unlawful purposes;
 - (e) introduce any software, files, or other electronic data of a personal, offensive, or inappropriate nature to any of the Company's systems; and
 - (f) use the Company's electronic communication facilities for carrying out tasks related to employment or engagement outside the Company.
- 13.3 All material and information on the Company's systems and all associated rights (including intellectual property rights) remain the property of the Company. All emails in the Company's mail system are logged to allow archive access to all emails in the event that the Company needs to prove an action to a client, or some other legal or business-related issue that requires very accurate records of correspondence.
- 13.4 Email messages are official records of the Company and, therefore, the Company reserves the right to access all messages sent over the email system. The Company may examine a Worker's personal email directory at any time without notice. Workers are advised not to enter personal data into the email system which that individual wishes to remain private and confidential, and should not have any expectation of privacy in relation to these emails.
- 13.5 When using a browser on any part of the Company's IT system the following practices are prohibited:
- (a) visiting sites of a pornographic nature;

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- (b) visiting sites of an offensive nature;
- (c) visiting any other type of site unrelated to the Company's business (subject to minimal personal use on a necessity basis only);
- (d) downloading large files unrelated to the Company's business;
- (e) giving the Company's credit card details; and
- (f) submitting or disclosing the Company's confidential or sensitive information/documents.

13.6 The Company embraces the use of social media as a corporate communications and community-building tool. However, as in all communications, all Workers need to use good judgment about what material appears online, and in what context.

13.7 Inappropriate use of social media includes, but is not limited to:

- (a) conducting private business;
- (b) using discriminatory, defamatory, abusive or otherwise objectionable language in content;
- (c) accessing, downloading or transmitting any kind of sexually explicit material or violent/ graphic images (without medical purpose);
- (d) accessing, downloading or transmitting information on the use and construction of weapons, explosives and other tools of violence or terrorism;
- (e) accessing, downloading or transmitting any material deemed to be illegal under legislation;
- (f) accessing, downloading or transmitting hate speech, racist material, material extolling the inherent or moral superiority or inferiority of a particular race/ethnic group/sexual orientation, racial epithets or religious bigotry;
- (g) compromising the privacy of any person;
- (h) using services for personal political purposes;
- (i) attempting to gain unauthorised access to the computing resources of other organisations; and
- (j) disruption of the integrity of the Company's data or information services.

13.8 Use of social media in such ways (whether in their capacity as a Worker or in their personal capacity to the extent that this may be linked to their employment or engagement) is unacceptable and may result in disciplinary action, up to and including termination of their employment or engagement.

14. Information Security & Integrity

14.1 Workers must be particularly wary of accepting or allowing programs such as executable files (.exe) to be transferred to or otherwise run or loaded on their PC or workstation (unless sure of exactly what such programs will do, or certain that they have come from a reputable source).

15. Acceptance of Gifts or Benefits

15.1 All Workers are expected to represent and support the Company's values and policies. Workers should never solicit gifts or benefits while performing work and must not be indebted to customers by accepting gifts or benefits. Care must be exercised to ensure that even small gifts or benefits do not entail any obligation or expectation of favours. Benefits include rewards, travel, hospitality, airfares, and other monetary or non-monetary favours.

15.2 It is generally advisable to decline all offers of gifts or benefits. However, it is understood that at times gifts may be offered by way of thank you for contribution and assistance. In such cases, if the value of the gift is clearly under \$300 it may be accepted without approval of the Principal of the Company. However, if the value of the gift could exceed \$300, the Principal of the Company is to be notified of the gift, its approximate value and the type and extent of the relationship with the person offering the gift. A decision will then be made as to whether the Worker may keep the gift, return it, or

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otherwise share it with other Workers or the community (i.e. donate to charity). If the gift is kept, it may need to be detailed in the Company's Alternative Remuneration Register.

- 15.3 To prevent any misunderstandings it is advisable that all gifts and benefits received regardless of the value are reported to the respective Principal of the Company.
- 15.4 In addition, all Workers must comply with and uphold all laws against bribery, corruption and related conduct applying to the Company in all jurisdictions in which the Company operates.
- 15.5 All dealings with politicians and government officials which relate to the Company and its business activities must be conducted at arm's length and with the utmost professionalism, to avoid any perception of attempts to gain advantage or to improperly influence the outcome of an official decision.
- 15.6 Workers must not make any donation or other financial contribution to any political party or candidate for an election or sponsor any organisations (other than in a purely personal capacity) without seeking and obtaining prior approval from the Company Secretary.

16. Disclosure of Information

- 16.1 Information obtained before, during or after a Worker's employment or engagement, whether it concerns the Company, staff or clients, must always be treated as confidential, even after the Worker leaves or ceases their employment or engagement with the Company. Confidential information includes information relating to the business affairs of the Company, as well as the Company's clients or suppliers. If Workers need to gain access to such confidential information, proper authorisation must be obtained. Such information must never be provided to, or discussed with any unauthorised person within or outside the Company or be used for personal/financial advantage. Only in very limited circumstances, generally involving legal matters, can confidential information be disclosed outside the Company.
- 16.2 In addition, personal and sensitive personal information about the Company clients or about other individuals having dealings with the Company must, among other things, be collected, used, disclosed, updated, stored securely and destroyed in accordance with the Australian Privacy Principles (**APPs**) set out in the *Privacy Act 1988* (Cth) and the Company policy on privacy. If you suspect that personal or sensitive personal information is being dealt with otherwise than in accordance with the APPs and the Company policy on privacy, you must refer the matter to the Principal of the Company.

17. Responsibilities to Shareholders and the Broader Financial Community

- 17.1 Failure to comply with these obligations, carry out these commitments, or cause the Company to breach these obligations and commitments may result in disciplinary action up to and including termination of employment or engagement.
- 17.1 It is Management's task to achieve, and the CountPlus Board's role to oversee, the delivery of shareholder value through the sustainable and efficient operation of the Company, sound reporting and risk management practices and exemplary compliance with the continuous disclosure regime.
 - (a) **Transparency:** We will ensure that CountPlus continues to meet the expectations of our shareholders and the financial community in general by maintaining a core principle of transparency in the preparation and delivery of financial information.
 - (b) **Financial Integrity:** We will exercise diligence and good faith in the preparation of financial information and ensure that such information is accurate, timely and represents a true and fair

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view of the financial performance and condition of the organisation and complies with all applicable legislative requirements.

- (c) Safeguarding assets: It is incumbent on all Workers to ensure the maintenance of a sound system of internal controls to safeguard the Company's assets and to manage risk exposure through appropriate forms of control. All Team Managers are responsible for the personnel, assets and systems under their control.
- (d) Privacy: We will safeguard the personal information of shareholders held on CountPlus' Share Register and only release the information according to the law.
- (e) Insider Trading: Directors, principals, senior management and all other Workers must not utilise their position for personal gain or for gain of another person. All Workers must ensure that any information in their possession that is not publicly available and may have a material effect on the CountPlus share price is not provided to anyone who may be influenced to subscribe, buy or sell shares. Further guidance on the insider trading laws is set out in the Securities Trading Policy available on the CountPlus website.
- (f) Dealing in shares of the company: Directors, principals, and senior management and all other Workers shall comply with the trading rules as set out in the Securities Trading Policy.

18. Media Discussions/Public Comment

- 18.1 Workers, other than those specifically authorised, are not permitted to give interviews to the news media (radio, press, television etc) or make public statements on any aspects of the Company or its operations. Workers will not allow press or television photographers to photograph the interior of the Company's premises without prior approval from the Principal of their respective Partner Firm.
- 18.2 Public comment includes public speaking engagements, comments on radio or television, expressing views in letters to newspapers or in books, journals, notices or any form of social media or where it might be expected that the publication or circulation of the comment would spread to the community at large.

19. Work Health and Safety

- 19.1 Both the Company and its Workers have obligations under work health and safety legislation to provide a safe and healthy work environment.
- 19.2 All Workers have a responsibility to:
 - (a) take reasonable care for the health and safety of themselves, other Workers and other people that may be affected by their acts or omissions at work; and
 - (b) co-operate with measures implemented by the Company to comply with requirements imposed under work health and safety laws.

20. Drugs and Alcohol

- 20.1 The Company is committed to maintaining a workplace that is free from the effects of - and eliminating the risks at work that arise from - drug and alcohol use.
- 20.2 The Company prohibits at work the possession, use, consumption, sale, distribution or creation of drugs, except medication legally prescribed by a registered medical practitioner or available over the counter ("**Permitted Medication**").

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- 20.3 The Company prohibits at work the possession, use, consumption, sale, distribution or creation of alcohol, except in accordance with this Code.
- 20.4 Each Worker undertakes that he or she will:
- (a) attend and/or perform work in a fit and proper condition free from the influence of alcohol and/or drugs, except Permitted Medication;
 - (b) not consume alcohol (unless permitted by the Company) or take drugs, except Permitted Medications, whilst at work;
 - (c) not possess alcohol and/or drugs in the workplace, except Permitted Medications;
 - (d) notify the Company if they become aware of another Worker who they suspect is under the influence of alcohol and/or drugs of any nature;
 - (e) notify the Company if they become aware of an actual or suspected alcohol and/or drug related incident or hazard; and
 - (f) act consistently with their obligations under work health and safety legislation to take reasonable care not to adversely affect the health and safety of themselves or others within the workplace; and
 - (g) behave appropriately and professionally at all times when at work or when representing the Company at functions (including by consuming alcohol responsibly at work related events where the consumption of alcohol has been permitted by the Company).
- 20.5 Any Worker who is reasonably suspected of being affected by alcohol and/or drugs contrary to this Code will be required to leave the Company's premises and may be subject to disciplinary action up to and including dismissal.

21. Conflicts of Interest

- 21.1 All Workers must ensure that they do not accept or perform (directly or indirectly) any other work which may give rise to any real or perceived conflict of interest. A conflict of interest occurs if a Worker's loyalties are divided, for example if a Worker or a family member or friend of a Worker has a personal or commercial interest which may interfere, or be perceived to interfere, with the performance of that Worker's duties and responsibilities to the Company, making it difficult for that Worker to perform their role objectively and effectively.
- 21.2 Any Worker who becomes aware of a potential conflict of interest must immediately inform the Company of the potential conflict of interest and work with the Company to take action to remove or manage the potential conflict so as to avoid detriment to the Company. The Worker may be required to stop performing the other work which has given rise to the potential conflict.
- 21.3 All Workers must also ensure that they do not perform work which may give rise to any real or perceived conflict between one client of the Company and another without first disclosing the potential conflict of interest to each client and the Company and receiving each client's written confirmation that it wishes to proceed despite the potential conflict and the Company's consent to do so.

22. How to Deal with Unacceptable Workplace Behaviour

- 22.1 If a person believes that they have been subjected to behaviour which would be in breach of this Code, they should take the following steps:

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- (a) where possible, tell the person that their behaviour is unacceptable, and that it must stop. This is important as silence may be misconstrued as consent;

and/or

- (b) report the behaviour or incident to their manager;

and/or

- (c) make a formal complaint.

22.2 Any formal complaints will be dealt with in accordance with Company policy. Complaints or reports of such behaviour will be treated seriously by the Company and will be investigated confidentially.

22.3 If a Worker believes or knows of behaviour by another Worker which would be in breach of this Code (even if you are not being subjected to that behaviour), they should promptly report such behaviour to their manager.

22.4 Where a person has raised concerns about particular behaviour but does not wish to make a formal complaint, the Company is obliged to consider the matter seriously. If the concerns raised are serious in nature and/or if they may impact any person's health and safety, the Company may be obliged to formally investigate the concerns.

22.5 Workers are responsible for their own actions and claims of discrimination, harassment, bullying, victimisation and vilification may be brought against them directly and against the Company.

22.6 If a complaint is found to be made falsely and wilfully, the person who made the complaint may be subject to disciplinary action, including termination of employment or engagement.

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