



CODE OF CONDUCT & ACCEPTANCE FORM

CODE OF CONDUCT

Including Employee and Contractor Acknowledgement Form

1. Purpose

Highlight Security recognises that the quality of its services depends on the professionalism, judgment and conduct of every person working for or representing the company.

This Code of Conduct establishes the minimum standards of behaviour expected across Highlight Security. It is intended to support lawful, safe, ethical and respectful decision-making and to protect our workers, clients, members of the public and the reputation of the business.

Everyone covered by this Code is expected to consider not only whether an action is lawful, but also whether it is professional, fair and consistent with Highlight Security's responsibilities as a security service provider.

2. Scope

This Code applies to all Highlight Security:

- Directors;
- managers and supervisors;
- employees and casual workers;
- contractors and subcontractors; and
- any other person authorised to perform work or represent Highlight Security.

Suppliers and business partners may also be expected to act consistently with the relevant principles of this Code when providing goods or services to Highlight Security.

3. When the Code Applies

This Code applies whenever a person is performing work for, attending work on behalf of, or representing Highlight Security.

This includes:

- work performed at client sites;
- company offices and operational locations;
- training, inductions and meetings;
- work-related travel;
- company or client functions;
- communications with clients, workers, suppliers and members of the public;
- the use of company systems, property, uniforms or vehicles; and

- online or social-media activity that has a clear connection to Highlight Security or a person's employment or engagement.

Conduct outside ordinary working hours may be addressed where it has a relevant connection to the workplace, affects another worker or client, creates a safety risk, or may reasonably damage Highlight Security's business or reputation.

4. Compliance with the Code

Compliance with this Code and all applicable Highlight Security policies, procedures, site instructions and lawful directions is a requirement of employment or engagement.

All workers and contractors are required to:

- read and understand this Code;
- comply with the standards contained within it;
- seek guidance when unsure about the appropriate course of action;
- complete required training and acknowledgements; and
- report actual or suspected serious misconduct, unlawful conduct or breaches of company policy.

A person remains required to comply with this Code even where an acknowledgement form has not yet been signed.

5. Our Standards of Conduct

Highlight Security expects all work to be performed in accordance with the following standards.

Integrity

We act honestly and make decisions based on what is lawful, ethical and appropriate.

This includes:

- providing accurate information;
- keeping commitments;
- declaring mistakes or concerns promptly;
- refusing bribes, improper payments or inducements;
- avoiding dishonest, fraudulent or misleading conduct; and
- speaking up when something does not appear right.

Professionalism

We perform our duties competently, lawfully and with proper care.

This includes:

- arriving on time and ready for duty;
- following post orders, site instructions and reasonable directions;
- maintaining appropriate communication and reporting standards;
- carrying out duties within the limits of the law and the person's licence, training and authority;
- remaining alert and attentive while on duty; and
- treating every assignment as a professional responsibility.

Respect

We treat colleagues, clients, contractors and members of the public with dignity and consideration.

This includes:

- communicating respectfully;
- remaining calm and professional during conflict;
- respecting cultural, religious and personal differences;
- avoiding abusive, threatening or humiliating conduct;
- considering how our conduct may affect others; and
- assisting in maintaining an inclusive and safe workplace.

Accountability

Every person is responsible for their actions, decisions and work performance.

This includes:

- taking ownership of assigned duties;
- reporting incidents and errors honestly;
- not blaming others or concealing mistakes;
- completing records accurately and on time;
- responding appropriately when a risk or issue is identified; and
- cooperating with investigations and corrective actions.

6. Compliance with Laws and Security Requirements

All workers and contractors must comply with:

- applicable Commonwealth and NSW laws;
- security industry licensing requirements;
- lawful client requirements and site instructions;
- workplace health and safety obligations;
- privacy and confidentiality requirements;
- applicable industrial instruments and employment obligations; and
- Highlight Security policies and procedures.

Workers must not perform security functions outside the authority of their security licence, qualifications, training or assigned role.

Each person is responsible for maintaining any licence, first aid certificate, qualification or clearance required for their duties and must immediately notify management if any required credential is suspended, cancelled, restricted, expired or otherwise affected.

Workers must provide evidence of current licences, first aid certificates, qualifications and clearances when requested by Highlight Security and must not accept or perform a shift where a required credential is no longer current.

7. Human Rights and Fair Treatment

Highlight Security is committed to respecting internationally recognised human rights and conducting its operations in accordance with its Human Rights Policy.

Workers and contractors must:

- treat all persons fairly and with dignity;
- comply with anti-discrimination and workplace conduct requirements;
- avoid conduct involving exploitation, abuse or intimidation;
- respect lawful workplace rights, including freedom of association;
- not participate in forced labour, human trafficking or child labour; and
- report any suspected human-rights concern connected with Highlight Security's operations or supply chain.

8. Conflicts of Interest

Workers and contractors must place their responsibilities to Highlight Security and its clients ahead of any private interest that could improperly influence their work.

An actual, potential or perceived conflict of interest may arise where personal, financial, family or outside business interests could affect—or appear to affect—a person's judgment.

Examples may include:

- undertaking outside employment that creates a conflict of interest, contributes to an unsafe fatigue risk, interferes with rostered duties or involves the misuse of Highlight Security or client information;
- having a financial interest in a supplier or subcontractor;
- awarding work to a friend or relative without disclosure;
- using confidential information for personal gain;
- accepting an inappropriate benefit from a client or supplier; or
- participating in a decision involving a close personal relationship.

Any actual, potential or perceived conflict must be disclosed promptly to a manager or Director. Management will determine whether the conflict can be appropriately managed.

9. Gifts, Benefits, Bribery and Corruption

Highlight Security prohibits bribery, corruption, fraud, extortion and other improper business practices.

Workers and contractors must not:

- offer, request, accept or provide a bribe or secret commission;
- accept cash or cash-equivalent gifts;
- offer or accept a benefit intended to influence a business or operational decision;
- misuse company funds, records or property;
- falsify invoices, timesheets, incident reports or other records; or
- use their position for an improper personal benefit.

Low-value gifts or hospitality may only be accepted where they are lawful, reasonable, infrequent and would not influence—or reasonably appear to influence—the person’s judgment.

Any gift or benefit that may create concern must be disclosed to management before it is accepted wherever practicable.

10. Confidentiality, Privacy and Information Security

Security work may provide access to sensitive information about clients, workers, sites, incidents, security systems and members of the public.

Workers and contractors must:

- protect confidential, personal and operational information;
- only access information required for authorised duties;
- not disclose client information without authority;
- keep passwords, keys, access cards, alarm codes and security instructions secure;

- not photograph, record or distribute restricted information without permission;
- follow client and company privacy requirements;
- secure documents, electronic devices and incident reports;
- report any loss, unauthorised access or suspected data breach immediately; and
- maintain confidentiality after employment or engagement ends.

Confidential information must not be used for personal advantage or shared with friends, relatives, other employers or unauthorised persons.

11. Company and Client Property

Workers and contractors must use company and client property responsibly and only for authorised purposes.

This includes:

- uniforms and identification;
- radios and communication equipment;
- keys and access cards;
- vehicles;
- mobile phones and electronic devices;
- client facilities and equipment;
- documents, records and databases; and
- any other property entrusted to the worker.

Workers must take reasonable steps to prevent loss, theft, damage or misuse and immediately report any missing, damaged or improperly used property.

Company or client property must not be used for unlawful, unauthorised or inappropriate personal purposes.

All property must be returned when requested or when employment or engagement ends.

12. Respectful Workplace Behaviour

Highlight Security does not tolerate unlawful:

- discrimination;
- bullying;
- harassment;
- sexual harassment;
- sex-based harassment;
- victimisation;
- threatening or abusive conduct; or
- conduct creating a workplace environment that is hostile on the ground of sex.

Employment and operational decisions must be based on legitimate business requirements, qualifications, conduct and performance—not on irrelevant personal characteristics.

Workers must not disadvantage or retaliate against anyone who raises a genuine concern, participates in an investigation or exercises a lawful workplace right.

Further requirements are contained in Highlight Security's **Bullying, Harassment and Discrimination Policy**.

13. Workplace Health and Safety

Every person has a responsibility to contribute to a healthy and safe work environment.

Workers and contractors must:

- take reasonable care for their own health and safety;
- avoid conduct that may adversely affect another person's health or safety;
- follow WHS policies, procedures, risk controls and site instructions;
- use required personal protective equipment;
- report hazards, injuries, incidents and near misses promptly;
- stop or avoid commencing work where there is a serious and immediate safety concern;
- cooperate with emergency and incident-response procedures; and
- participate in required consultation, training and investigations.

Further requirements are contained in Highlight Security's **Workplace Health and Safety Policy** and **Incident, Injury, Hazard and Near-Miss Reporting Procedure**.

14. Fitness for Work

Workers and contractors must report for duty physically and mentally capable of performing their work safely and effectively.

A person must not attend or remain at work where their ability to perform duties may be impaired by:

- alcohol;
- illegal drugs;
- misuse of medication;
- fatigue;
- illness or injury; or
- any other condition that creates an unacceptable safety or operational risk.

Workers must promptly disclose any matter affecting their fitness for duty where it may create a safety risk, while only providing medical information reasonably necessary to manage the matter.

Alcohol must not be consumed while on duty or while wearing a Highlight Security uniform or branded clothing in circumstances that may identify the person as representing the company.

Further requirements are contained in Highlight Security's **Fitness for Work Policy**.

15. Personal Presentation and Uniform

Professional presentation is an important part of representing Highlight Security.

Where a uniform is required, workers must:

- attend duty in the correct, clean and serviceable uniform;
- wear approved identification as directed;
- maintain neat and professional grooming;
- wear required safety footwear and protective equipment;
- not modify the uniform without approval;
- not wear Highlight Security-branded clothing while engaging in inappropriate conduct; and
- return issued uniform items when required.

Workers attending meetings or assignments where a uniform is not required must wear clothing appropriate to the role, client environment and nature of the work.

16. Attendance and Performance of Duties

Workers and contractors are expected to:

- attend rostered shifts punctually;
- remain at their assigned post unless relieved or authorised to leave;
- notify management as early as reasonably possible if unable to attend work;
- remain awake, alert and attentive throughout the shift;
- not sleep while on duty;
- complete patrols, logs and assigned duties accurately;
- provide proper handovers;
- follow reasonable and lawful directions; and
- not abandon a shift, post or assignment.

Timesheets, occurrence books, patrol records and other operational documents must accurately reflect the work performed.

Falsifying records or claiming payment for work not performed may constitute serious misconduct.

17. Dealings with Clients and the Public

Workers and contractors must represent Highlight Security professionally and must:

- communicate respectfully and clearly;
- act impartially and without unnecessary aggression;
- remain within their lawful authority;
- use de-escalation and conflict-management techniques where appropriate;
- avoid arguments or personal disputes with clients or members of the public;
- not make unauthorised promises on behalf of Highlight Security;
- refer complaints or media enquiries to management; and
- report any significant client concern promptly.

Security personnel must never misuse their position, uniform, licence or perceived authority to threaten, intimidate, obtain favours or gain personal advantage.

18. Use of Force, Restraint and Weapons

Workers must act lawfully, reasonably and within the limits of their authority, training and assigned responsibilities.

Force must never be used as punishment, retaliation, intimidation or merely to secure compliance where no lawful justification exists.

Any use of force, physical intervention or restraint must be:

- legally justified;
- reasonably necessary in the circumstances;
- proportionate to the risk presented;
- stopped once the need for it ends; and
- reported immediately in accordance with company and client procedures.

Workers must not carry weapons or prohibited items while working unless legally authorised, specifically required for the role and approved by Highlight Security.

19. Social Media and Public Communications

Only persons specifically authorised by Highlight Security may make public statements or publish content on behalf of the company.

Workers and contractors must not use social media to:

- disclose confidential or client information;
- publish photographs or recordings from client sites without permission;
- misrepresent themselves as speaking for Highlight Security;
- bully, harass or discriminate against another person;

- damage the legitimate interests or reputation of Highlight Security or a client;
- post content showing unsafe, unlawful or unprofessional workplace conduct; or
- interfere with the proper performance of their duties.

Personal social-media use must not occur while working where it distracts from operational responsibilities or breaches client site requirements.

Nothing in this section prevents a person from lawfully discussing workplace conditions, seeking assistance from a union or regulator, making a protected complaint or disclosure, or exercising another lawful workplace right.

20. Reporting Concerns and Misconduct

Workers and contractors are encouraged to report actual or suspected:

- illegal conduct;
- fraud, bribery or corruption;
- serious policy breaches;
- unsafe practices;
- discrimination, bullying or harassment;
- improper use of confidential information;
- falsification of records;
- licensing concerns; or
- other unethical or unacceptable conduct.

Concerns may be reported to:

- the worker's supervisor or manager;
- any Highlight Security Director or manager not involved in the matter; or
- **admin@highlightsecurity.com.au**.

Where a concern involves the person who would ordinarily receive the report, it may be raised with another Director who is not involved.

Reports made honestly and in good faith will be taken seriously. Highlight Security prohibits retaliation, victimisation or disadvantage against a person who raises a genuine concern or assists with an investigation.

Information will only be shared with persons who reasonably need it to assess, investigate or resolve the matter, or where disclosure is required by law.

21. Breaches of the Code

A breach of this Code may result in action including:

- counselling or further instruction;

- additional training;
- formal disciplinary action;
- removal from a client site or assignment;
- suspension from duties;
- withdrawal of company property or access;
- termination of employment or engagement;
- termination of a contractor or supplier relationship;
- notification to a client, insurer or regulator where appropriate; or
- referral to police or another relevant authority.

The response will depend on the nature and seriousness of the conduct, the surrounding circumstances, previous conduct and any legal or contractual requirements.

Serious misconduct may result in termination of employment or engagement without notice, subject to an appropriate investigation, a fair process and applicable law.

22. Questions and Guidance

Anyone who is unsure about their responsibilities under this Code should seek guidance before acting.

Questions may be directed to:

- the person's supervisor or manager;
- a Highlight Security Director; or
- **admin@highlightsecurity.com.au**.

23. Policy Review

This Code is owned by the Managing Director and approved by the Directors of Highlight Group Pty Ltd.

It will be reviewed at least every two years or earlier where required due to:

- legislative or regulatory changes;
- changes to company operations;
- significant incidents or complaints;
- client or industry requirements; or
- identified gaps in the Code.

This Code does not form part of any person's contract of employment or engagement and may be amended by Highlight Security from time to time.

APPENDIX A

CODE OF CONDUCT ACKNOWLEDGEMENT AND ACCEPTANCE FORM

I, _____, acknowledge that:

- I have received or been given access to Highlight Security's Code of Conduct;
- I have had an opportunity to read and understand the Code;
- I understand that I may ask my supervisor, manager or a Director for clarification;
- I agree to comply with the Code and all other applicable Highlight Security policies, procedures, site instructions and lawful directions;
- I understand that breaches may result in disciplinary action, removal from duties or termination of my employment or engagement; and
- I understand that the Code continues to apply even if I do not sign this acknowledgement form.

Full Name: _____

Position: _____

Employee/Contractor: _____

Signature: _____

Date: _____

Witness/Manager: _____

Signature: _____

Date: _____

The completed form should be returned to Highlight Security management or emailed to **admin@highlightsecurity.com.au** and retained with the person's employment or contractor records.



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