



Code of Conduct

Introduction

MPH Homes, MPH Commercial and MCorp (collectively known as MPH) is committed to conducting its business in a way that is open and accountable to stakeholders and the wider marketplace. We believe our corporate governance practices are rigorous and of a high standard.

Purpose of the Code

MPH employees are bound by a Code of Conduct and Ethics (“Code”) and the objective of the Code is to ensure that:

- high standards of corporate and individual behaviour are observed by all MPH employees in the context of their employment with MPH;
- employees are aware of their responsibilities to MPH under their contract of employment and
- all people dealing with MPH whether employees, stakeholders, suppliers, customers or competitors can be guided by the stated policies of MPH.

For the purpose of this document “employees” includes MPH contractors and directors.

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Elements of the Code

Mercy - the spirit of responding to one another

- Working in unity and being open to and respectful of the ideas and contributions of others.
- Sharing information, knowledge, and expertise with other employees and striving to impart knowledge to, and to learn from, others.

Dignity - the spirit of humanity

- Treating each other with courtesy and respect, valuing each person as an equal, regardless of their position within the organisation or the area within which they work.
- Recognising the diverse needs of each individual and not unlawfully or unfairly discriminating against any individual on the grounds of race, gender, disability, age, religion, marital status, sexual preference, and so on.

Care - the spirit of compassion

- Recognising each individual's value and contribution, and treating them with sensitivity and care.

Commitment - the spirit of integrity

- Committing to the Company's values, demonstrating honesty, integrity, and humanity in all that we do.

Quality - the spirit of professionalism

- Working to the best of our ability, and aiming to achieve high standards of practice and continuous improvement.
- Maintaining our knowledge and skills to ensure that we can perform our roles with a degree of competence commensurate with our role.
- Encouraging an environment where people own up to mistakes, enabling us, as individuals and as an organisation, to learn and grow from our experiences.
- Staff must ensure their behaviour is respectful, lawful, diligent, professional, ethical, and responsible with respect to the stewardship of resources.



Respectful

Employees will, at all times, be courteous, objective, and helpful when dealing with others. They shall treat members of the public, contractors, clients and other employees honestly, fairly, responsibly, and compassionately.

Employees will behave in a way that upholds MPH's commitment to respecting the dignity, rights, and views of others. Employees must not denigrate any person's cultural, religious, and/or other beliefs, nor engage in any form of bullying, mistreatment, coercion, harassment (including sexual and racial harassment), or any other unethical or unlawful behaviour.

Lawful behaviour

Employees must uphold the laws of Queensland and Australia, and shall not be a party to any breach, evasion or subversion of the law. Employees who believe another employee or other person may be guilty of serious misconduct, including, but not limited to, fraud or other unlawful behaviour, must notify their manager or other appropriate person of their suspicions.

Diligence and professional standards

Employees shall exercise due diligence, care and attention in their positions. They have a personal responsibility to keep their skills and knowledge current, including identifying appropriate professional development opportunities.

Employees should maintain dress standards that are in line with community standards, and consistent with their role and function.

Employees have a duty of care to their clients to take all reasonable steps to avoid causing harm to others, as well as an obligation under the Workplace Health and Safety Act to protect their own safety, health, and welfare and that of others. Any alcohol and/or drug usage must not adversely affect employees' work performance or endanger the health and safety of themselves or others.

Responsible stewardship of resources

Employees shall demonstrate responsible stewardship of resources and avoid unnecessary waste or extravagance. Company resources, whether staff, property, equipment, or facilities, shall be allocated only to official Company business (this may include approved study programs).

Employees should notify their manager if they suspect inappropriate use of resources. Human Resource management decisions, particularly in relation to recruitment, promotion, and access to training and career development opportunities, must be consistent with the Company's policies and procedures, particularly in respect of equity, natural justice, consistency, and avoidance of conflicts of interest.

Ethical standards

Employees must observe appropriate ethical standards in their dealings with staff, clients, contractors and members of the public. These standards include:



- Confidentiality
- Fairness
- Avoidance of conflicts of interest
- Fidelity

Confidentiality

Employees must not disclose confidential information at any time, unless that disclosure is required under law or with the express permission of the Managing Director. Employees must ensure that they have the authority to disclose official information. Normally, disclosure is authorised only where such disclosure is part of the employee's official duties or is prescribed under statute or otherwise required at law. Sensitive documents must be stored appropriately, preferably in a locked environment.

Fairness

Employees, particularly managers, have a responsibility to behave in a way which:

- Sets a good example for others;
- Maintains open, honest communication;
- Ensures staff are treated fairly, equitably, and consistently; and
- Ensures staff understand what is expected (performance standards) and how feedback will be provided.

Avoidance of conflicts of interest

Employees are responsible for avoiding conflicts of interest and, where a personal interest exists, must openly disclose that interest to their manager.

Employees should not use their positions to exercise improper influence, including political influence, for personal advantage either for themselves or for another.

Activities that are party-political and/or are performed on behalf of a professional body must be conducted in a clearly private capacity.

Employees shall not seek or encourage others to give them benefits in return for any decision taken in the course of their employment. (For the purposes of the Code of Conduct, benefits shall include any gifts, remuneration, employment, allowances, subsidies, free goods or services, entertainment, or incentives of any kind.)

Approval must be obtained from an authorised person before employees divulge, publicise, or otherwise release any material in any form which may constitute intellectual property. Unless expressly agreed otherwise, all intellectual property related to the employee's work at the Company belongs to MPH.

Employee responsibility

Adherence to this Code is a condition of employment with MPH. It is the responsibility of all MPH employees and contractors to familiarise themselves and comply with this Code of Conduct. Failure to observe the Code of Conduct may result in disciplinary action, including termination of employment or contractual arrangements.