

CODE OF ETHICAL CONDUCT



1. Scope

To cover all business operations/reasons that MCL Resourcing is involved in.

2. Purpose

To provide a documented statement of the self set code of conduct, to which all of our operations adhere. A Code of Conduct is a “Statement of principles and values that establishes a set of expectations and standards for how an organisation, government body, company, affiliated group or individual will behave, including minimal levels of compliance and disciplinary action for the organisation, its staff and volunteers.”
(Source: *Transparency International 2009*).

1. Staff must not offer or make any bribe, unorthodox or unauthorised payment or inducement of any kind to anyone.
2. Staff must not solicit business by offering any bribe, unorthodox or unofficial personal payment to customers or potential customers.
3. Staff must not accept any kind of bribe, unorthodox or unusual payment or inducement that would not be authorised by MCL Resourcing in the ordinary course of business.
4. Staff must clearly refuse any bribe or unorthodox payment and must do so in a manner that can lead to no misunderstanding or false expectation; and to report any such offers to line management and to The Risk & Compliance Officer immediately.
5. Staff must report any breaches of this policy or of any applicable law even if by doing so they have to disclose their own wrongdoing. Such reports must be passed to The Risk & Compliance Officer.
6. MCL Resourcing requires managers to maintain a working environment where staff can make reports of breaches of this policy in confidence and without fear of reprisals (also refer to point 9).
7. MCL Resourcing expects its business partners, suppliers and contractors to act with integrity and without thought or actions involving bribery and corruption and will, where appropriate, include clauses to this effect in contracts offered to any such third parties.
8. MCL Resourcing will actively investigate all reported allegations of fraud (MCL Resourcing’s Fraud Policy can be requested from The Risk & Compliance Officer), corruption or abuse of position for personal gain involving MCL Resourcing and its staff, wherever they might occur.
9. MCL Resourcing undertakes that, except for knowingly reporting false accusations, every employee may report allegations without fear of retaliation.

10. MCL Resourcing and its staff will not make direct or indirect contributions to political parties, organisations or individuals engaged in politics, as a way of obtaining advantage in business transactions. MCL Resourcing will publicly disclose all its political contributions.
11. MCL Resourcing will ensure that charitable contributions and sponsorships are not used as a subterfuge for bribery. MCL Resourcing will publicly disclose all its charitable contributions and sponsorships.
12. Compliance with this Ethical Code of Business Conduct (and the policy that it forms an integral part of) is mandatory for all staff (including directors) and MCL Resourcing will apply appropriate sanctions for violations of this Code and the policy.
13. MCL Resourcing conducts due diligence before entering into a joint venture or consortium.
14. MCL Resourcing will not channel improper payments through agents or other intermediaries.
15. MCL Resourcing undertakes properly documented due diligence before appointing agents and other intermediaries.
16. All agreements with agents and intermediaries require the prior approval of senior management.
17. Compensation paid to agents and other intermediaries must be appropriate and justifiable remuneration for legitimate services rendered.
18. Agents and other intermediaries must contractually agree to comply with this policy and are provided with appropriate advice and documentation explaining this obligation.
19. MCL Resourcing contractually requires its agents and other intermediaries to keep proper books and records available for inspection by MCL Resourcing, auditors or investigating authorities.
20. MCL Resourcing monitors the conduct of its agents and other intermediaries and has a right of termination in the event that they pay bribes or act in a manner inconsistent with this policy.
21. With regards to contractors and suppliers, MCL Resourcing conducts its procurement practices in a fair and transparent manner.
22. MCL Resourcing avoids dealing with contractors and suppliers known or reasonably suspected to be paying bribes. MCL Resourcing undertakes due diligence, as appropriate, in evaluating prospective contractors and suppliers to ensure that they have effective anti-bribery policies.
23. MCL Resourcing makes this policy known to contractors and suppliers and requires their acceptance and adherence to this policy.
24. MCL Resourcing monitors significant contractors and suppliers as part of its regular review of relationships with them and has a right of termination in the event that they pay bribes or act in a manner inconsistent with this policy.

25. MCL Resourcing makes it clear that no employee will suffer demotion, penalty, or other adverse consequences for refusing to pay bribes, even if such refusal may result in MCL Resourcing losing business.
26. MCL Resourcing has established and maintains an effective system of internal controls to counter bribery, comprising financial and organisational checks and balances over MCL Resourcing's accounting and record keeping practices and other business processes related to this policy.
27. MCL Resourcing has established feedback mechanisms and other internal processes supporting the continuous improvement of this policy. Senior management of MCL Resourcing monitor the policy and periodically review the policy's suitability, adequacy and effectiveness, and implement improvements as appropriate.



Richard O'Donnell
Managing Director, MCL Resourcing