



## CODE OF CONDUCT POLICY

Profluid Pty Ltd has a Code of Conduct which explains how we:

- Do business
- Work together
- Engage with our community and other stakeholders

Our business has been built upon the values of honesty, integrity and quality relationships with our associates, customers, suppliers, vendors, shareholders, and our community.

Relationships require a strong foundation of mutual trust and understanding that is nurtured day after day. That trust is earned, not just by following the letter of the law, but also by striving to "DO THE RIGHT THING".

Our Code of Conduct is based on these values and contains the fundamental principles of how we expect to conduct business. It makes clear that all associates are expected to understand and appreciate the ethical considerations of their decisions and reaffirms our long-standing commitment to a culture of corporate and individual accountability and responsibility.

From a business perspective, DOING THE RIGHT THING means following our company policies and procedures, speaking up, getting advice, and complying with the law.

This Code of Conduct Policy has been formulated to foster and maintain Employee trust and confidence in the professionalism and the integrity of the Employees of the company; therefore, maintaining and enhancing the reputation of the company. The circumstances of conduct, as set out below, are intended situations which attempt to threaten the conduct and workplace environment of Profluid Pty Ltd. For situations not specifically included in this Code, or in our policies and procedures, we still expect that Profluid Pty Ltd will always act appropriately.

Clauses covered under this policy:

a) Professionalism

The personal and professional behavior of Employees shall confirm to the standards expected of persons in their positions, which includes:

- a. A commitment to and adherence to professional standards in their work and in their interactions with other Employees of the Company.
- b. A commitment to maintaining the highest standards of integrity and honesty in their work.
- c. An adherence to ethical and legal standards to be maintained in business.
- d. A responsibility to support the Company in its efforts to create an open and mutually supportive environment.

Wherever a misunderstanding is thought to have taken place through unclear communications, this should be corrected promptly.

b) Conflict of Interest

Each Employee is expected to avoid situations in which his or her financial or other personal interests or dealings are, or may be, in conflict with the interests of the Company. Accordingly, the Company always expects its Employees to act in the Company's interest.

Employees must not use any Company's property, information or position, or opportunities arising from Code of Conduct for personal gains or to tarnish the image of the Company. All employees must avoid situations in which their personal interest could conflict with the interest of the Company.

c) Confidentiality of Information

As a result of employment with the Company, Employees may be entrusted with confidential information regarding the Company and/or its affiliates, its customers and suppliers. Upon joining, Employees are required to separately read, acknowledge, and sign the 'Confidentiality Agreement', included in the Employees working contract, that shall explicitly mention the terms and conditions of the confidentiality obligation and treatment of confidential information and intellectual property of Profluid Pty Ltd.

d) Bribery, Corruptive Acts

Profluid Pty Ltd complies with Laws and Regulations for its employees to always act according to ethical standards of honesty, integrity, fairness, and respect in all the transaction. Thereby, all intentional acts that may conceal or obscure the true nature of a business transaction are completely restricted.

By this, employees in Profluid Pty Ltd must

- Not give, offer, accept, or request bribes, facilitation payments, secret commissions, or other prohibited payments.
- Not use the company name and/or ABN for personal international shipments.
- Engage in money laundering or cause any of them to be given, offered, accepted, or requested.
- Not approve any offers, or make, accept, or request any irregular payments or other thing of value, to win business or influence a business decision in favor of Profluid Pty Ltd.
- Comply with any reporting and approval processes for gifts, entertainment, or hospitality.
- Obtain required approvals for donations and sponsorship.
- Not offer or receive any gifts, entertainment, or hospitality to or from public or government officials or politicians, without approval from the relevant Anti-bribery Officer.
- Be vigilant and report any breaches of, or suspicious behavior related to, this policy.

A breach of the Policy may result in disciplinary action against the Employee concerned including, potential dismissal or termination of employment or any other legal action available with the Company.

All business stakeholders should come forward if they have any concerns regarding any breach of this Policy and should do so without any fear of reprisal or repercussion.

Our Policy will be made available to any interested party via our website at: <https://profluid.com.au/>

APPROVED: 15 April 2024

REVISION No.: 2

REVIEWED: 25 November 2024

A blue ink signature of Jerome Monteiro, consisting of a stylized, flowing script.

**Jerome Monteiro**  
Managing Director



## EQUAL EMPLOYMENT OPPORTUNITY (EEO), ANTI-DISCRIMINATION AND HARASSMENT POLICY

Profluid Pty Ltd is an Equal Opportunity Employer (EEO) committed to providing a workplace free from discrimination, harassment, and bullying, and upholding relevant statutory laws.

Profluid Pty Ltd will not tolerate any form of discrimination, harassment, sexism, racism, ageism or bullying in the workplace, at work-related functions, whilst travelling for company business, in work-related accommodation or anywhere where there is a connection with the business.

We value cultural diversity and recognize the significance of the many differences in backgrounds, cultures, and demographic characteristics of all personnel, including their family responsibilities. It is integral to the business to foster a fair and equitable working environment whereby all personnel are treated with dignity and respect.

As a responsible community member, Profluid Pty Ltd recruit people from all backgrounds. We believe that our employees from many different cultural, linguistic, and national backgrounds provide us with valuable knowledge to penetrate and relate to our customers both in the local and the international market.

Profluid Pty Ltd is committed to:

- Creating a workplace that promotes equal opportunity.
- Maintaining a workplace where all employees, potential employees and contractors are able to perform their duties free from all forms of discrimination, harassment and bullying.
- Ensuring employment practices, recruitment, selection, and promotion procedures and based on the individual merit of applicants and the inherent requirements of the job.
- Seeking out and retaining the finest human talent to ensure top business growth and performance.
- Providing relevant training and awareness programs for all employees.

Our Responsibilities:

All managers, supervisors, employees, and contractors are responsible for ensuring that they:

- Maintain a high level of professional conduct.
- Treat others with dignity, courtesy, and respect.
- Respect the rights of their colleagues.
- Promote and encourage the achievement of equal opportunity.
- Comply with this Policy, relevant laws, and company standards and processes.
- Participate and assist in resolving any complaints.

Any employee or contractor who believes he or she has experienced a breach of this Policy is encouraged to make a complaint in accordance with this Policy.

Severe or repeated breaches to this policy can lead to formal discipline up to and including dismissal.

Our Policy will be made available to any interested party via our website at: <https://profluid.com.au/>

APPROVED: 27 June 2023

REVISION No.: 1

REVIEWED: 25 November 2024

Jerome Monteiro  
Managing Director

A large, stylized handwritten signature in blue ink, which appears to be "Jerome Monteiro", is written over the printed name and title.



**Profluid Pty Ltd is committed to demonstrating leadership with respect to our environmental management system and taking accountability for the effectiveness of the system.**

The Senior Management Team will also support other relevant management roles to demonstrate their leadership as it applies to their area of responsibility. Senior management will also ensure the integration of the environmental management system into the organisations business processes and promote the use of a process approach and risk-based thinking.

Profluid Pty Ltd aims to:

- Recycle as much of our waste material as possible across the company.
- No environment breaches.
- Maintain an Environmental Management System compliant with ISO14001.
- Ensure sustainability through the effective and efficient use of resources.

Profluid Pty Ltd will achieve this by:

- Protecting the environment including prevention of pollution.
- Minimising pollution from our works by developing work methods that reduce the risk of environmental damage.
- Continuously improve our Environmental Management System to enhance environmental performance.
- Developing environmental objectives and targets and review performance against these objectives and targets.
- Communicating our Environmental Policy to all employees and subcontractors.
- Contributing to energy/ resource saving by offering eco-conscious products and work methods to our clients where possible.
- Reclaiming used materials where appropriate and recycling them where possible.
- Maintaining awareness of environmental-related legislation and regulations and to fulfil our compliance obligations.
- Training our employees and subcontractors on environmental awareness.
- Striving to be a leader in Environmental Management for our industry.

Our Policy will be made available to any interested party via our website at: <https://profluid.com.au/>

**APPROVED:** 29 March 2021

**REVISION No.:** 0

**REVIEWED:** 25 November 2024

A blue ink signature of Jerome Monteiro, consisting of a large, stylized 'J' followed by the name.

**Jerome Monteiro**  
Managing Director

**Profluid Pty Ltd is committed to providing a place of work which minimizes risk arising from lack of fitness for work.**

The management of fitness for work is considered a shared responsibility between an organization and its personnel. Profluid Pty Ltd is responsible for providing a safe system of work, which includes the development, implementation and management of a safe work environment and work practices.

Profluid Pty Ltd has a responsibility to take appropriate action when health, safety, or work performance of individuals in the workplace is impacted by fatigue, stress or alcohol and/or drug use.

Individuals are also responsible for ensuring that they consider their lifestyle and medical factors to ensure they are fit for work and not impaired by fatigue, or under the influence of alcohol or any drugs that may in any way affect their, or other's ability to safely perform their duties or negatively impact on their health and wellbeing.

Profluid Pty Ltd will:

- Educate its employees about the impacts of fatigue and stress.
- Increase awareness about fitness for work, and drug/alcohol consumption.
- Provide appropriate fatigue management training.
- Develop and implement agreed working rosters to ensure adequate opportunity for restorative sleep and work-life capacity is provided.
- Ensure that if a person's capacity to work safely is reduced by fatigue they can notify their supervisor without fear of adverse repercussions.

This Policy applies to all individuals at Profluid Pty Ltd and covers a range of issues that may impact on fitness for work including fatigue, stress, physical wellbeing, medical issues and drugs and alcohol.

Our Policy will be made available to any interested party via our website at: <https://profluid.com.au/>

**APPROVED:** 29 March 2021

**REVISION No.:** 0

**REVIEWED:** 25 November 2024

A blue ink signature of Jerome Monteiro, consisting of a stylized, cursive script.

**Jerome Monteiro**  
Managing Director

**Profluid Pty Ltd recognizes its moral and legal responsibilities and is committed to providing a safe and healthy work environment for employees, contractors, visitors, and the community.**

Profluid Pty Ltd Health and Safety Policies and Procedures are driven not only by our commitment to fulfil statutory and regulatory obligations, but also by the desire to establish and maintain an environment free from workplace injury. Our people are our strength and their safety, both at work and away from work, is of paramount importance to us.

Profluid Pty Ltd aims to:

- Implement a Health and Safety Management System (HSMS) that complies with all requirements of International Standard ISO45001.
- Implement work practices which provide safe and healthy work conditions to prevent the injury and ill health of our workers.
- Become a supplier and service provider of choice by providing healthy and safe work practices.
- Ensure all possible hazards are eliminated and the highest level of control in the hierarchy of control is applied to the remaining risks at all the times.
- Promote our Policy that people should come to work safely, perform their duties, and return home safely.
- Ensure there is always a safe way of doing things.
- Look at ways to learn and improve in our day-to-day undertakings.

Profluid Pty Ltd aims to achieve these objectives by:

- Adhering to legal, customer and other requirements.
- Providing safe plant, equipment, and systems of work.
- Providing employees and contractors with necessary PPE, relevant information, instruction, training, and supervision to ensure their safety.
- Ensuring continual improvement of our management system.
- Consulting with and encouraging participation of our workers.
- Ensuring a hazard risk management approach is taken to occupational safety and health.

Our Policy will be made available to any interested party via our website at: <https://profluid.com.au/>

**APPROVED:** 10 October 2023

**REVISION No.:** 1

**REVIEWED:** 25 November 2024

A blue ink signature of Jerome Monteiro, consisting of a stylized, cursive script.

**Jerome Monteiro**  
Managing Director



**Profluid Pty Ltd is committed to meeting the quality standards expected by our customers, and to the continual improvement of our products and services.**

Profluid Pty Ltd maintains processes and systems appropriate to our area of operations with the objective of providing the framework and platform to:

- Consistently and predictably supply products and services that meet customer needs and expectations in a timely and efficient manner.
- Ensure a consistently high standard of quality is maintained in all endeavours.
- Conform to relevant specifications, statutory and regulatory requirements, supply agreements, contractual requirements.
- Maintain workplaces and environments where continuous improvement in our systems, products and services are embraced.

In meeting these objectives, Profluid Pty Ltd will manage and maintain a quality system based ISO9001:2015, enabling us to:

- Adopt a comprehensive and concise review process that determines the needs of our customer and to work consistently to meet those needs in full and on time.
- Establish appropriate quality objectives, specific performance expectations and targets to ensure we meet our objectives.
- Ensure our personnel are clearly briefed and trained and are provided the appropriate resources necessary to deliver our quality objectives always.
- Perform regular reviews, identify opportunities, and resolve problems expeditiously.
- Continually improve our processes and management systems.

Profluid Pty Ltd commitment to quality is aimed to ensure our workers understand and are competent in their role, demonstrate a relentless commitment to the achievement of our objectives, and to provide quality products and services that consistently and reliably satisfy the needs of our customers.

Our Policy will be made available to any interested party via our website at: <https://profluid.com.au/>

**APPROVED:** 29 March 2021

**REVISION No.:** 0

**REVIEWED:** 25 November 2024



**Jerome Monteiro**  
Managing Director



# COMPANY SERVICE VEHICLE POLICY

## Policy overview.

The Profluid Pty Ltd company service vehicle policy gives employees guidelines for obtaining, qualifying for, and using a company service vehicle. A "company service vehicle" is any vehicle Profluid Pty Ltd authorize the use of by employees.

This policy applies to all employees who use a company service vehicle and applies during working hours.

## Qualifying for the use of a company service vehicle.

Employees may qualify to use a company service vehicle if they need a company vehicle for their daily work.

Employees are only allowed to drive a company service vehicle car if they have an Australian valid driver's license (registered in Profluid system) and a clean driving record.

A clean driving record means the employee has not been held at fault for a car accident or arrested on charges of violating vehicle and traffic laws. Profluid Pty Ltd can assign and revoke access to company service vehicles at its discretion.

## Company service vehicles for the use by employees with disabilities.

Profluid Pty Ltd will make reasonable accommodations to facilitate company vehicle use for eligible employees with disabilities.

## Company service vehicle rules.

- All employees who hold an Australian valid driver's license and a clean driving record are authorized to use the company service vehicles unless otherwise specified.
- Obey traffic laws in your jurisdiction and be courteous towards other drivers.
- Report any damage or problems to your assigned vehicle immediately.
- Report changes to your driver privileges, such as driver's license suspension, immediately.
- Do not drive while intoxicated, fatigued, or on medication that affects your driving ability.
- Do not smoke in any company vehicle.
- Do not lease, sell, or lend a company vehicle.
- Do not use a phone or text while driving.
- Do not allow unauthorized drivers to use a company vehicle unless required by an emergency.
- Always lock company cars.
- Company service vehicles are for professional use only. All journeys must be documented through the vehicle logbook.
- Document driving expenses.

Employees who violate company vehicle rules are subject to disciplinary actions which may include verbal and written warnings, suspension of vehicle privileges, termination, and legal action.

Any cost to clean the vehicle due to mis-use or lack of care, remove smoking odor, stains, or to repair damages will be charged to the user of the vehicle in charge at the time of issue and when notified to Profluid's management.





## COMPANY SERVICE VEHICLE POLICY

### Accidents.

- Contact the Director immediately. They will contact the insurance provider.
- Follow legal guidelines for exchanging information with other drivers and report the accident to local police if required.
- Do not guarantee payment or accept responsibility without company authorization.

### Profluid Pty Ltd responsibilities.

- Ensuring vehicles are safe before assigning them.
- Scheduling regular maintenance.
- Providing car insurance.
- Retiring and replacing cars as needed.
- Nominating a vehicle supervisor.

### Vehicle supervisor responsibilities.

- Monitor gas, tyres pressure, and all fluid levels.
- Bring vehicles to scheduled maintenance appointments.
- Make sure there is no damage to the vehicle each time is used/check vehicle status in and out.
- Make sure the logbook is always up to date.

### What Profluid Pty Ltd is not responsible for.

- Paying fines employees receive while driving company vehicles they are responsible for.
- Paying for specialized cleaning and damages due to lack of care by users
- Making bail for employees who are arrested while driving company cars.

Our Policy will be made available to any interested party via our website at: <https://profluid.com.au/>

APPROVED: 12 July 2023

REVISION No.: 1

REVIEWED: 25 November 2024



**Jerome Monteiro**  
Managing Director

**Profluid Pty Ltd attaches a high priority to understanding, and complying with, Australian export controls and will give priority to complying with all Australian export laws over our commercial interests.**

Export control laws and regulations seek to prevent the misuse of sensitive technology in the interests of national security.

Current legislation regulates the tangible and intangible export from Australia to a place outside Australia of defence and strategic goods, software, and technology listed in the Defence Strategic Goods List (DSGL).

Profluid Pty Ltd is committed to maintaining an effective system of export control compliance that is designed to avoid violations, detect them promptly if they occur, and provide timely responses, including prompt investigations and appropriate remedial actions.

Our leaders shall ensure that all employees in their Business comply with all applicable laws and regulations when importing and exporting products, services and information, and shall act at all times in accordance with export controls laws and regulations.

Profluid will exercise due diligence by taking reasonable precautions to ensure that its staff, and other relevant personnel, are made aware of their obligations under Australian export controls laws and regulations.

All staff and other relevant personnel, are responsible for complying with export control and sanctions laws in the conduct of the work-related activities, and must exercise due diligence when dealing with matters that may fall within the scope of this Policy.

Profluid employees and other relevant personnel, shall not, without a permit or licence from the Department of Defence, undertake the following activities in relation to controlled goods (defence and dual-use goods on the DSGL):

- intangible supply – a person in Australia providing controlled technology in a non-physical form (e.g. electronically) to another person outside Australia;
- tangible supply – the physical export of goods outside Australia;
- publication – in relation to military technology, placing this in the public domain by publishing it on the internet, to the public or to a section of the public; or
- brokering – anyone located in Australia, or an Australian citizen or resident located outside Australia, acting as an agent or intermediary to arrange the transfer of controlled goods or technology between two places located outside Australia, and receiving money or non-cash benefit, or advancing a political, religious or ideological cause for arranging the supply.

Our Policy will be made available to any interested party via our website at: <https://profluid.com.au/>

**APPROVED:** 29 March 2021

**REVISION No.:** 0

**REVIEWED:** 25 November 2024

**Jerome Monteiro**  
Managing Director

A blue ink signature of Jerome Monteiro, consisting of a stylized, flowing script that loops around the text.



Profluid Pty Ltd has developed this Pandemic Safety Plan (also known as a Pandemic Safe Plan) to help all associated personnel to comply with all safety requirements if any pandemic event occurs (example: COVID-19)

This plan provides staff members of the business team guidance on operating in a pandemic-safe way and helps identify and mitigate risks during a pandemic event.

Our business is dedicated to the health, safety and wellbeing of all team members, contractors, and visitors. In a pandemic environment, we acknowledge additional precautions are required and that these are outlined in this Safety Plan.

**1. Access to premises**

*To control the flow of people into and through the premises, we will:*

- Require all personnel upon entering the premises via Reception area to sign in the register.
- Provide access to hand-hygiene products upon entry and exit (and at appropriate locations throughout the practice), such as an alcohol-based hand sanitizer or hand-washing facilities.

**2. Physical distancing of 1.5m**

*Profluid Pty Ltd will put in place physical distancing measure by:*

- Limiting the number of people on the premises at any one time.
- Spacing furniture (office desks) within the premises.
- Encouraging virtual meetings where possible.

**3. Use of personal protective equipment**

*Appropriate use of personal protective equipment (PPE) is critical in limiting the spread of a pandemic. All staff will:*

- Ensure standard precautions, including hand hygiene, cough etiquette and appropriate waste-management techniques, are maintained.
- Wear PPE appropriate (gloves and face mask) as per advice from the Department of Health.

**4. Environment management and cleaning**

*Our office will regularly clean and disinfect shared spaces, surfaces, and communal areas/items. Our office will:*

- Enhance air flow by opening windows and doors in shared spaces (where and when appropriate) and optimising fresh air flow in air conditioning systems (by maximising the intake of outside air and reducing or avoiding recirculation of air).
- Minimise the sharing of administrative equipment between team members.
- Adhere to strict environmental cleaning as per the most current advice from the Department of Health's or our local public health unit.
- Clean and disinfect frequently touched surfaces with detergent and disinfectant wipe/solution.
- Make sure all food contact surfaces are effectively and frequently cleaned.
- Work stations are frequently cleaned and food/drinks are disposed accordingly.

**5. Record -keeping**

*To aid contact tracing in the event a visitor or contractor tests positive for any diseases (example Covid-19) , our office will:*

- Maintain a sign in register, including date visited and entry and exit times.

**6. Practice team management and limit interactions in closed spaces**

*To reduce the risk of transmission between team members, we will:*

- Regularly communicate with all team members regarding the requirement to not attend the premises if they have any symptoms consistent with any diseases (example Covid-19), regardless of how mild, and will encourage testing in line with local public health unit advice.
- Check the temperature of each practice team member on commencement of work. Where the person registers a temperature >37.5°C they will not enter the practice and will be asked to seek further medical review when required by the Department of Health.
- Require a verbal/written/electronic attestation from each team member at the commencement of each shift confirming they do not have any symptoms consistent with any diseases (example Covid-19), have not been in contact with a confirmed case, and have not been directed to isolate.
- Support any team member who tests positive or is identified as a close contact or is required to self-isolate – including by making them aware of their leave entitlements.
- Where a team member typically works across a number of sites within the business, minimise movement between sites by scheduling shifts at one location (where possible)
- Encourage physical distancing in common areas (i.e., tearoom), through organisation of furniture, and signage.
- Encourage tea breaks/lunchbreaks to be taken outside.
- Stagger breaks to limit the number of people in common areas.
- Encourage all team members to provide their own drinking vessels and cutlery.
- Require all team members to thoroughly clean communal items (e.g., cutlery) immediately after use by washing with hot water and detergent or by placing them in the dishwasher to be washed on the hottest possible setting.

**7. Responding to a positive case, or close contact**

*If a staff member tests positive to any diseases (example Covid-19), our office will:*

- Contact the local public health unit and follow their advice.
- Follow the direction of the local public health unit regarding cleaning of the premises.
- Ensure the team member does not return to the practice until they meet the criteria for release from isolation, and as instructed by the local public health unit.
- Assist the local public health unit in contact tracing by providing records of all visitors and team members who have attended the premises during the period in which the team member was potentially infectious (as defined by the local public health unit).

This plan will be reviewed regularly to ensure it reflects the current processes and procedures, as well as current legislation requirements and public health directives.

Our Policy will be made available to any interested party via our website at: <https://profluid.com.au/>

APPROVED: 25 November 2024

REVISION No.: 1

REVIEWED: 25 November 2024



**Jerome Monteiro**  
Managing Director



Profluid Pty Ltd ICST Policy sets out the standard of behaviour expected of employees when using ICST services and outlines appropriate behaviour when referring to the company or where employees are identifiable as being associated with the company on external sites. This Policy must be used in conjunction with the Security Policy (DISP).

Profluid Pty Ltd is committed to:

- To comply with the following four requirements of the ASD Essential 8: application whitelisting, patch applications, restrict administrative privileges, and patch operating systems.
- Professional, ethical, and responsible use of ICT at all locations including client premises and afterhours use.
- Providing a safe workplace for management, staff, contractors, and others using the company's ICT facilities.
- Safeguarding the privacy and confidentiality of information received, transmitted, or stored electronically.
- Ensuring that the use of the company's ICT facilities complies with all policies and relevant government legislation.
- Maintaining a Security Register (SR).
- Accountable in ensuring an appropriate system of risk, oversight and management is maintained.
- Ensure any sensitive and classified materials entrusted to Profluid Pty Ltd are safeguarded at all times.
- Facilitating annual security awareness training of personnel.
- Reporting security incidents and fraud incidents, and contact reports.
- Providing management, staff, contractors and others with online information, resources, and communication tools to support the effective operation of the service.

This Policy applies to all aspects of the use of ICT including, but not limited to:

- Internet usage.
- Electronic mail (email).
- Electronic bulletins/ notice boards/ discussion/ news groups.
- Weblogs (blogs)/ social networking/ chat boards.
- File transfer, file sharing and file storage including the use of end-point data storage devices (devices capable of storing information/ data i.e., USB sticks, hard drives, laptops etc.).
- Video conferencing.
- Streaming media.
- Instant messaging.
- Portable communication devices including mobile and cordless phones.

Official information:

- Any Defence related official information is classified in accordance with the Australian Government Security Classification System (AGSCS) and protected in a manner that prevents unauthorized access by or disclosure to, those who do not have a need-to-know and the appropriate security clearance.
- Profluid Pty Ltd personnel using classified material are to ensure that there is no deliberate or casual inspection or oversight by unauthorized persons. All classified material is to be secured in an approved security container when not in actual use or under direct supervision of an appropriately cleared person with a need-to-know.
- A protective marking assigned to official information indicates the consequence of unauthorized disclosure. It identifies the level of protection that must be provided during use.

All personnel and users must comply with all requirements of this Policy. All personnel must be aware of their responsibilities in the protection of information and assets. Any breach of this Policy, within or outside of working hours, may result in disciplinary action which may include termination of employment. Other action that may be taken by the company include, but are not limited to, issuing a warning, suspension, or disconnection of access to all or part of the company's computer network, whether permanently or on a temporary basis.

Our Policy will be made available to any interested party via our website at: <https://profluid.com.au/>

**APPROVED:** 29 March 2021

**REVISION No.:** 0

**REVIEWED:** 25 November 2024

**Jerome Monteiro**  
Managing Director

***Profluid Pty Ltd.'s Laboratory is committed to continual improvement of processes and services to achieve ongoing customer satisfaction. It is therefore our policy to:***

- Consistently provide quality testing services that conform to customer and regulatory requirements.
- Ensure that all personnel are competent and qualified for the tasks they perform, and that all personnel familiarize themselves with quality system documentation to implement the policies and procedures in their work. professionally and effectively perform testing services to produce accurate and precise results.
- Consistently comply with ISO/IEC 17025 to ensure quality testing services, and to continually improve the effectiveness of the Quality Management System. It is Profluid's Pty Ltd.'s goal to encourage active participation of all employees in quality planning and continual improvement efforts to meet all quality and service.
- Complying with all legal and other requirements that apply to the organization's operations related to its environmental aspects.

**APPROVED:** 23 September 2021

**REVISION No.:** 0

**REVIEWED:** 25 November 2024



**Jerome Monteiro**  
Managing Director

Drug and alcohol use can affect a person's ability to work safely. It creates a risk to workers and work health and safety.

Profluid Pty Ltd is committed to a safe, healthy, and productive workplace, and is focused on eliminating risks associated with the adverse effects of alcohol and drug use. In accordance with this commitment employees should not be impaired by Alcohol and/or Other Drugs when at work. All Employees should be in a fit condition to perform their duties without compromising the safety of themselves, their colleagues, and members of the community.

### POLICY OBJECTIVES:

- Ensure Employees are fit for work and carry out their duties in a safe manner unimpaired by drugs or alcohol.
- Assist Employees at all levels in understanding how the use (and/or abuse) of these substances can impact health, safety and work performance of individuals and their colleagues.

### POLICY PRINCIPLES:

- Employees must not be under the influence of alcohol and/or illegal drugs when at work.
- Employees must not possess, distribute, sell, or consume illegal drugs in the workplace or on premises, including lunchrooms and car parks.
- Employees must not consume alcohol while at work or on premises, including lunchrooms and car parks.
- Employees using prescription drugs for medical treatment must consult with their supervisor/manager.
- Employees who suspect a colleague is unfit for work because of alcohol or drug use should immediately raise these concerns with their manager, so that assistance can be provided.
- When an employee is suspected by a supervisor/manager to be unfit for work/impaired because of alcohol or drug use or had an incident in the workplace they should be tested in accordance with this Policy.
- Workshop personnel performing high risk activities may be tested regularly in accordance with this Policy.

### TESTING PROCEDURES:

- Testing may be undertaken for the following reasons: workshop staff pre-employment, workshop staff health monitoring, reasonable suspicion, and incidents.
- Employee subject to alcohol/drug testing will be asked to go to a designed testing facility and directed to provide urine specimens and/or to conduct breath/blood/ saliva test for alcohol detection.
- Collected specimens will be sent to a federally certified laboratory and tested for evidence of AMPHETAMINE TYPE SUBSTANCES, BENZODIAZEPINE CLASS, CANNABINOIDS, COCAINE/METABOLITE, METHADONE METABOLITE (EDDP) and OPIATE CLASS.

### CONSEQUENCES:

- Applicants who refuse to cooperate in an alcohol and drug test will not be hired.



- Employees who refuse to cooperate in required tests will be terminated.
- Employees who violate this policy by consuming/selling/being in possession or under the influence of alcohol or drugs while in the workplace will be terminated.
- Employees who have tested positive to drugs and alcohol will be subjected to disciplinary action, up to and including termination, depending on their job position and the type/quantity of drug/alcohol detected. In the case that termination is not appropriate, the Director will provide them with a formal written warning, which will state further disciplinary measures if the policy is breached again.

**CONFIDENTIALITY**

Information and records relating to positive test results, drug and alcohol dependencies, and legitimate medical explanations will be kept confidential to the extent required by law and maintained in secure files separate from normal personnel files. Such records and information may be disclosed among managers and supervisors on a need-to-know basis and may also be disclosed when relevant to a grievance, charge, claim or other legal proceeding initiated by or on behalf of an employee or applicant.

This Policy applies to all Profluid Pty Ltd Employees (including interns and apprentices), contractors, agency staff, and students on work -placement. This policy is not limited to the workplace or work hours and extends to work-related functions and events.

Our Policy will be made available to any interested party via our website at: <https://profluid.com.au/>

**APPROVED:** 26 June 2023

**REVISION No.:** 0

**REVIEWED:** 25 November 2024



**Jerome Monteiro**  
Managing Director