



Standard

Code of Conduct

Endorsed: 23 June 2017

Brief description

Gladstone Ports Corporation (GPC) is committed to creating and maintaining an environment for customers, visitors and employees which is professional, customer responsive, safe and free from any form of unlawful or inappropriate behaviour.

This Standard has been developed to enable our people's understanding of the minimum standard of behaviour required in order to achieve this commitment.

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Terms and definitions

The following key terms and definitions apply to this Standard:

Term	Definition	Source ¹
A close personal relationship	A close personal relationship is any relationship you have with a person that could give rise to a perception of favouritism or bias if you were to be involved in a decision relating to that person. The types of relationships that can fall within the scope of this obligation are wide and varied.	
Conduct	Includes any act or omission.	Crime and Corruption Act 2001 (CC Act 2001 (Qld))
Conflict of interest	A conflict of interest involves a conflict between an employee's duties and responsibilities and the employee's private interests. A conflict of interest can arise from avoiding personal losses as well as gaining personal advantage – whether financial or otherwise.	
Consultant	A person not employed by GPC who provides professional or expert advice under an arrangement with GPC.	
Contractor	A person not employed by GPC who has a contract to provide services to GPC.	
Custodian	Accountable for monitoring the application of the system and advising the owner of the monitoring outcomes.	



Term	Definition	Source ¹
Corrupt conduct	<p>means conduct of a person, regardless of whether the person holds or held an appointment, that:</p> <ul style="list-style-type: none"> a adversely affects, or could adversely affect, directly or indirectly, the performance of functions or the exercise of powers of – <ul style="list-style-type: none"> i a unit of public administration; or ii a person holding an appointment; and b results, or could result, directly or indirectly, in the performance of functions or the exercise of powers mentioned in paragraph (a), in a way that – <ul style="list-style-type: none"> i is not honest or is not impartial; or ii involves a breach of the trust placed in a person holding an appointment either knowingly or recklessly; or iii involves a misuse of information or material acquired in or in connection with the performance of functions or the exercise of powers of a person holding an appointment; and c is engaged in for the purpose of providing a benefit to the person or another person or causing a detriment to another person; and d would, if proved, be – <ul style="list-style-type: none"> i a criminal offence; or ii a disciplinary breach providing reasonable grounds for terminating the person's services, if the person is or were the holder of an appointment. 	CC Act 2001 (Qld)
Crime and Corruption Commission (CCC)	Means the Crime and Corruption Commission (CCC) established under the Crime and Corruption Act 2001 (Qld), which must be informed of any allegation of corrupt conduct made in relation to an employee.	
Detriment	<p>Includes:</p> <ul style="list-style-type: none"> a personal injury or prejudice to safety; b property damage or loss; c intimidation or harassment; d adverse discrimination, disadvantage or adverse treatment about career, profession, employment, trade or business; e financial loss; or f damage to reputation. 	Public Interest Disclosure Act 2010 (Qld) (PID Act 2010 (Qld))
Electronic communication system	Includes but not limited to, computers, computer networks, internet, intranet, telephones, mobile phones, emails, blackberries, faxes, radio networks and any other communications device or service provided by GPC.	
Employee	Any person appointed by GPC to a position on a permanent, temporary, fixed term or casual basis, or an apprentice, trainee or vacation student.	
Equal Employment Opportunity	<p>Means employees:</p> <ul style="list-style-type: none"> a Appointed or engaged under a contract of service, whether on full-time, part-time, permanent, casual or temporary basis or under statutory appointment; and b Are treated on merit at every stage of employment, from recruitment and selection processes, appointment, promotion, transfer, redeployment, training and development, terms and conditions of service, separation or any other matter relating to the employment of employees. c It also means to enable EEO target groups to compete for recruitment, selection, promotion, transfer and pursue careers as effectively as people who are not members of these groups. 	Pursuant to Section 148 of the Government Owned Corporations Act 1993 and adapted from Public Service Act 2008 (Qld)



Term	Definition	Source ¹
Gifts or benefits	Includes but not limited to: conference/seminar costs, gratuity, remuneration, allowance, discount, fee, subsidy, hospitality, travel, entertainment, alcohol, raffle tickets, scratch card, lotto/casket tickets, books, equipment, goods or other services received.	
GPC Resources	GPC resources include property, plant and equipment, vehicles, information systems, computing resources, goods, products and valuables.	
Leader	Any person directly accountable for the supervision/management of GPC employees in the workplace.	
Our people	Members of the GPC Board of Directors, employees (includes team members and leaders), contractors, and consultants, and everyone who does work for GPC, while they are doing work for GPC.	
Owner	Accountable for approval and authorised discretion to implement or significantly change the system	
Public Interest Disclosure (PID)	Means the disclosure by an employee of 'reasonable suspicion' about: <ul style="list-style-type: none"> a The conduct of another employee that could, if proved, be corrupt conduct; or b The conduct of another employee that could, if proved, be a reprisal that relates to a previous disclosure made by the employee to GPC. 	PID Act 2010 (Qld)
Public Interest Disclosure (PID) Officer	Means the Company Secretary acting in the capacity of Public Interest Disclosure Officer.	
Racial hatred	An act, done otherwise than in private, if: <ul style="list-style-type: none"> a the act is reasonably likely, in all the circumstances, to offend, insult, humiliate or intimidate another person or a group of people; and b the act is done because of the race, colour or national or ethnic origin of the other person or of some or all of the people in the group. 	Racial Discrimination Act 1975 (Cth)
Reasonable suspicion	For a suspicion to be 'reasonable', there needs to be more than bare or idle speculation. In essence, there must be some evidence sufficient for a reasonable person to suspect corrupt conduct. For example, the available facts, evidence or other information must suggest that the allegation, if proven, would amount to corrupt conduct. This 'reasonable suspicion' is the trigger point for how a suspected corrupt conduct matter is to be dealt with by GPC pursuant to section 38 of the CC Act 2001 (Qld).	Adapted from section 38 of the CC Act 2001 (Qld)
Reprisal	Means causing, attempting, or conspiring to cause detriment to another person because, or in the belief that: <ul style="list-style-type: none"> a the other person or someone else has made or intends to make a PID; or b the other person or someone else is, has been, or intends to be, involved in a proceeding under the PID Act 2010 against any person. 	Adapted from the PID Act 2010 (Qld)



Term	Definition	Source ¹
Sexual harassment	Sexual harassment happens if a person: <ul style="list-style-type: none"> a subjects another person to an unsolicited act of physical intimacy; or b makes an unsolicited demand or request (whether directly or by implication) for sexual favours from the other person; or c makes a remark with sexual connotations relating to the other person; or d engages in any other unwelcome conduct of a sexual nature in relation to the other person; and the person engaging in the conduct described in paragraphs (a), (b), (c), or (d) does so: <ul style="list-style-type: none"> e with the intention of offending, humiliating or intimidating the other person; or f in circumstances where a reasonable person would have anticipated the possibility that the other person would be offended, humiliated or intimidated by the conduct. 	Anti-Discrimination Act 1991 (Qld)
Token nature	Gifts, benefit and hospitality being less than an accumulated total of \$150 within a financial year.	
Unacceptable behaviour	Means behaviour that is in breach of the Code of Conduct and the employee's contract of employment. Some examples of unacceptable behaviour, but not limited to: <ul style="list-style-type: none"> a non-compliance with workplace policies, rules or procedures; b unacceptable behaviour in the workplace; c disruptive or negative behaviour that impacts on co-workers. 	Fair Work Australia Fair Work Act 2009 (Cth) Fair Work Regulations 2009 (Cth)
Unsatisfactory performance	Refers to significant and/or ongoing difficulties with performance which requires immediate resolution. Some examples of underperformance or poor performance, but not limited to: <ul style="list-style-type: none"> a unsatisfactory work performance, that is, a failure to perform the duties of the position or to perform them to the standard required; b non-compliance with workplace policies, rules or procedures, 	Fair Work Australia Fair Work Act 2009 (Cth) Fair Work Regulations 2009 (Cth)
Unlawful discrimination	Occurs when a person with an attribute specified under anti-discrimination or human rights legislation is treated or proposed to be treated less favourably than a person without that attribute in the same or similar circumstance, on prohibited grounds.	Adapted from the Human Rights and Equal Opportunity Commission Website
Victimisation	Means doing an act or threatening to do an act to the detriment of a person who has made or intends to make a complaint, or a person who is a witness to a complaint.	Adapted from the Anti-Discrimination Act 1991 (Qld)
Vilification	A public act, inciting hatred towards, serious contempt for, or severe ridicule of, a person or group of persons on the ground of the race, religion, sexuality or gender identity of the person or members of the group.	Anti-Discrimination Act 1991 (Qld)



Term	Definition	Source ¹
Workplace harassment	<p>Means a person is subjected to repeated behaviour, other than behaviour amounting to sexual harassment, by a person, including the person's employer or a co-worker or group of co-workers of the person that:</p> <ul style="list-style-type: none">a is unwelcome and unsolicited;b the person considers to be offensive intimidating, humiliating or threatening;c a reasonable person would consider to be offensive, humiliating, intimidating or threatening. <p>'Workplace bullying and harassment' does not include reasonable management action taken in a reasonable way by the person's employer in connection with the person's employment.</p>	Prevention of Workplace Harassment Code of Practice 2004, Workplace Health and Safety Queensland
Workplace violence	<p>Means any incident where an employee is physically attacked or threatened in the work environment by a co-worker, including a supervisor, manager or employee.</p> <p>Within this definition:</p> <p>Threat means a statement (verbal) or behaviour that causes a reasonable person to believe they are in danger of being physically attacked.</p> <p>Physical attack means the direct or indirect application of force by a person to the body of, or to clothing or equipment worn by, another person where that application creates a risk to health and safety.</p>	Workplace Health and Safety Queensland Website

¹ where left blank, Source is not applicable



1. Introduction

1.1 Standard purpose

The high level of public accountability which applies to Government Owned Corporations (GOCs) as a result of their public ownership requires the establishment and implementation of good corporate governance principles. GOCs must be properly managed on behalf of their ultimate owners, the people of Queensland.

The public has an expectation that the conduct or perceived conduct of the GPC Board of Directors, Chief Executive Officer (CEO), General Management Team and employees adheres to the highest ethical and moral standards.

The Code of Conduct provides a common understanding at the company level of expected behaviour and provides a framework for dealing with situations that are or may be perceived as unacceptable by shareholding Ministers' and the public.

GPC supports its employees and recognises the value that each person brings, not just to our Corporation but also to the wider community in which we live and operate.

The benefits of implementing this Standard are:

- 1 To provide clarity and direction to employees of expected behaviour.
- 2 To enhance GPC's position as a preferred employer.
- 3 To achieve GPC's vision and mission, in alignment with our Corporation Values.

The risks being managed by this Standard are:

- 1 Corrupt conduct, unacceptable behaviour and unsatisfactory performance in relation to the Code of Conduct.
- 2 Damage to GPC's integrity and reputation.
- 3 Breaches of legislation and legal liability.
- 4 Ineffective management of employees and resources of the GPC.

This Standard supports the Corporate Governance Guidelines for Government Owned Corporations.

1.2 Standard scope

This Standard contributes positively to the culture of the GPC by outlining the minimum standards of behaviour expected of all GPC employees and representatives. This Code of Conduct amended from time to time, forms part of an employee's employment contract with GPC. Employees are responsible for their actions and/or any failure to take action.

This Standard applies to:

- 1 Every member of the GPC Board of Directors.
- 2 The Chief Executive Officer (CEO).
- 3 Every member of the General Management Team.
- 4 Every GPC employee (whether permanent, temporary or casual).

In addition, the standard will apply in the relevant areas to all visitors and contractors and consultants who are working on GPC sites and/or interacting with GPC employees.

1.3 Standard objectives

GPC is committed to creating and maintaining an environment for customers, visitors and employees which is professional, customer responsive, safe and free from any form of unlawful or inappropriate behaviour. This commitment supports the expectations of the people of Queensland that all activities of GPC are conducted with efficiency, impartiality and integrity.

All employees have an obligation to ensure their personal conduct and behaviour is at all times professional and lawful and does not reflect adversely on the reputation of GPC.



All employees of GPC are required to perform their duties to a high standard and demonstrate impartiality and integrity in fulfilling their responsibilities. Employees are to avoid any real or perceived conflict of interest between their private activities and their official duties.

Some of the obligations of employees in relation to workplace ethics, conduct and behaviour are the subject of specific provisions of various Acts and Regulations, e.g. the Public Service Act 2008 Chapter 2, Anti-Discrimination Act 1991 (Qld), the Work Health and Safety Act 2011 (Qld). The minimum standard of behaviour is depicted through the following guiding principles:

- 1 Respect for people.
- 2 Integrity and impartiality.
- 3 Accountability and transparency.
- 4 Promoting a positive public image.

The primary objective of this Standard is to set the *minimum standard* of behaviour required by GPC, aligned to the aforementioned guiding principles.

2. GPC Code of Conduct Standard

2.1 Leader requirements

It is recognised that the behaviour of our leaders sets the tone for the conduct of others. Leaders have the ability to influence others by fostering the desired standards of behaviour in our workplace. Therefore, in addition to their responsibilities as employees set out in section 2, leaders shall:

- 1 Lead by example by observing the Code of Conduct.
- 2 Inform employees of the Code of Conduct.
- 3 Assist employees to understand the Code of Conduct.
- 4 Manage any breaches of this Code of Conduct.
- 5 Ensure employees can access current policies, standards, specifications and related documents including business instructions and are advised of relevant changes.
- 6 Communicate employment requirements to employees, including position duties and expected performance outcomes.
- 7 Ensure that safe and environmentally sound systems of work are in place and that employees hold the mandatory qualifications and/or have received the necessary training to perform required tasks.

2.2 Respect for people

We value people by treating them with respect and making decisions objectively and with proper regard for rights and obligations. This principle promotes openness, teamwork, and trust. We promote an inclusive culture based on diverse backgrounds, experience and views. GPC is committed to creating a workplace that is free from bullying, harassment and discrimination where people are respected and diversity is embraced.

2.2.1 Be respectful and objective

- 1 Treat other employees, customers, stakeholders and members of the public with courtesy, respect and dignity.
- 2 Ensure all interactions are professional, regardless of relationships, so as to not interfere with the undertaking of your duties.
- 3 Do not engage in fighting or any form of physical or verbal aggression.
- 4 Make decisions, advise and behave in a manner that is free from favouritism, self-interest and bias.



2.2.2 Value equity and diversity

- 1 Ensure our workplace is free from workplace harassment, sexual harassment, workplace violence, unlawful discrimination, vilification, racial hatred and victimisation.
- 2 Observe the right of others to be treated fairly, to recognise and demonstrate individual differences, and to be treated impartially.
- 3 Be sensitive to the numerous cultural backgrounds, lifestyle and diversity of others in the workplace.

All behaviours shall be in accordance with the Equity, Diversity, Harassment and Discrimination Standard (Doc # 87582).

2.2.3 Contribute positively to the team

- 1 Work cooperatively and value the contribution of others.
- 2 Ensure that your interactions with others are inclusive.
- 3 Work constructively and with goodwill to resolve any professional and personal differences and tensions.
- 4 Actively participate in all relevant work activities to enable team success.

2.3 Integrity and impartiality

Recognising that employment at GPC involves a public trust, it is a requirement that our people seek to promote public confidence in the integrity of the service we provide for our customers. We demonstrate integrity and impartiality by using our authority and position in a manner so that our official actions are not tainted by conflict of interest or corruption.

2.3.1 Avoid any conflict of interest

- 1 Ensure your official powers, position, resources or influence are not used improperly or for personal or private advantage.
- 2 Disclose immediately any actual, perceived or potential conflict of interest that could be seen as adversely influencing the performance of your duties.
- 3 Disclose immediately where you become aware that you are in a position to influence the appointment, advancement or reward of a person to whom you are married, closely related or have a close personal relationship.
- 4 Advise prior to undertaking any paid work outside GPC which may lead to a conflict of interest with your GPC duties. This includes outside employment that could adversely affect GPC's reputation, time or resources.

Conflicts of interest disclosures are to be made directly to your leader who will determine the extent of any conflict of interest and the action required to resolve the conflict, in accordance with the Reporting Conflicts of Interest Procedure (Doc # 174070).

2.3.2 Honesty

Our people must display honesty at all times. There is zero tolerance of corrupt conduct, such as dishonesty, fraud, theft and misuse of information of any kind.

Examples of dishonesty, fraud, theft and misuse of information include, but are not limited to:

- 1 Theft of cash, plant, consumables or equipment;
- 2 False or misleading timesheets (dishonestly claiming payment for time not worked, i.e. timesheet hours (toil, etc.) not aligning with hours actually worked, claiming for unrostered overtime not actually worked);
- 3 False or misleading expense reimbursement or benefit claims (dishonestly claiming a business expense, reimbursement or benefit);
- 4 False invoicing (dishonestly providing invoices for goods or services not supplied in accordance with the description in the invoice);
- 5 False accounting (dishonestly allowing the reporting of incorrect or misleading financial results).



2.3.3 Disclose gifts and benefits

Gifts or benefits in connection with duties other than proper remuneration will not be requested or encouraged. Under no circumstances should gifts of cash be accepted. Our people will:

- 1 Generally not accept gifts and benefits other than of a token nature, provided it is unlikely to be seen as compromising the recipient or GPC, or create an obligation to the giver.
- 2 Ensure gifts and benefits of a non-token nature are reported and assessed as soon as practicable.
- 3 Report non token gifts and benefits to the Company Secretary within 14 days of the gift or benefit being received.
- 4 Treat each gift and benefit as reportable if in receipt of more than one (1) gift or benefit from the same donor in a financial year, and the cumulative market value exceeds the token gift threshold.

If uncertain about your obligations regarding a gift or benefit offered, disclosure of such is to be made directly to your leader who will determine whether the benefit shall be accepted and the relevant reporting requirement, in accordance with the Reporting Gifts and Benefits Procedure (Doc # 123595).

2.3.4 Maintain and protect confidential information

In performing your duties, you may have access to confidential GPC information that is not publicly available, and may be commercially sensitive or personal information.

- 1 Ensure confidential information is at all times kept confidential, secure and appropriately stored.
- 2 Use sensitive, confidential information (particularly financial and commercial information) only for GPC work purposes and refuse to divulge information if you have reason to suspect that it will be used for improper purposes; or the improper use of which could hurt, damage or hinder GPC's commercial operations.
- 3 Disclose official information only where it is lawful to do so and when authorised by the CEO or other authorised Senior Executive.
- 4 Maintain privacy of personal information collected and held by GPC. Personal information relating to customers or individual employees shall not be provided (unless permitted by law) to other employees unless required to perform their jobs.
- 5 Personal information relating to employment records, salaries, addresses etc. shall not be released to other employees or external parties unless required by law or upon the informed consent of the relevant employee.
- 6 Do not store or transmit confidential information outside the GPC network/system without authority.
- 7 Refrain from using confidential information or information held in official records to gain any personal advantage.
- 8 Ensure intellectual property invented or created in the course of employment with GPC remains the property of GPC.
- 9 Maintain confidentiality of information upon leaving GPC. GPC has the right to take legal action against former employees in instances where they disclose confidential information.

Our people may as a result of the tasks they perform, or their association with GPC obtain price-sensitive information relating to other companies which is not generally available in the market. This price-sensitive information shall not be used in deciding whether or not to acquire or sell shares or other securities. In addition, such information shall not be disclosed to any third party who is likely to use it in deciding whether or not to acquire or sell shares or other securities.

Where there is a reasonable risk that any proposed trading in shares or securities may give rise to a perception of a misuse of information or conflict of interest, the proposed trading shall be disclosed and will be subject to the approval of the Board of Directors in respect to any Director or the CEO, or the CEO in respect to any employee of GPC.



2.4 Accountability and transparency

As a GOC we operate within a framework of mutual obligation and shared responsibility to achieve high standards of public administration and to perform our duties to the best of our abilities. This principle is about performing 'a fair day's work' and demonstrating proper diligence, care and attention when undertaking our duties.

2.4.1 Be responsible for safety, security and the environment

Safety, security and sound environmental practices are the responsibility of all our people. Our people have a duty to minimise the potential of accidents, injuries and ill health, and the impact of operations on the environment.

- 1 Observe all rules, procedures and approved methods of work.
- 2 Report all environmental incidents and complaints promptly.
- 3 Report all unsafe work practices or conditions and workplace injuries promptly.
- 4 Wear Personal Protective Equipment / clothing in accordance with GPC safety requirements.
- 5 Observe all local security procedures such as procedures for entry to GPC premises.
- 6 Assess environmental and safety risks when planning and undertaking work (PORT assessments).
- 7 Report to work in a fit and ready state to perform your duties.
 - a Ensure your personal use of alcohol and drugs or other substances does not affect your ability to safely and effectively carry out your duties in accordance with the [Drug & Alcohol Standard \(Doc # 106901\)](#).
 - b Advise your leader of any personal condition or situation which impacts your ability to do your job in a safe and effective manner.

All employees, contractors or visitors to a GPC site are subject to drug and alcohol testing in accordance with [GPC's Drug & Alcohol Testing Procedure \(Doc # 163222\)](#).

2.4.2 Be diligent when undertaking your duties

- 1 Exercise due and reasonable care and diligence in performing your duties.
- 2 Ensure you are familiar and compliant with relevant GPC policies, standards, specifications and related documents including business instructions that impact on your work.
- 3 Comply with all reasonable and lawful work instructions and directions concerning the performance of your duties.
- 4 While at work be available to provide the full range of prescribed duties required.
- 5 Ensure that hours not worked are not claimed for payment and all overtime is appropriately authorised.
- 6 Ensure appropriate notification and authorisation for absences from the workplace.
- 7 Maintain your knowledge and skills relevant to your position and look for ways to improve performance and achieve high standards within your role.
- 8 Actively participate in people performance processes including probation, induction, performance planning and review, and capability development.

2.4.3 Use GPC resources appropriately

- 1 Utilise GPC resources for work purposes safely, responsibly and for the purpose for which they are intended. Limited personal use may be allowed where specified in relevant policy documents or with the appropriate approval.
- 2 Ensure physical items are secured against loss, vandalism and theft and are properly stored, maintained and repaired.
- 3 Ensure discretionary expenditure and disposal of surplus assets is in accordance with the [Schedule for Expenditure, Disposal and other Authorisation Limits \(Doc # 131970\)](#).
- 4 Avoid waste or extravagance and report any suspected waste to your leader.



- 5 Ensure you have the necessary qualification, licence, permit or accreditation if applicable to use the resource.
- 6 Comply with any record keeping requirements associated with the resource (e.g. log book, user identification).
- 7 Comply with GPC's requirements surrounding the use of GPC electronic communication systems to create, send, access or store any form of information in accordance with the Acceptable Email Usage Specification (Doc # 90188) and Acceptable Internet Usage Specification (Doc # 90191).

2.5 Promoting a positive public image

As a GOC we are entrusted to deliver a high standard of service to customers, on behalf of the government and for the people of Queensland. All of our business undertakings are to be commercially responsible, preserve a professional corporate image and shall stand the test of any public scrutiny.

We work to protect the reputation of GPC and do not engage in any activities that would bring GPC into disrepute. This principle is about recognising that GPC is the mechanism through which employees deliver services to our customers for the benefit of the people of Queensland and accordingly we are all required to promote a positive public image.

2.5.1 Provide a high standard of customer service

- 1 Provide relevant and responsive service to our clients and customers, providing all the necessary and appropriate assistance in accordance with agreed service standards.
- 2 Treat complaints from customers and the community seriously and respond to constructive feedback as an opportunity for improvement.
- 3 Provide our customers with information appropriate to their enquiry and provide appropriate assistance in undertaking follow-up action.

2.5.2 Ensure dress and appearance are appropriate

- 1 To create a positive public image, our people shall maintain a clean and tidy appearance whilst on duty and wear the full, current uniform where it is required.
- 2 Any circumstances that restrict a person's ability to wear the full uniform will where possible be accommodated (e.g. pregnancy, medical and cultural circumstances).
- 3 Ensure that what you wear to work is suitable for your duties and work environment.
- 4 Ensure that your personal hygiene does not affect the comfort of others.
- 5 Ensure that when you wear a GPC uniform or any clothing which can identify you as a GPC employee, that both during and outside of work hours you do not engage in conduct adversely affecting GPC.

2.5.3 Ensure appropriate representation of GPC

- 1 Ensure that whilst representing GPC and/or identifiable as a GPC employee that you do not engage in conduct that adversely affects GPC.
- 2 Ensure appropriate use of social media sites in accordance with the Personal Use of Social Media Sites Specification (Doc # 772832).
- 3 Seek appropriate authorisation to attend events as a GPC representative even in circumstances where you have explicitly been extended an invitation.
- 4 Refrain from making any comment in any forum or to the media about the activities or business of GPC, unless you are specifically authorised to do so.
- 5 Exercise particular care that your personal opinions are not interpreted as being attributable to GPC.
- 6 Refrain from making any public comment that adversely affects GPC's reputation or the exercise of its functions and responsibilities.



2.6 Breaches of the Code of Conduct

This Standard clearly describes appropriate lawful and ethical standards of conduct expected of our people. All employees of GPC are required to be familiar with the Code of Conduct and ensure they observe the expected standards of conduct at all times. Leaders have an obligation to manage breaches of this Standard as soon as practicable after a breach is observed or reported.

Breaches of this Standard will be treated as a serious matter and may have serious consequences regardless of whether the breach is unacceptable behaviour or corrupt conduct. If any employee has breached this Standard they may be subject to disciplinary action, up to and including termination of employment. Consultants and contractors who breach this Standard may have their contracts with GPC terminated.

Where the breach is unlawful it may lead to criminal prosecution (where applicable) and/or civil action (where applicable). In addition, our people must comply with legislative and/or policy obligations to report employee criminal charges or convictions that may impact on their ability to perform their role.

2.7 Reporting corrupt conduct and unacceptable behaviour

GPC is committed to creating and maintaining a workplace where strong ethical standards are upheld and displayed through employee behaviour. This includes the reporting and management of corrupt conduct and reprisal, legally referred to as *Public Interest Disclosure (PID)*.

Every employee of GPC has a legal and ethical responsibility to make a PID in relation to: (a) corrupt conduct, and (b) reprisal action. Corrupt conduct is deemed to be conduct that could, if proved, be a criminal offence or a disciplinary breach providing reasonable grounds to justify termination of employment and/or services.

Reprisal taken against a person who has made a PID will not be tolerated. GPC will take all reasonable steps to protect its employees from reprisals that are, or may be, taken against them for making a PID. Employees who take reprisal actions and/or make vexatious and/or frivolous reports may be subject to disciplinary action, up to and including termination of employment.

Unacceptable behaviour that may not amount to corrupt conduct should be reported to GPC for further action.

2.7.1 Reporting options

Employees who have reasonable suspicion of, or have observed actual corrupt conduct and/or reprisal action must report in accordance with the Public Interest Disclosure (PID) Procedure (Doc # 941363).

A PID can be made to any of the contacts listed below:

- a Employee's leader (who must inform the Employee Relations Specialist aligned to the business function of the disclosure);
- b Employee Relations Specialist;
- c Employee Relations Manager;
- d Public Interest Disclosure (PID) Officer (Company Secretary); or
- e GPC's confidential reporting hotline on 1800 063 408.

The PID Act 2010 (Qld), section 19 states that an employee may make a disclosure in any way, including anonymously, however for a disclosure to a GOC who has a reasonable procedure for making a PID, the employee must use the Public Interest Disclosure (PID) Procedure (Doc # 941363), further information can be obtained from the Crime and Corruption Commission on www.ccc.qld.gov.au or 1800 061 611.



3. More information

This Standard will be available to all employees, contractors and consultants.

This document is uncontrolled when printed. The current version of this Standard is located on Gladstone Ports Corporation's Intranet.

If you require any further information, please contact the Employee Relations Team.

4. Appendices

4.1 Appendix 1 – Related Documents

4.1.1 Legislation and regulation

Key relevant legislation and regulation, as amended from time to time, includes but is not limited to:

Type	What
Federal Acts	Corporations Act 2001 (Cth) Fair Work Act () 2009 (Cth) Australian Human Rights Commission Act 1986 (Cth) Age Discrimination Act 2004 (Cth) Disability Discrimination Act 1992 (Cth) Racial Discrimination Act 1975 (Cth) Sex Discrimination Act 1984 (Cth)
State Acts	Government Owned Corporations Act (1993) (Qld) Public Service Act 2008 (Qld) Anti-Discrimination Act 1991 (Qld) Environmental Protection Act 1994 (Qld) Right to Information Act 2009 (Qld) Information Privacy Act 2009 (Qld) Crime and Corruption Act 2001 (Qld) Public Interest Disclosure Act 2010 (Qld) Work Health and Safety Act 2011 (Qld)
Other	Various Australian Standards, Memoranda of Understanding/ Agreement and Government Policies are also applicable.

4.1.2 Gladstone Ports Corporation documents

The GPC Code of Conduct Standard shall apply in conjunction with all other GPC Governance documentation.