



Information Policy

1 Objective

Gladstone Ports Corporation (GPC) aims to ensure that it suitably manages its information assets, including information and technology resources in order to deliver services that are secure, compliant and fit for use. This Policy sets out GPC's Information commitments and provides the framework for setting objectives in alignment with associated management systems requirements.

2 Scope

This Policy applies to all GPC Directors, employees and people entering, working on, and/or undertaking activities on behalf of GPC, on GPC owned and operated sites.

This Policy applies to all GPC controlled activities.

3 Commitments

GPC commits to:

- Value information as a strategic asset and manage it accordingly.
- Adopt a whole of business approach to managing, governing, sharing and using information and technology to ensure compliance with relevant legislative obligations and aligned with the information life cycle.
- Provide and maintain technology systems that add business value and enable the better use of information in decision-making processes.
- Comply with relevant business obligations and standards and seek to reduce risks associated with potential loss or misuse of information.
- Continually seek to proactively test to understand and learn from potential and events to improve our performance and practices.
- Maintain robust information and technology environments, in alignment with identified Information Management and Technology Principles.
- Protect the confidentiality, integrity and availability of all GPC assets, ensuring complete and reliable records of decisions and actions taken whilst protecting against the loss and corruption of information.
- Ensure that the lifecycle management and destruction of records is defensible and in compliance with industry relevant legislation and standards.
- Ensure the collection, storage, use and disclosure of personal information is in accordance with the information privacy principles.
- Define, develop and implement standards and procedures that outline appropriate behaviours that enable compliant delivery of information systems and practises.
- Deliver training and awareness programs to improve and maintain appropriate digital and information skills within the workforce.

- Ensure that information is secured from unauthorised access, use and/or disclosure but remains accessible to employees to enable them to perform their duties.
- Govern the use of technology in a consistent manner that enables innovation and collaboration to support the strategic direction of the business.

4 Roles and Responsibilities

To ensure that GPC complies with its Information duties and obligations;

The Board is responsible for:

- Setting GPC's strategic direction, tone and culture;
- Reviewing and approving the Governance Framework, including this Policy and other Governance processes as appropriate;
- Understanding GPC's risk profile, setting the Board Risk Appetite and ensuring GPC has appropriate structure, resources and systems to reduce risks to so far as is reasonably practicable;
- Monitoring and reporting on the performance of GPC to ensure duties are being met; and
- Exercising due diligence and care to meet legislative and ethical requirements.

The Chief Executive Officer and Executive Leadership Team is responsible for:

- Promoting leadership, values and culture;
- Ensuring this Policy and GPC's management systems are used in business planning to set and review objectives and targets aimed to execute the strategic direction;
- Implementing this Policy through adequate resources;
- Promote and ensure compliance with this Policy, regulatory obligations, our Code of Conduct and GPC's management systems and frameworks;
- Ensuring GPC systematically reduces risks to so far as is reasonably practicable through robust management systems;
- Monitor controls implementation and effectiveness through verification and reporting processes, including ensuring processes to receive and respond promptly to hazards, risks and incidents; and
- Performance reviews, overseeing corrective actions and reporting to the Board, including any material non-conformances with this Policy.

All employees and other workers are responsible for:

- Understanding and working in accordance with this Policy and complying with all relevant legislative, Code of Conduct and management system requirements;
- Taking reasonable care and ensuring their acts or omissions do not adversely affect themselves, GPC and others;
- Supporting and promoting positive and above the line behaviours and actions; and
- Reporting near misses, incidents and hazards to support GPC as a learning organisation.

5 Implementation

GPC operates under certified management systems which provide the frameworks to implement the Information and Technology commitments. These are supported by Policies, Standards, Strategies and associated Procedures, processes and training to implement.

Conformance to this Policy will be monitored through committees, external/internal audits and review processes.

The Policy will be communicated through relevant GPC Inductions, and made available on the internal and external websites.

A Policy Commitments Statement will also be displayed at all workplaces to further support communication and awareness, which will be reviewed regularly in line with this Policy.

6 Governance

GPC is a Government Owned Corporation and is required to comply with its own and the State Governments Corporate Governance obligations and all applicable legislation.

This Policy forms part of the implementation of and compliance with these requirements.

Under GPC's Corporate Governance Framework, all Policies are owned by the Board.

7 Document control

Formal review, consultation and authorisation processes are to be led by the Chief Financial Officer to ensure the Policy remains current and fit for purpose at a minimum every 2 years. Reviews can be carried out at any time if it becomes evident that the document requires amendment due to changes in associated legislation and/or business processes.

Version No.	Revision date	Revision description	Responsible ELT	Endorsed by	Approved by
1	28/02/2026	Create new Policy in alignment with new template/format	EGMCFO	CEO and ELT 27/02/2024	BOARD 29/02/2024
2	20/01/2027	Policy updated to include records management requirements	CFO	Deputy Company Secretary Acting Company Secretary	Board 26/02/2025

If you require any further information, please contact the Responsible ELT.

This document contains confidential material relating to the business and financial interests of Gladstone Ports Corporation Limited. Gladstone Ports Corporation is to be contacted in accordance with Part 3, Division 3 Section 37 of the *Right to Information Act 2009* should any Government Agency receive a Right to Information application for this document. Contents of this document may either be in full or part exempt from disclosure pursuant to the *Right to Information Act 2009*.

The current version of this Policy is available on GPC's Intranet.

© 2020 Gladstone Ports Corporation Limited ABN 96 263 788 242