



Code of Conduct Policy

Brief description

This Policy is based on GPC's vision, mission, corporate values, behaviours and legal and regulatory obligations. It outlines how GPC Representatives, Consultants, Contractors, Inducted Visitors and Labour Hire Workers are expected to behave. As the custodians of our business, our people and our reputation, GPC Representatives, Consultants, Contractors, Inducted Visitors and Labour Hire Workers are required to demonstrate leadership and commitment to this Policy.

Document information

Current version	#1507461v17
First released	23/06/2003
Last updated	05/09/2022
Review frequency	Every 2 years or as required
Review before	30/06/2026
Audience	Officers, Employees, Contractors, Consultants, Inducted Visitors and Labour Hire Workers

Document accountability

Role	Position
Owner	Board
Custodian	CEO

Endorsed by Board on 23/09/2022

If you require any further information, please contact the Custodian.

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

1 Terms and definitions

Terms that are capitalised and not otherwise defined in this Policy are defined in the GPC Corporate Glossary Instruction (as listed in Appendix 1 – Related documents).

2 Introduction

2.1 Purpose

GPC is committed to the highest level of integrity and ethical standards in all business dealings. This Policy:

- (a) sets out the visions, missions, corporate values and behaviours that inform the creation of GPC's code of conduct and expected behaviour of all representatives; and
- (b) outlines the expected standards of conduct and values that all persons must demonstrate whilst working with GPC.

2.2 Scope

This Policy applies to all GPC Representatives, Consultants, Contractors, Inducted Visitors and Labour Hire Workers. Everyone working for GPC, from the CEO through all levels including Employees, Contractors, Inducted Visitors and the Board, are equal when it comes to observing this Policy. If you are unsure of any particular aspect of the Policy, you should discuss it with your Leader.

2.3 Objectives

GPC desires to foster an environment that is professional, customer responsive, safe and free from any form of unlawful, corrupt or inappropriate behaviour.

It is a fundamental principle of GPC's values that all business affairs are conducted respectfully, legally, ethically and with strict observance of the highest standards of integrity and propriety. This Policy is based on that principle.

All GPC Representatives, Consultants, Contractors, Inducted Visitors and Labour Hire Workers are required to ensure they are familiar with this Policy and that their behaviour is at all times consistent with the expected standards of conduct.

3 Commitments

3.1 Our vision, mission, values and guiding principles

(a) Our vision

GPC's vision is to be Australia's premier commodity port.

(b) Our mission

GPC's mission is to responsibly manage, develop, and facilitate prosperity of others through operating our port facilities and services in an economically, environmental and socially sustainable manner.

(c) Our Values



Growth

Develop and Grow

We are absolute in our resolve to make a difference. Better people and brighter prospects for future generations. We are not content to rest - we encourage high performance. Challenge with respect and courage in our endeavour to maximise our Ports contribution. We will always find a way.



Prosperity

Create and Sustain

We are focused on facilitating prosperity for others that trade through our Ports. Through our efforts, our customers, shareholders and ourselves will benefit. We will not take for granted what has been created, we will not let it slip, we are united in maximising the region's prosperity. We are proud people.



Community

Care and Contribute

We are family. We look out for each other. We are respectful neighbours and contribute to our region. We treat our visitors and customers like we do ourselves. We empower people and avoid harm. We demonstrate humility and strive for our communities' implicit trust. We acknowledge all communities.

3.2 Behaviours required to comply with this Policy

All GPC Representatives, Consultants, Contractors, Inducted Visitors and Labour Hire Workers must demonstrate their commitment to this Policy through adherence to the following six principles:

- (b) we put safety above all else;
- (c) we comply with the law, GPC's governance systems and communication requirements;
- (d) we value our people;
- (e) we contribute to our customer's success;
- (f) we use our resources and information appropriately; and
- (g) we are committed to sustainability and community support.

GPC requires its representatives to act with respect, honesty, integrity and transparency as these qualities cultivate the trust of our customers, colleagues and the community.

4 Implementation framework

To support and demonstrate these Policy commitments, GPC has:

- implemented a Code of Conduct Procedure to ensure that the principles in this Policy are clearly explained and available to all GPC Representatives, Consultants, Contractors, Inducted Visitors and Labour Hire Workers, as well as various other supporting Governance Documents; and
- ensured that GPC's values are:
 - at the forefront of all its business dealings; and

- a key focus when measuring the performance of GPC Representatives, Consultants and Contractors, Inducted Visitors and Labour Hire Workers (where relevant); and
- developed awareness of this Policy and the minimum standards of behaviour required from all GPC Representatives, Consultants, Contractors, Inducted Visitors and Labour Hire Workers.

5 Monitoring and review

Conformance to this Policy will be monitored through external and internal audit processes.

Actual or suspected breaches of this Policy will be treated as a serious matter and may have serious consequences (e.g. Employees may undergo disciplinary action (including termination of employment) and Contractors may have their contracts terminated). Material breaches will be reported to the Board.

Further details about the enforcement and review of this Policy are set out in Code of Conduct Procedure.

6 Appendices

6.1 Appendix 1 – Related documents

Gladstone Ports Corporation documents

The following documents relate to this Policy:

Type	Document number and title
Tier 1: Policy	#1439735 People Policy
	#174070 Conflicts of Interest Policy
	#1603663 Fraud and Corruption Policy
	#1473669 Sustainability Policy
Tier 2: Standard/Strategy	#87582 Equity, Diversity, Harassment and Discrimination Standard
	#1331115 Fit for Work Standard
Tier 3: Specification/ Procedure/Plan	#1668203 Code of Conduct Procedure
	#1455068 Gifts and Benefits Procedure
	#941363 Public Interest Disclosure Procedure
	#945900 Performance Planning and Review Specification
	#1463859 Managing Unsatisfactory Performance Specification
	#960456 Managing Discipline Specification

Type	Document number and title
	#1331120 Fatigue Risk Management Procedure #1067296 Information Privacy Procedure #1522205 Whistleblower Protection Procedure (Internal)
Tier 4: Instruction/Form/Template /Checklist	#1621179 Corporate Glossary Instruction
Other	N/A

6.2 Appendix 2 – Revision history

Revision date	Revision description	Author	Endorsed by	Approved by
23/06/03	First release.	Geoff White, Company Secretary	Leo Zussino, Chief Executive Officer	Board
19/04/06	Amended to include references to the Whistleblower Hotline and Drug & Alcohol Testing.	Geoff White, Company Secretary	Leo Zussino, Chief Executive Officer	Board
27/06/06	Amended to include CQPA Trading in Securities Section.	Geoff White, Company Secretary	Leo Zussino, Chief Executive Officer	Board
28/03/13	Superseded by #928057 on 16/03/13.	Mariette Lansdell, Company Secretary	Leo Zussino, Chief Executive Officer	Board
13/06/2013	Updated section 4.7.1 wrongdoing replaced with reprisal action.	Mariette Lansdell, Company Secretary	Leo Zussino, Chief Executive Officer	Leo Zussino, Chief Executive Officer
23/06/17	Updated Code of Conduct, following KPMG Audit Action requirements.	Gavin Veach, Human Resources Manager	Peter O'Sullivan, Chief Executive Officer	Peter O'Sullivan, Chief Executive Officer
27/06/19	Departmental review.	Gavin Veach, Human Resources Manager	Rowen Winsor, People Community and Sustainability General Manager	Board
19/11/20	General legal review and update.	EMT	CEO	Board

Revision date	Revision description	Author	Endorsed by	Approved by
24/05/21	v13 Administrative updates, published	Annette Hughes, Human Resources Specialist	Julian Blight, Manager HR Operations	Rowen Winsor, EGMP
23/09/2022	V14 review, published	Annette Hughes, Human Resources Specialist	Ged Melrose, Acting Executive General Manager People	Board
26/04/2023	v15 is a duplicate of v13 created due to eDocs system error			
25/11/2025	v16 Board Minutes September 2025 to defer review date before 30/06/2026 v17 published	Kylee Lockwood, Risk and Governance Lead	Kylee Lockwood, Risk and Governance Lead	Board