



Ethics and Integrity Policy

1 Objective

Gladstone Ports Corporation (GPC) aims to create an environment which combines our values and behaviours with appropriate systems of control and monitoring so we can operate in ways which build trust and accountability across our workforce and stakeholders.

This Policy sets out GPC's Ethics and Integrity commitments and provides the framework to prevent, detect, respond, and ensure that our organisational culture is characterised by the highest standards of ethical behaviour and accountability.

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:

- Encourage open and truthful communication in all dealings, to ensure we act with integrity and professionalism
- Foster an environment where all individuals are treated with dignity, fairness, and respect
- Ensure individuals are accountable for their actions, including declaring all potential, perceived and actual conflicts as they go about their work
- Adhere to all applicable laws and industry standards
- Protect sensitive information and respect privacy
- Ensure organisational decisions are made free from personal bias
- Allow for an environment where concerns can be raised through a confidential and accessible reporting process
- Having a fair and transparent investigative process which ensures impartiality and confidentiality
- Manage breaches of this policy in accordance with performance standards
- Providing training and support to individuals to ensure they understand their responsibilities
- Regularly review our approach and policy to reflect best practice and new challenges

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 as 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 as 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 ethics and integrity 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 Executive 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 | 18/11/2024 | Create new Policy for new policy framework – to replace existing COI Policy and Fraud and Corruption Policy | CEO | ARC | BOARD |
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If you require any further information, please contact the Responsible ELT.

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

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