



GPC Supplier Code of Conduct

Brief description

The Gladstone Ports Corporation (“**GPC**”) wants to do business with ethically, environmentally and socially responsible suppliers.

This Supplier Code of Conduct (the “**Code**”) sets out the expectations that GPC has of businesses that want to sell their goods or services to GPC, and outlines what constitutes a responsible supplier.

It enhances our commitment to help Queenslanders prosper and support genuine local businesses by outlining clear standards and expectations.

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Document accountability

Role	Position
Owner	Supply Superintendent
Custodian	–Strategic Procurement Specialist

Endorsed by Executive Management Team on 28/02/2026

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

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The current version of this Instruction is available on GPC’s Intranet.

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1. Terms and definitions

In this Instruction:

“**Buyer**” means the GPC requestor for the provision of the product, services or materials to be procured.

“**Code**” means the GPC Supplier Code of Conduct that outlines the expectations that GPC has of those suppliers that want to do business with GPC. The Code aligns with Queensland Government requirements as expected of Government Departments, Agencies and other Government owned or established entities i.e. GOC, Statutory Authorities etc.

“**PAM**” means Procurement Assurance Model and PAM framework in accordance with QPP

“**QPP**” means Queensland Government implemented Queensland Procurement Policy (QPP), to ensure Government agencies conduct business with ethically, environmentally and socially responsible suppliers. The PAM can be found via the following Government Website link: www.qld.gov.au/procurement

“**Supplier**” means a person or organisation that offers for sale/provides a product or service. Vendor and supplier have similar meanings. These terms are often used interchangeably. GPC most commonly uses the word ‘vendor’ but where the word ‘supplier’ appears, readers should interpret this word to mean the same as ‘vendor’.

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



2. Introduction

2.1 Purpose

This Code sets out the expectations that GPC has of businesses that want to sell their goods or services to GPC, and outlines what constitutes a responsible supplier.

2.2 Scope

- a) This Code applies to all procurement activities regardless of their value.
- b) Suppliers should refer to the Code when considering supplying to GPC.
- c) GPC reserves the right to do business with suppliers who demonstrate compliance with this Code.
- d) Suppliers are expected to proactively self-assess adherence and take action to remedy any shortcomings.
- e) In applying the Code, GPC will consider both the value and complexity of the procurement activity and include questions on the Code in procurement documentation. Suppliers with queries on how the Code is applied in any procurement activity should contact the GPC Supply Department.
- f) The Code complements existing laws, policies, and GPC terms and conditions, including the Queensland Procurement Policy (QPP).
- g) In addition to any specific items mentioned elsewhere within this Code, you must comply with all relevant legislation and standards – for example *Disability Discrimination Act 1992 (Cth)*.
- h) Breaches of your contractual, policy and legal obligations may result in consequences for unmet commitments outlined in the PAM Framework.

2.3 Objectives

It enhances our commitment to help Queenslanders prosper and support genuine local businesses by outlining clear standards and expectations.

The standards and expectations set out in the Code are not intended to reduce, alter or supersede any other obligations which may be imposed by any applicable contract, law and regulation or otherwise.

3. Ethical expectations

Our procurement is conducted in an environment of integrity, probity and accountability. We are committed to the highest ethical standards and expect our suppliers to commit to the same.

You can show this by doing the following:

3.1 Managing conflicts of interest

You must ensure that all conflicts of interest (whether actual, reasonably perceived or that could arise in future) are disclosed as soon as possible. Suppliers should submit a copy of their



conflicts of interest policy where they have one.

3.2 Demonstrating high standards of conduct

You must ensure that your business' behaviour is beyond reproach. You must not engage in fraudulent or corrupt activities including, for example, bribery or money laundering, or act in any manner which, by association, brings the government into disrepute.

3.3 Handling information

A practical approach must be taken to implement appropriate cybersecurity and privacy practices in order to ensure information is safeguarded and services continue to operate.

3.4 Not engaging in inappropriate supply market behaviours

You should encourage innovation and competition and must not act in a manner which involves a misuse of your market power or would be otherwise improper (e.g. collusive arrangements). This includes not procuring dumped goods.

3.5 Acting properly toward government officers

You are expected to respect the ethical and code of conduct requirements that our staff need to meet, and not engage in actions which run counter to these obligations. You must not try to influence decision making through the use of inducements (e.g. offering gifts and benefits). Your conduct should recognise the expected integrity and accountability of our employees and their adherence to the Code of Conduct for the GPC.

3.6 Model good business practices

Your business should be conducted in a way that shows best practice corporate management. This includes promoting a collaborative relationship where buyer and supplier work together to resolve issues in a timely and respectful manner. This helps to avoid contractual disputes and promotes good working relationships.

3.7 Sub-contractor payment terms

We want to do business with suppliers that offer payment terms to sub-contractors that are no less favourable than those provided to you by GPC (unless otherwise mutually agreed with the sub-contractor). This also includes meeting Project and retention trust account requirements under the *Building Industry Fairness (Security of Payment) Act 2017* where applicable.

3.8 Meeting required standards

The goods and services provided should meet relevant compliance requirements and the Australian Standard (or an international standard in the absence of an Australian Standard) where specified. For building and construction this also includes using conforming products and materials.



4. Social expectations

We want to do business with suppliers who support the welfare of both their employees and the community generally. You can show this by doing the following:

4.1 Managing workplace health and safety

As well as complying with all workplace health and safety laws and regulations, you must also regularly manage and review workplace hazards and provide any required training to your employees. This includes proactively engaging with employees, industry bodies and unions.

4.2 Acting to stop domestic and family violence

The Queensland Government and GPC is committed to ending domestic and family violence. We ask that you support this by implementing appropriate initiatives within your business, such as having a stated zero tolerance approach to domestic and family violence or having a workplace domestic and family violence policy in place.

4.3 Treating employees fairly

You must respect every worker's workplace rights and entitlements and ensure compliance with all relevant workplace laws, regulations and instruments. This includes properly paying employees, giving them their entitlements, not discriminating unlawfully and committing to workplaces free of harassment. This includes recognising the right of employees to be members or choose not to be members of trade unions.

4.4 Acting against human rights exploitation in the supply chain including addressing modern slavery risks

You must make all reasonable efforts to ensure that businesses within your supply chain are not benefiting from, engaged in or complicit with, human rights exploitations such as forced or child labour, coercion, or any type of modern slavery practice as defined in the *Modern Slavery Act 2018* (Cth). This includes conducting appropriate risk assessments and managing identified risks in vulnerable industries (such as textiles, clothing and footwear), and where relevant, establishing policies and practices that address supply chain risks of modern slavery and other human rights exploitation.

4.5 Ensuring workplace diversity

We want to enhance workplace diversity. We value businesses that have policies and practices in place to encourage diversity and ensure equal employment opportunity for all people. This includes embracing social benefit opportunities such as training and employment opportunities for disadvantaged and marginalised jobseekers.

4.6 Providing quality, secure local jobs

We value suppliers who provide quality, secure local jobs. These jobs provide:

- employment where people live;
- permanency of employment;
- certainty of hours;
- fair wages and conditions;
- superannuation and workers compensation; and
- genuine respect for the rights of workers to collectively bargain.

4.7 Keeping Queensland children safe

The Queensland Government and GPC is committed to ensuring every child has the right to be safe,



no matter where they are. The Child Safe Organisations Act 2024 strengthens our state's culture of safety and wellbeing for all Queensland children. Businesses and organisations that work with children in Queensland, or provide services and spaces specifically for them, need to demonstrate they are child safe and implement the 10 Child Safe Standards and related reporting requirements.



5. Environmental expectations

We want to procure in a way that also protects and advances environmental priorities. You can show this by doing the following:

5.1 Enhancing environmental sustainability

We want you to look for opportunities to improve environmental outcomes. Things you can do include, but are not limited to:

- waste minimisation and recycling;
- reducing and/or offsetting carbon emissions;
- using solar or other renewable energy where possible;
- reducing the use of energy, water or other resources;
- reducing the use of hazardous and toxic substances, and ensuring their correct disposal; and
- minimising packaging.

6. How to deal with suspected breaches of the code

6.1 Concerns

- a) Concerns should be directed to the GPC Supply Department – 07 4976 1333: OR:
The Principal Representative (GPC Contract Owner)/department within GPC which has the contract with the supplier concerned.
- b) Alternatively, concerns can be raised with the Queensland Government Procurement (QGP). QGP will triage the suspected breach and provide advice in relation to the PAM framework.
- c) You can contact this unit by:
 - i. <https://www.business.qld.gov.au/running-business/marketing-sales/tendering/supply-queensland-government/procurement-complaint>
 - ii. Email: PAMComplaint@hpw.qld.gov.au; or
 - iii. Free call: 1300 10 50 30.

6.2 Concerns regarding illegally activity or Corruption

Any concerns regarding illegal activity or corruption should be immediately referred to either the Queensland Police Service, Australian Federal Police or the Crime and Corruption Commission.

7. Further Information

Further information: supplyadmin@gpcl.com.au
Phone: 07 4976 1422.
<https://www.gpcl.com.au/procurement-tenders>.

betterprocurement@epw.qld.gov.au
13 QGOC (13 74 68)
<http://www.qld.gov.au/procurement>



8. Appendices

8.1 Appendix 1 – Related documents

(a) Legislation and regulation

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

Type	Legislation/regulation/guidelines
Federal Acts	<i>Modern Slavery Act 2018 (Cth)</i>
State Acts	<i>Government Owned Corporations Act 1993 (Qld)</i>
Other	Queensland Government Procurement Strategy – <i>Backing Queensland Jobs</i> Queensland Procurement Policy (QPP)

(b) Gladstone Ports Corporation documents

The following documents relate to this Instruction:

Type	Document number and title
Tier 1: Policy	#1932103 Procurement Policy
Tier 2: Standard/Strategy	#928057 Code of Conduct
Tier 3: Specification/ Procedure/Plan	#1326084 Procedure – Procurement of Goods and Services over \$50K #1284312 Procedure – Procurement of Non-Contracted Services and Non-catalogued Goods up to \$50K
Tier 4: Instruction/Form/ Template/Checklist	#1715892 GPC Supplier Code of Conduct Declaration Instruction #1721839 GPC Supplier Code of Conduct – Supplier Declaration Form #1621179 GPC Corporate Glossary Instruction #1715894 GPC Supplier Code of Conduct – Guidance #1312245 Vendor application form
Other	



8.2 Appendix 2 – Revision history

Revision date	Revision description	Author	Endorsed by	Approved by
28/06/2021	Drafted guidelines	Gary Larsen Supply Superintendent	Rufus Gandhi, General Counsel	GPC Executive Management Team (EMT)
13/01/2022	Updated version and revision dates	Gary Larsen Supply Superintendent	Jenelle Druce, Acting Chief Financial Officer	Jenelle Druce, Acting Chief Financial Officer
22/12/2025	Updated version and revision dates to align to QPP 2026 and remove ESTF	Gary Larsen Supply Superintendent	Charleen Riley, Acting Chief Financial Officer	Jenelle Druce, Acting Chief Financial Officer