

CODE OF CONDUCT



INTRODUCTION



Most of the time, it's easy to do the right thing, but sometimes the right course of action isn't so obvious. Our Code of Conduct helps us by defining the values, ethics, rules and principles that shape the behaviours that you can expect of PBPL and are expected of you.

Our success as an organisation depends greatly on how each of us—individually and collectively—demonstrates a commitment to achieving exceptional results the right way.

At PBPL, our values guide us in delivering each of our strategies, programs, projects and daily life at the port so that we can continue to perform and deliver for our customers, stakeholders and the community. Our values emphasise the thinking and practices that underpin our success as we move forward and establish a common understanding of how we work.

In March 2024 the Executive Leadership team announced our new Leadership Commitments, setting the standard for ourselves and all leaders within PBPL. We understand that this will be a journey for leaders to embed the commitments into their way of working.

Our values and our Leadership Commitments underpin our Code of Conduct (Code). This Code sets out the standards of responsibility and ethical conduct required of every employee and contractor while working at PBPL.

This Code applies to you whenever you are identified as a representative of PBPL. In some circumstances, this will include times when you are outside your immediate workplace or working hours, out of hours work activities, or in the community representing PBPL. This Code is

not a substitute for good judgement, nor does it cover every situation you may encounter. However, the Code contains the basic principles and standards you are required to apply in your work at PBPL.

PBPL Board and Executive team are committed to ensuring our workplace culture aligns with the values and behaviours outlined within this Code. We are also committed to ensuring that our employees feel comfortable raising matters that are of genuine concern to them. We encourage all employees to highlight any concerns or suspected breaches of this Code via the methods outlined in the Upholding our Values and Behaviours section of the Code.

PBPL's Whistleblower Policy outlines further protections and procedures available to you when reporting genuine concerns relating to any suspected corruption, serious misconduct or fraud. Reported concerns that meet the definition of a "protected disclosure" under the Whistleblower Regime will receive protection under that legislation. Refer to PBPL's Issue resolution Policy for any disclosures relating to a personal work related grievance.

Any reports of a breach—whether they are a protected disclosure or reportable conduct—will be taken seriously and investigated in a confidential, fair and objective manner. Strict confidentiality is assured, except when required by law to be released to regulatory agencies.

It may also be necessary to reveal the nature and substance of information provided to various people on a confidential basis to allow the report to be investigated. All reasonable steps will be taken to ensure you are not disadvantaged or discriminated against for reporting concerns in good faith.

This Code has the full support of the PBPL Board and Executive Leadership team. Everyone who works at PBPL is expected to read, understand and comply with the Code. A breach of the Code may result in disciplinary outcomes that may include termination of your employment with PBPL.

You are encouraged to refer any questions you may have to your manager.

Neil Stephens, CEO



PBPL'S VALUES AND LEADERSHIP COMMITMENTS:



Michael Dwyer
Dr. Gopikrishnan *John F. Murray* *Craig Barbour*

LEADERSHIP COMMITMENTS

AUTHENTIC

I am myself in all situations and am transparent about my expectations. I am open and willing to admit to mistakes, shortcomings, and displaying self-awareness.

CURIOUS

I display an eagerness to understand and learn.

COURAGEOUS

I respectfully stand up to address difficult issues and say what needs to be said, speaking up in support of people, values, and commitments.

EMPATHETIC

I am sensitive to other people's views, situations and reactions. I pick up on emotions and respond accordingly. My approach is respectful, and I value others.

EMPOWERING

I trust the people in my team and delegate wisely giving others ownership, and opportunities, to act and make decisions.

INCLUSIVE

I invite and encourage others to contribute opinions and ideas. I create a team where employees feel they belong and their thoughts, ideas and contributions are valued.

RESILIENT

I persist through challenges, grow through failures and celebrate results. I remain composed and productive under reasonable pressure and stress.



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PBPL'S COMMITMENTS

We look after our employees

Safety comes first, because physical and mental wellbeing are fundamental to a successful workplace. We're also committed to building a diverse workforce and an inclusive workplace culture.

We act with honesty and integrity

We always act with honesty and integrity in all of our dealings; we speak up and escalate any concerns.

We observe the law, our obligations, voluntary commitments and internal standards

We comply with all laws, regulations and obligations that are applicable to us, including internal PBPL policies and voluntary commitments.

We value and maintain professionalism in all of our dealings

We behave in a professional manner that fosters trust, confidence and goodwill. We are always respectful and ensure that we do the right thing. We strive to improve knowledge, skills and quality of work.

We respect confidentiality

We respect the confidential nature of information given in good faith to PBPL.

We manage conflicts of interest

We ensure our personal and business interests never interfere with our ability to make sound, objective decisions.

We uphold our values and behaviours as outlined in the Code of Conduct

We investigate, deal with and appropriately report on suspected breaches of the Code.

WORKING TOGETHER FOR THE **SUCCESS** OF **PBPL**



Looking after our Employees

In our business, safety comes first because physical and mental wellbeing are our priority. We create a supportive environment, where we feel safe to challenge the norm, to speak up, to say what we mean.

Safety is a shared responsibility and we each make a personal commitment to it. By taking care of each other, PBPL becomes a better business for all.

We're also committed to building a diverse workforce and an inclusive workplace culture. Embracing and valuing diversity and inclusion leads to a better understanding of, and engagement with, the employees we work with, the customers we serve and the communities in which we work.

At PBPL, we all work together for the success of PBPL.

PBPL:

- Seeks to provide a safe, diverse and inclusive workplace culture.
- Welcomes all and harnesses our diversity through trust and respect for one another.
- Has in place a safety management system (SMS) that allows for the effective reporting and management of workplace hazards, near misses and workplace injuries.
- Does not tolerate bullying or harassment toward, or unlawful discrimination against, any of our employees.
- Makes available PBPL's Employee Assistance Program to provide support and professional guidance to our employees, and their immediate families, experiencing difficult times.

All employees are expected to:

- Take personal responsibility for their own health, safety and wellbeing and that of others.
- Present themselves fit for work and never in a condition which could compromise anyone's safety including being under the influence of alcohol or drugs.
- Never consume alcohol or drugs that impair their ability to work safely.
- Comply with all policies, standards and guidelines that apply to the safe and healthy performance of their jobs
- Speak out immediately against unsafe behaviours or conditions and stop working until safe to do so (e.g.: if conditions change, temporary or permanent loss or expiry of a licence, or an injury).
- Never ignore unsafe behaviours or conditions or assume that health and safety is someone else's responsibility.
- Never ignore signs of a colleague/ supplier/ contractor appearing unfit for work, which could include impairment due to fatigue, being under the influence of drugs and/or alcohol, or under noticeable emotional or psychological distress.
- Immediately report any health and safety concerns, including hazards or incidents to their supervisor and through PBPL's Health and Safety Digital System (Evotix).
- Treat each other with dignity and respect.
- Report any concerns of inappropriate workplace behaviour as per PBPL's Issue Resolution Policy.

ALWAYS ACTING WITH HONESTY AND INTEGRITY



Acting with Honesty and Integrity

We give our focus and energy to all the things that matter to PBPL's success, always acting with honesty and integrity. Ethical behaviour is central to PBPL's approach to business and our success depends greatly on how we demonstrate ethical behaviour individually and collectively.

PBPL:

- Honours its contracts with employees, customers and all third parties.
- Provides mandatory training on this Code and implements other policies and procedures to assist our employees to understand what is expected of them.
- Provides effective leadership and ensures segregation of duties to prevent fraud or other dishonest behaviour.

All employees are expected to:

- Not use property belonging to PBPL, our customers or our suppliers for personal gain.

- Safeguard PBPL's assets including physical assets, information assets and intellectual property rights, by observing all policies and procedures relating to the safe and proper use of those assets, including PBPL's Technology Policy and Standard.
- Provide complete, accurate and honest information to our colleagues, our customers and any regulator who lawfully makes a request for information from us. This includes not making any false statements, misrepresenting information or withholding facts with the intent to mislead, or encouraging others to do.
- Not participate in any activities that cause, support or conceal corruption or bribery in any form. Further guidelines can be found in PBPL's Anti-Bribery and Corruption Policy.
- Not participate in collusive behaviour (including with our competitors).
- Speak up whenever they observe dishonest behaviour by our colleagues or our suppliers, or otherwise in relation to the conduct of our business.

Observing the Law, our Obligations, Commitments and Internal Standards

We operate in an industry that is subject to many laws, regulations and obligations. Breaches of the law or our obligations can have serious consequences for PBPL and our employees and Directors. It is therefore imperative that we observe the laws, regulations and obligations that apply to us. We must also comply with PBPL's internal policies and processes, which often exceed standards expected by law, as they take into account our voluntary commitments and the values that guide our approach to responsible business.

PBPL:

- Provides our employees with appropriate induction and training – when our employees join PBPL or when they change the role they undertake for PBPL – and at regular intervals while they are employed.
- Makes readily available to our employees appropriate policies and procedures on legislative compliance, delegations of authority and other subjects as appropriate.

- Has procedures in place to assist our employees to identify and communicate material changes in law which have the potential to affect the way our employees are required to perform their duties of employment.
- Seeks to protect the environment in which we operate by observing all applicable laws and complying with PBPL's environmental management system.
- Is open and transparent about its operations, including through ongoing sustainability reporting.

All employees are expected to:

- Understand what laws apply to the jobs they do. This includes completing training provided by PBPL on matters such as Competition & Consumer Law, Privacy, Work Health, Safety & Wellbeing, Environment and fair treatment.
- Act only within their authority.
- Comply with PBPL policies and procedure
- Immediately report a potential conflict of interest.
- Report known breaches of the law in accordance with the requirements of this Code.

FOSTERING TRUST, CONFIDENCE AND GOODWILL



Valuing and Maintaining Professionalism

We are always respectful and ensure that we do the right thing. We are proud to represent PBPL and behave in a way that fosters trust, confidence and goodwill.

Acting professionally is the foundation of earning the respect and confidence of our customers, our suppliers, our employees and other stakeholders.

PBPL:

- Supports employees to develop the skills required to perform their duties of employment.
- Supports employees to develop their careers.
- Provides leadership development for employees
- Treats employees with respect and courtesy.

All Employees are expected to:

- Maintain and improve the skills necessary for the proper performance of their jobs.

- Seek help or guidance on matters beyond their capabilities.
- Only perform work responsibilities if they are fit for work and not impaired by fatigue, alcohol and/or drugs or psychological distress, in accordance with the relevant Workplace Health Standard.
- Be punctual in performing their duties of employment, including responding on a timely basis to telephone calls, emails and letters from our customers, our suppliers, our colleagues, and all other stakeholders.
- Not allow personal views to compromise the performance of their duties.
- Comply with PBPL's Technology Policy and Standard.
- Be polite and respectful in all of their dealings (including via social media).

Respecting Confidentiality

In the course of our business, employees may have access to information about PBPL's business, the affairs of employees, our customers, stakeholders and business partners. These groups expect that PBPL will respect the confidential nature of information given in good faith to PBPL. The Privacy Act requires that PBPL keep confidential certain categories of information about individuals. A number of the contracts PBPL is party to also impose legally binding obligations to maintain the confidentiality of information.

PBPL:

- Provides secure facilities in which to store confidential documents.
- Puts in place security arrangements to prevent inadvertent access to confidential information.

All employees are expected to:

- Keep the personal information of our employees, our customers, stakeholders and business partners confidential.
- Comply with the confidentiality obligations in their contracts of employment, including after they have left PBPL.
- Comply with contractual and other legal obligations to keep information confidential.

- Not disclose information which they know to be confidential, sensitive or privileged unless they are satisfied that the information is legitimately required for the performance of a PBPL employee's job and they are satisfied that the person will maintain the confidentiality of the information.
- Not encourage colleagues to disclose information which they know to be confidential, sensitive or privileged and which is not required for the performance of their own jobs.
- Secure all business records and files in their possession (including electronic records).
- Not use confidential information for personal gain.
- Take steps to ensure their security passwords and access codes to access PBPL facilities or Systems remain confidential and are not shared with other employees or recorded in an accessible place in accordance with the Technology Policy Standard and Procedure.
- Maintain company records in accordance with PBPL's Information Management Policy and Standard.
- Comply with PBPL's Privacy Policy.
- Not disclose to any person outside PBPL any information obtained from the performance of their jobs unless expressly authorised to do so by the person who provided the information.

MANAGING CONFLICTS OF INTEREST



Managing Conflicts of Interest

A conflict of interest exists if a PBPL employee has a personal interest which may influence, or could be perceived as influencing, the proper performance of their duties and responsibilities. Conflicts of interest can arise, however, it is the way in which conflicts of interest are managed which will determine how we are judged.

The keys to effective management of conflicts of interest are:

- Full disclosure of material personal interests which give rise to the conflict of interest.
- Refraining from participating in activities arising from the conflict of interest.

PBPL:

- Has procedures in place to allow our employees to disclose conflicts of interest.
- Does not make donations to any political party or to any individual in, or seeking to obtain, political office.

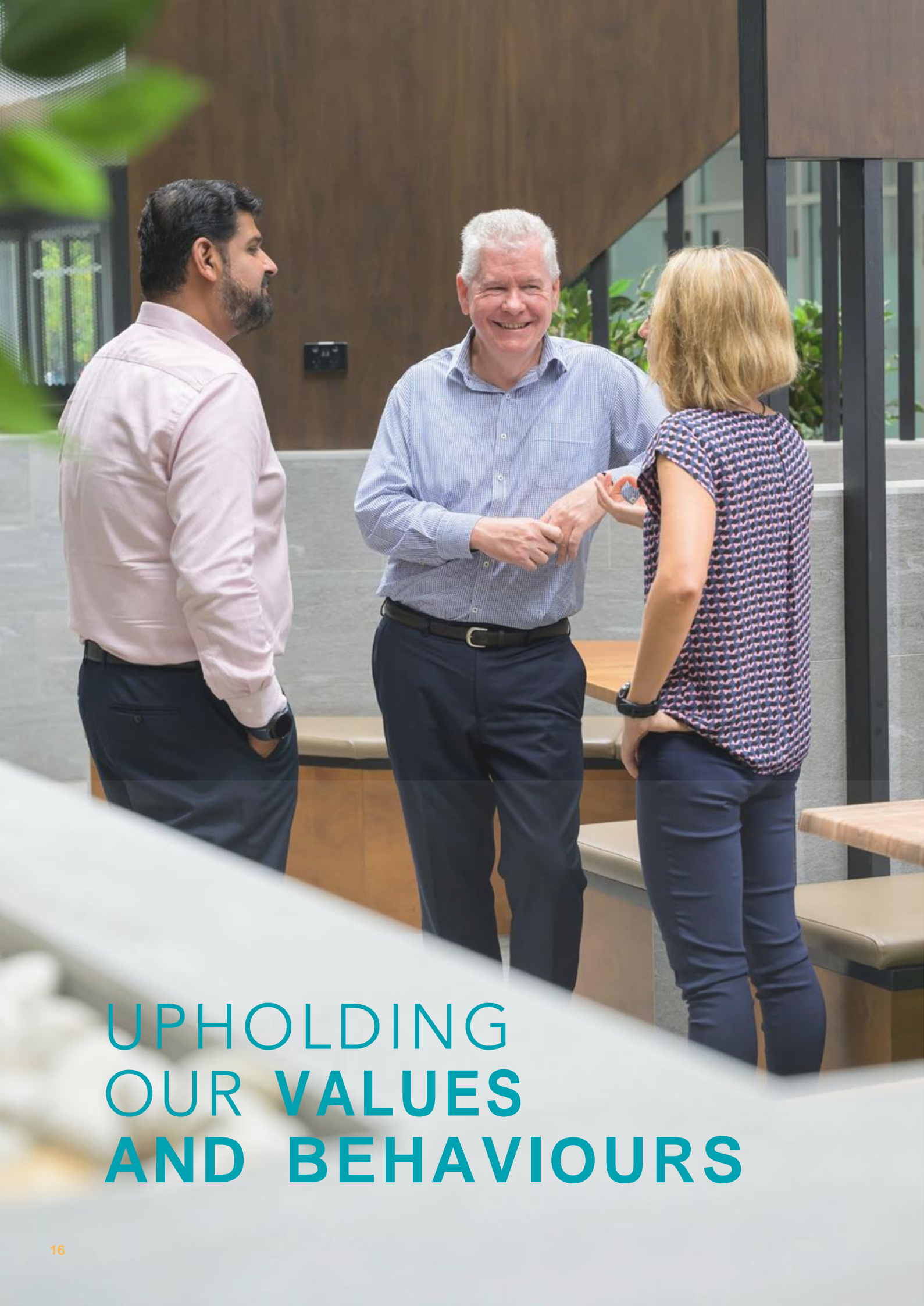
All employees and Directors are expected to:

- Seek the consent of their Executive Leader before commencing any employment or business activity which has the potential to reduce the time devoted to the performance of their duties at PBPL or affect their health, safety and/or wellbeing insofar as it impacts on their ability to perform the inherent requirements of their role, or which may create a real or perceived conflict of interest.
- Declare any interests that may constitute a conflict, and notify of any changes to these as and when they occur.
- Maintain independence and objectivity and avoid any conflicts of interest or undue influence that may arise, including from personal investments, financial or business relationships, employment of family members, or other relationships. All employees are also expected to disclose to the Executive General Manager People and Performance and their Executive Leader any material personal interests or relationships which may give rise to a conflict of interest.

- Not solicit, accept or offer payments, bribes, gifts or benefits which may influence, or which could be perceived as influencing, their ability to perform the duties of their employment objectively and impartially.
- Report for entry into PBPL's gift register all unsolicited gifts received in line with the Entertainment and Gifts (Benefits) Policy and comply with any direction to return the gift or otherwise alienate themselves from enjoying some or all of the benefit of the gift.
- Not make public comment in person or online about any matter, participate in any political activities, including outside of working hours, which can be attributed to their employment with PBPL or is in contravention with the interests of PBPL.
- Satisfy any legal duties that apply to them in respect to insider trading and tipping and comply with the provisions of the Corporations Act in relation to prohibited conduct of persons in possession of inside information. Insider Trading includes where the employee, officer or Director is aware of unpublished price-sensitive information relating to a company. Improper use of information or obtaining a benefit dishonestly may amount to official misconduct or a criminal offence. As with other potential conflict of interest situations, trading in securities by family members and associates may also give rise to an actual, perceived or potential conflict of interest.
- Familiarise themselves with their statutory responsibilities as employees, officers or directors, and comply with all applicable laws and regulations.

Additionally, Directors are expected to:

- Comply with the Conflicts Policy.
- Seek approval of the Board of any proposed securities trade where there is a reasonable risk that the proposed trading in those securities may give rise to a perception of misuse of information or conflict of interest.



UPHOLDING OUR **VALUES** AND **BEHAVIOURS**

We uphold our Values and Behaviours outlined under this Code

Each of us is responsible for complying with the Code. The Code applies to you whenever you are identified as a representative of PBPL. In some circumstances, this will include times when you are outside your immediate workplace or working hours, out of hours work activities, including social media, or when you are in the community on behalf of PBPL.

In complying with the Code, employees should ask the following questions to guide them to make the right decision about a possible course of action:

- Am I being honest and respectful?
- Are my actions legal and in accordance with PBPL's policies?
- Would I be unwilling or embarrassed to tell my family, friends, or co-workers?
- Would the reputation of PBPL be harmed if the action were made public?
- Could someone's life, health, safety, mental wellbeing or reputation be impacted due to my action?
- Could my actions appear inconsistent with PBPL's commitments to its stakeholders?

How to report a breach of the Code

If you become aware of a breach of the Code or have a reasonable suspicion of a breach or you have concerns about the behaviour of anyone at PBPL, you are urged to speak up.

If you make a report in good faith, the company will take all reasonable steps to ensure you are not disadvantaged personally or in your employment, even if the conduct that is reported is later found not to be in breach of the Code. At the same time, if you make an intentionally false or malicious report, you may find yourself in breach of the Code, and dealing with the consequences that follow.

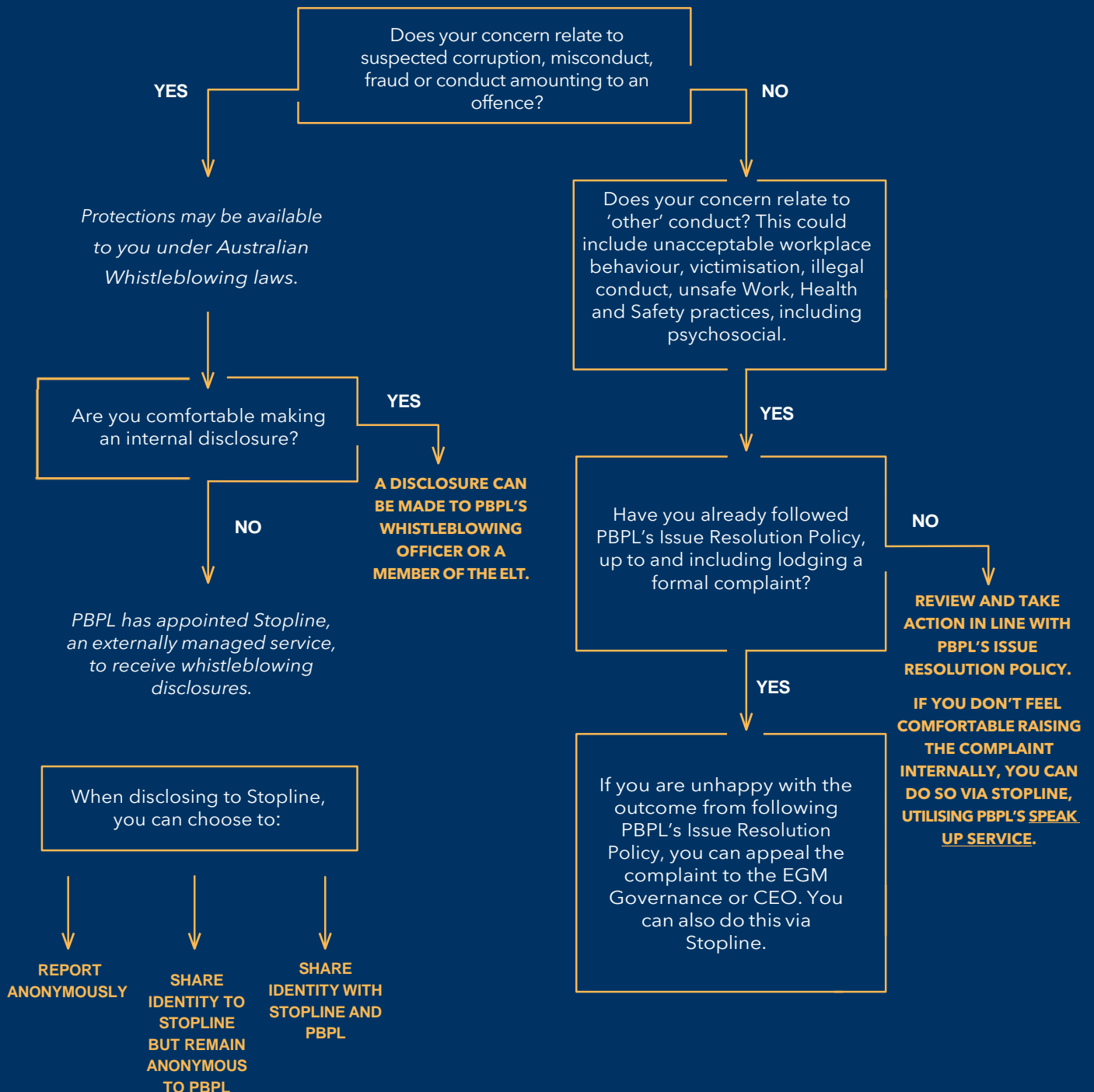
PBPL is also committed to taking all reasonable steps to ensure that you are not disadvantaged or discriminated against for reporting unacceptable behaviour in good faith. PBPL's Whistleblower Policy outlines further protections and procedures available to people reporting genuine concerns.

Our Code of Conduct is supported by other policies and standards:

- Entertainment and Gifts (Benefits) Policy
- Diversity and Inclusion Policy
- Unacceptable Workplace Behaviour Policy
- Sexual Harassment, Sex Discrimination and Hostile Work Environment Policy
- Procurement Policy
- Anti-Bribery and Corruption Policy
- Whistleblower Policy
- Issue Resolution Policy



HOW YOU CAN SPEAK UP



Please note: As this is an externally managed service, anonymity can be handled in a number of ways. However, you may not get a resolution on the complaint. Also note that if an issue directly involves you, even if you elected to remain anonymous, the circumstances you wish to report may identify you.

Note: You also retain the right not to choose any of the internal options and lodge a grievance with an external body, including:

- Fair Work Commission Australia
- Queensland Human Rights Commission
- QLD Police (for incidents including criminal conduct/sexual assault)
- WorkSafe



Contact your line manager, another manager or Executive, a supporting function (P&P, Contact Officer or Whistleblowing Officer) or our [Speak Up Service](#).



Email the Whistleblowing Officer
jenny.draper@portbris.com.au



Accessing Stopline
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