

Code of Conduct

PORT of BRISBANE
Here for the future



Message from the **Board and Executive Leadership Team**

At PBPL, our culture is a deliberate choice. It reflects the standards we set, the behaviours we expect, and the way we hold ourselves to account.



Most of the time, it is clear what the right thing to do is. At other times, decisions are less straightforward. This Code of Conduct provides the standards and principles to guide how we work together, make decisions, and represent PBPL.

Our success depends not only on what we achieve, but how we achieve it. Acting with integrity, respect and accountability builds trust with our people, our customers and the community.

As the Board and Executive Leadership Team, we are accountable for setting the tone and ensuring these standards are upheld. This means not only meeting the expectations in this Code of Conduct, but consistently demonstrating them, especially when decisions are difficult or pressure is high.

We expect everyone at PBPL to take personal responsibility for understanding and applying this Code of Conduct in their day to day work. Just as importantly, we support a culture where employees feel safe to speak up, challenge constructively, and raise concerns.

By living these standards, we protect what matters most; our employees, our culture, our reputation and the trust placed in us.

This Code of Conduct has our full support, and we are committed to leading by example.

Guy Cowan
PBPL Board Chair

Neil Stephens
Chief Executive Officer

[on behalf of the Executive Leadership Team]

Our Code of Conduct, Values and Behaviours

How They Fit Together

PBPL's success depends not only on what we achieve, but how we achieve it. This Code of Conduct sets the minimum, non-negotiable standards expected of everyone who works for or represents PBPL.

PBPL's Values describe who we are at our best:



Safety
Everyone Safe. Always.



Collaboration
Better Outcomes. Together.



Integrity
Right Choices. Every Time.



Excellence
Better than Yesterday.



Inclusion
Everyone belongs. Every voice counts.

Our **Behaviour Framework** brings these values to life by defining the behaviours expected in the workplace.

This **Code of Conduct** sets the standards that guide how we act, make decisions and take responsibility every day, helping us build trust, exercise sound judgement and uphold high ethical and professional standards.

The Behaviour Framework supports development. Where behaviour falls below expectations, it may be addressed through performance and development processes. Where behaviour breaches this Code of Conduct or other PBPL policies/standards, or creates safety, integrity, wellbeing, reputational, or legal risk, it may constitute misconduct and will be managed in line with the Managing Misconduct Policy.

This Code of Conduct applies to all employees, Directors and professional contractors, engaged to perform work for or on behalf of PBPL. It applies at all times when performing work for PBPL, at work related activities, and in any situation where you are, or may reasonably be perceived to be, representing PBPL, including online activity, social media and community engagement.





How to Use This **Code of Conduct**

Use this Code of Conduct to support everyday decisions and actions, especially when:

- you want to confirm what good practice looks like
- you are unsure whether an action or decision aligns with our values and standards
- behaviour does not feel safe, fair or ethical
- a situation involves safety, wellbeing, integrity, reputational or legal considerations
- early conversations or actions have not resulted in the expected change

This Code of Conduct supports sound judgement but does not replace it.

Decision Check – Everyday Conduct in the Workplace

Before acting or making a decision in your work, particularly where a situation feels unclear, challenging or may call your conduct into question, ask yourself:

- Is this consistent with PBPL's values?
- Is it safe, physically and psychologically?
- Is it lawful and consistent with PBPL policies and standards?
- Would I be comfortable if this decision or behaviour were made public?
- Could this cause harm to a person, PBPL or our community?

If the answer to any of the above questions raises concern, pause and seek guidance before proceeding.

Everyone at PBPL is required to understand, comply with and complete all required training related to PBPL policies, procedures and standards applicable to their role. The Code of Conduct sets the overarching standard of behaviour and operates alongside all PBPL policies, procedures and standards.

Where this Code of Conduct Applies

This Code of Conduct applies to all work related activities, including when using PBPL systems, devices and technology and when representing PBPL.

It also applies to conduct outside of the workplace, including on social media, where you are identifiable as a PBPL representative, or where the behaviour could reasonably impact PBPL, its employees or its reputation.

Legal and Policy Alignment

This Code of Conduct operates alongside all applicable laws, regulations and PBPL policies. Where there is any inconsistency, legal obligations take precedence.

This includes, but is not limited to, obligations under Workplace Health and Safety, Anti-Discrimination, Privacy and Competition and Consumer Law. All employees are expected to understand and comply with the legal requirements relevant to their role.

Leadership Responsibilities under the Code of Conduct

This Code of Conduct applies to everyone at PBPL.

When you are leading others or leading a project or piece of work, additional expectations apply. This is because your behaviour has a greater impact on people, culture and outcomes.

You are acting as a leader when you:

- manage or supervise others
- lead a project or piece of work
- make or approve decisions that affect people or outcomes

This responsibility may be ongoing or temporary.

When you are acting as a leader, you are expected to:

- set a positive example through your behaviour
- act with integrity and respect, always prioritising safety, especially under pressure
- address unsafe, disrespectful, inappropriate or unethical behaviour early
- create an inclusive and psychologically safe environment where people feel respected, valued and able to contribute
- demonstrate empathy and sound judgement, considering the impact of decisions on others
- create a culture where people feel safe to speak up, challenge and raise concerns
- take responsibility for decisions and outcomes, including when things go wrong
- act on known issues, failing to do so is a breach of this Code of Conduct.

Additional responsibilities for leaders are outlined throughout this Code of Conduct and must also be followed.



"We never compromise on safety, even under pressure. We know that risk can't be eliminated, but harm can be prevented. We identify and report hazards early, control them effectively and always stop unsafe work."

Safety
Everyone Safe. Always.

Safety at PBPL includes physical and asset safety, psychological wellbeing and a workplace where people feel safe to speak up, challenge and contribute.

PBPL Commitments

PBPL provides a safe, diverse and inclusive workplace and:

- maintains effective health and safety and psychosocial risk management systems
- requires the reporting and management of hazards, near misses and incidents
- provides access to wellbeing support, including the Employee Assistance Program
- provides training to build safety capability and awareness

Expectations of Everyone

Everyone at PBPL is expected to:

- take personal responsibility for their own safety and the safety of others
- follow safety procedures, controls and reasonable directions
- be fit for work, meaning able to perform duties safely and effectively, and free from impairment, including due to injury/illness, fatigue, alcohol, drugs, medication (including prescription) or emotional distress where this may affect safety or performance in accordance with the Workplace Health Standard
- immediately speak up and positively challenge unsafe conditions, behaviours or decisions to promote safe practices
- stop work when it is unsafe to proceed
- report hazards, near misses and incidents promptly in accordance with the Incident Reporting and Investigation Standard
- treat others with dignity and respect at all times

Additional Expectations of Leaders

Leaders are expected to:

- proactively identify and manage physical and psychosocial risks, demonstrating visible and proactive safety leadership rather than solely relying on issues being raised
- intervene early when behaviours or practices create risk
- ensure appropriate escalation and reporting
- support and respond appropriately when people raise safety concerns
- model safe, respectful and responsible behaviour at all times

Failing to act on known safety or wellbeing risks is a breach of this Code of Conduct.

Watch-outs

- Shortcuts or control bypasses justified by time or delivery pressure
- Not stopping work when conditions change or risk increases
- Silence on hazards, near misses, fatigue or unsafe behaviours
- Treating fatigue, impairment or stress as a personal issue rather than a safety risk
- Assuming no incidents means work is safe
- Misusing or misrepresenting safety concerns or processes
- Assuming that poor behaviour will be addressed by someone else

Collaboration
Better Outcomes. Together.

Collaboration underpins trust, performance and strong outcomes for PBPL.

PBPL Commitments

PBPL supports collaboration by:

- encouraging constructive challenge and diverse perspectives
- promoting respectful, professional behaviour across all interactions

Expectations of Everyone

Everyone at PBPL is expected to:

- work collaboratively across teams and roles
- communicate openly, respectfully and professionally
- share information appropriately to support collective outcomes
- perform their duties reliably and within reasonable timeframes
- seek guidance or support when tasks exceed their experience, expertise or capacity to meet agreed timeframes
- represent PBPL appropriately in all interactions, including in digital and online environments
- address issues directly with the relevant person or escalate appropriately in line with the Issue Resolution Policy

Additional Expectations of Leaders

- set clear expectations for behaviour and ways of working in line with the PBPL Behaviour Framework
- address behaviour issues promptly and consistently in line with the Managing Misconduct Policy
- support constructive discussion while maintaining respectful and professional standards
- work with team members to prioritise and agree reasonable timelines for delivery of assigned tasks

Watch-outs

- tolerating disrespectful behaviour from "high performers"
- avoiding difficult conversations to preserve harmony
- allowing pressure to erode professionalism or respect
- allowing historical poor behaviours to continue unchallenged




How we work together, and how we conduct ourselves, determines what we achieve.


"If it doesn't feel right,
it isn't right."

Integrity
Right Choices. Every Time.

Integrity and ethical conduct are fundamental to trust, credibility and PBPL's reputation. Acting with integrity requires good judgement. Positive intent does not justify behaviour that is dishonest, misleading or creates risk.

PBPL Commitments

PBPL provides guidance, training and controls to support ethical decision making and to prevent fraud, corruption and misconduct.

Expectations of Everyone

Everyone at PBPL is expected to:

- act honestly, lawfully and transparently
- understand and comply with all applicable legal and regulatory obligations relevant to your role
- never engage in bribery, corruption or fraudulent conduct
- provide complete, accurate and truthful information
- use PBPL assets, systems and information responsibly and in accordance with PBPL Policies and Standards including the IT Acceptable Use Policy
- never mislead, conceal or encourage improper conduct
- respect the human rights, dignity and wellbeing of others and do not tolerate any form of exploitation, including practices that undermine fundamental human rights
- speak up immediately if you observe unethical, dishonest or unlawful behaviour
- act within approved delegations and never make commitments outside your authority
- do not engage in public or online behaviour that may harm PBPL's reputation
- not trade in securities, or encourage others to trade, while in possession of inside, confidential or pricesensitive information obtained through their role at PBPL

Improper use or disclosure of inside information may breach the Corporations Act and this Code of Conduct.

Additional Expectations of Leaders

Leaders are expected to:

- role-model integrity, ethical decision-making and compliance with applicable laws, polices and standards
- encourage the reporting of concerns and respond appropriately, even in the absence of a formal complaint in line with the Issues Resolution Policy
- ensure decisions and approvals are made by appropriately authorised individuals
- Ensure team members understand and meet relevant legal and regulatory obligations
- create an environment where people feel safe to raise issues

Failing to address known integrity and ethical concerns is a breach of this Code of Conduct.

Watch-outs

- withholding information to avoid scrutiny, difficult conversations or personal/reputational impact
- rationalising behaviour as acceptable based on positive intent
- assuming silence or lack of challenge equals agreement
- accepting "that's how it's always been done" as sufficient justification

Excellence
Better Than Yesterday.

Excellence means consistently delivering our best, learning from experience and holding ourselves accountable for outcomes and how they are achieved.

PBPL Commitments

PBPL is committed to continuous improvement and managing environmental impacts responsibly in line with its obligations.

Expectations of Everyone

Everyone at PBPL is expected to:

- take ownership of their work and behaviour and be accountable for outcomes
- deliver on the responsibilities outlined in their Position Description
- complete all mandatory training and maintain required capability for their role
- commit to high standards and continuous improvement
- act professionally and consistently
- learn from feedback, mistakes and from others
- consider environmental impacts in their work and comply with environmental requirements relevant to their role
- report environmental risks, incidents or breaches immediately

Additional Expectations of Leaders

Leaders are expected to:

- set and role-model high but achievable standards and accountability for outcomes
- address underperformance and behavioural shortfalls early
- recognise and celebrate effort, improvement and learning, not just results
- create an environment where progress and positive behaviours are actively acknowledged
- ensure environmental risks are identified and appropriately managed within their areas

Watch-outs

- ignoring small issues or early signs of underperformance or behavioural concerns
- avoiding difficult conversations about performance or behaviour
- rewarding results while overlooking how those results were achieved
- waiting for issues to escalate rather than addressing them early
- blaming others or external factors instead of taking ownership



"We take pride in our work and continuously improve."


"Everyone deserves to feel safe, valued and heard."



Inclusion
Everyone Belongs. Every Voice Counts.

Inclusion strengthens safety, performance and trust. PBPL is committed to creating a workplace where people belong and feel confident to contribute.

PBPL Commitments

PBPL:

- values diversity of background, experience and perspective
- fosters psychologically safe workplaces
- does not tolerate bullying, harassment (including sexual harassment) or discrimination of any kind as outlined in the Unacceptable Work Behaviour Policy

Expectations of Everyone

Everyone at PBPL is expected to:

- treat others with respect, kindness and fairness
- create space for diverse voices and perspectives to be heard
- speak up about exclusionary or harmful behaviour
- contribute to a psychologically safe and inclusive environment

Additional Expectations of Leaders

Leaders are expected to:

- model inclusive behaviour
- challenge and address exclusion, bias or harmful behaviour immediately, when observed, regardless of reporting line, in line with the Issue Resolution Policy
- ensure people who raise concerns are supported and not disadvantaged

Watch-outs

- tolerating inappropriate or harmful behaviour because of someone's seniority, performance or expertise
- failing to create an environment where people feel safe to contribute or speak up
- dominating discussions or shutting down alternative perspectives
- interpreting silence as agreement rather than a potential lack of safety
- making decisions or sharing information through informal channels that exclude others



Confidentiality, Privacy and Information Security

> "Information entrusted to us must be protected."

Everyone at PBPL must:

- protect personal, confidential and sensitive information
- access, use or disclose information only where there is a legitimate business need and appropriate authority, including within PBPL
- ensure confidential information is not shared casually or informally
- access information only where authorised
- secure systems, records and passwords
- comply with Privacy, Information Management and Technology policies

Conflicts of Interest
Transparency and Trust

> "Perceived conflicts matter as much as actual ones."

All conflicts of interest must be disclosed and managed to maintain trust, fairness and sound decision making.

Expectations of Everyone

Everyone at PBPL is expected to:

- promptly disclose actual, potential or perceived conflicts of interest
- disclose close personal, family, romantic or intimate relationships including de-facto partners, financial dependency or shared living arrangements, where there is a reporting, supervisory, recruitment, performance management or commercial decision making connection
- disclose these relationships to your Executive Leader or Executive General Manager Governance. Executive or Board disclosures should be made directly to the Board Chair or Executive General Manager Governance.
- seek prior approval for secondary employment or external business activities from your Executive Leader
- not accept gifts or benefits that could influence, or appear to influence, decisions, and disclose any gifts or benefits in line with the Entertainment and Gifts Policy
- act in PBPL's best interests when working with contractors, suppliers and partners, and disclose any relationships that could affect, or be seen to affect, impartial decision making
- use information responsibly and not for personal gain, including not trading or encouraging others to trade, based on confidential or pricesensitive information
- not make public statements or engage in activities, including online (eg. Linked In) or in political or community contexts, that could be perceived as representing PBPL without authorisation, or that may harm PBPL's interests or reputation

Additional Expectations of Leaders

Leaders are expected to:

Foster a culture of openness where conflicts can be safely disclosed

- Promptly review and address disclosures, including approving or escalating as required to the EGM Governance
- Identify and manage conflicts within their teams, including taking appropriate mitigation actions
- Actively assess and manage risks, including actual, potential, and perceived conflicts
- Maintain confidentiality when handling sensitive disclosures
- Monitor and review conflicts over time to ensure controls remain effective
- Escalate complex or high-risk matters to Governance, Legal, or the Board as required

Watch-outs

- being involved in decisions where you have a **personal relationship or prior connection**
- favouring a **supplier, contractor or partner** because of familiarity rather than merit
- assuming something is acceptable because it is "common practice" rather than **aligned to this Code of Conduct**

If you are unsure about a potential conflict of interest, please seek guidance from your Executive Leader, Executive General Manager Governance or Executive General Manager People. Failure to disclose a relevant conflict or relationship, regardless of intention, is a breach of this Code of Conduct.



Speaking Up and Raising Concerns

PBPL expects employees to speak up about concerns in line with the Issues Resolution Policy and will not tolerate retaliation against those who do so in good faith.

You can raise concerns:

- with your manager or another leader
- with the People Team or Whistleblowing Officer
- through PBPL's Speak Up Service (YourCall)

Concerns relating to serious misconduct, corruption or fraud may be protected under whistleblower legislation. Further information can be found in PBPL's Whistleblowing Policy.

What Happens When Standards Are Not Met

All reports and concerns are taken seriously and addressed in a confidential, fair and objective manner, in line with the Issues Resolution Policy and Managing Misconduct Policy.

Failure to comply with this Code of Conduct, including failure by leaders to act on known risks, behaviours or concerns, may result in disciplinary action, up to and including termination.

Our Collective Responsibility

Each of us plays a role in shaping PBPL's culture and upholding the standards in this Code of Conduct.

By living our values, intervening early, and holding ourselves and each other to account, we create a workplace where everyone is safe, included, trusted and able to perform at their best.

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