



Port Waratah is committed to maintaining the highest standards of ethical behaviour and professional conduct, and expects all employees to act with honesty, integrity and fairness in all business dealings. This policy outlines the behaviours expected from all employees and the principles and standards that guide interactions and decision-making processes of the business.

Port Waratah has zero tolerance for any form of unethical behaviour, including fraud, corruption, discrimination, harassment, and bullying ensuring full compliance with relevant laws and regulations. This commitment is reinforced through the Code of Conduct Procedure, the Anti-Discrimination, Anti-Harassment and Bullying Policy and Procedures, and the Corporate Fraud and Improper Conduct (Whistleblower) Policy and Procedure, which outline the mechanisms in place to achieve the policy goals.

**Port Waratah is committed to:**

- Upholding the business values and the five Drivers for Success.
- Supporting all employees in performing their duties and transactions effectively, through open and constructive communications about expected conduct and standards.
- Ensuring all communications, both internal and external, are truthful and transparent.
- Competing ethically and lawfully, ensuring employees understand the obligations to avoid conflicts of interest of Port Waratah.
- Ensuring team members declare any real or perceived conflicts of interest, including all gifts, benefits and hospitality given or received.
- Supporting all employees and stakeholders to resolve ethical issues and challenges that may arise.
- Protecting the confidentiality of company information and ensuring non-disclosure of information without proper authorisation.
- Adherence to all applicable laws and regulations and ensuring employees fully comply with all laws and regulations governing Port Waratah business activities.
- Supporting employees' rights to freedom of association and non-association.
- Monitoring compliance and taking appropriate action against contravention of this policy.
- Providing the leadership, training and coaching to ensure an understanding of the expected code of conduct and accountabilities.

At Port Waratah, every employee shares the responsibility to contribute to a fair, professional and ethical working environment. Breaches of the policy by employees may constitute misconduct or serious misconduct, and in the most serious cases may result in dismissal. For contractors and visitors, breaches may result in exclusion from Port Waratah sites.

Port Waratah expects employees to take personal responsibility to comply with this Policy, hold each other to account, and report any areas of concern to a member of the Senior Leadership Team or through the other reporting mechanisms available, as detailed in the relevant procedures.

**HENNIE DU PLOOY**  
**CHIEF EXECUTIVE OFFICER**