



# WorkPac Group Code of Business Conduct

# Table of Contents

A MESSAGE FROM THE CHAIRMAN .....	3
PART A - UNDERSTANDING AND USING THE CODE.....	4
1. Who We Are.....	4
2. About the Code.....	4
3. Who does the Code apply to?.....	4
4. Whistleblowers - “Zero Tolerance” for Retaliation.....	4
5. Business Conduct Questions and Concerns.....	5
6. Using the Code.....	5
7. What Happens if a Business Conduct Concern is Raised? .....	6
8. Breaches of the Code.....	6
PART B - YOU, OUR PEOPLE.....	7
1. Health and Safety.....	7
2. Harassment and Bullying.....	8
3. Alcohol, Drug and Tobacco Use .....	9
4. Diversity and Equality in the Workplace .....	9
5. Personal Information and Your Right to Privacy.....	10
PART C - THIRD PARTY RELATIONSHIPS .....	10
1. Conflicts of Interest.....	10
2. Accepting Gifts, Hospitality and Entertainment .....	11
3. Business Partners .....	11
4. Supplier Relationships.....	11
5. Competition .....	12
6. Trade Controls.....	12
7. Business Travel .....	12
PART D - COMMUNITIES AND GOVERNMENTS .....	13
1. Human Rights.....	13
2. Engaging with Communities.....	13
3. Political Engagement .....	13
4. Corruption.....	13

5. Working with Governments .....	13
6. Environment .....	14
<b>PART E - USING THE WORKPAC GROUP'S RESOURCES.....</b>	<b>14</b>
1. Protecting Our Assets .....	14
2. Protecting our Intellectual Property .....	14
3. Online Security .....	14
4. Accuracy of Data and Information .....	15
5. Insider Trading.....	15

## A MESSAGE FROM THE CHAIRMAN

*I am proud to be part of a team that values and upholds high ethical standards as a key measure of our success. We do not focus solely on commercial outcomes, we also focus on the way we achieve them.*

*Our successes have been built on strong foundations of performance, integrity, safety and good relationships, both within our organisation and externally. These values form the basis of our Code of Conduct (“Code”).*

*The Code sets out the manner in which the WorkPac Group and all of its group members, expect those who work for or on behalf of any WorkPac Group member to conduct themselves. This applies to every person at every level.*

*By adhering to the values set out in the Code, we all play a role in supporting and empowering each other to build strong relationships, achieve goals and have fun on the way.*



*In all of the work you do for or on behalf of a WorkPac Group member, please remember your shared responsibility to consistently apply the Code. Also, if you become aware of a breach of the Code or have any suggestions on how we can improve the way we behave, please speak up.*

*It is up to each of us to forge a future we can all be proud of.*

David Baxby  
Executive Chairman - WorkPac

# PART A - UNDERSTANDING AND USING THE CODE

## 1. Who We Are

We are the WorkPac Group.

We are an Australian group of companies that deliver a range of services in a variety of industries, including the labour hire, recruitment and human capital solutions industries. We are focused on optimising productivity and mitigating risk in the people component of our clients' businesses. We are also focused on conducting our businesses with integrity, adhering to high ethical standards and requiring those with whom we do business to do the same.

The WorkPac Group consists of WorkPac Pty Ltd ACN 111 076 012 and any parent company, subsidiaries and any subsidiary of its parent company from time to time. In this Code, we refer to the group as "the WorkPac Group" or "we", "us" or "our".

## 2. About the Code

The WorkPac Group Code of Business Conduct ("the Code") is based on our *who we are and our aspiration* and represents our commitment to ethical business practices and legal obligations. We believe that by adhering to the Code, we will build and maintain strong relationships with the communities in which we operate and with our employees, contractors, clients, business partners, suppliers and governments.

The Code guides the way we do business and how we interact with each other on a day-to-day basis. It incorporates many of the WorkPac Group's values and commitments, which are set out in our *who we are and our aspiration* and various other policies and procedures, into one practical 'go to' document.

Whilst the Code covers a large range of topics, it cannot anticipate or describe every applicable law or scenario. It is therefore important for you to apply your own common sense to the application of this document and to know where to go to obtain assistance if you have any questions or concerns about your personal circumstances.

It is also important to note that in many cases, a breach of the Code may constitute a breach of the law. For example, a breach of the code might constitute fraud, bribery or discrimination. Breaches of the Code will be treated very seriously by the WorkPac Group, irrespective of whether the breach constitutes a breach of the law and may be grounds for dismissal or legal action against the offender.

## 3. Who does the Code apply to?

The Code applies to everyone involved in our business, regardless of their location or role. This includes all employees, directors, officers and contractors. It also includes our clients and suppliers where they are under a relevant contractual obligation.

Make sure you know the rules that apply to you and your work. Ensure that you always apply them.

## 4. Whistleblowers - "Zero Tolerance" for Retaliation

The WorkPac Group strongly encourages people to report any business conduct concerns they have.

We strictly prohibit any form of punishment, disciplinary or retaliatory action being taken against anyone for raising a business conduct concern or for helping to address any such concerns. Retaliation is grounds for discipline, including dismissal or termination of contract. If you feel that someone has retaliated against you for raising a business conduct concern, you should report it immediately.

## 5. Business Conduct Questions and Concerns

If you have any questions or concerns about anything in this Code, our *who we are and our aspiration* or the way in which either of these are being applied or adhered to, we encourage you to get in touch with us.

You can do this:

- (a) In person - by speaking to your supervisor, manager or to our Industrial Relations Team;
- (b) By email - [info@workpac.com](mailto:info@workpac.com);
- (c) By mail - National ER/IR Manager, 168 Robertson St, Fortitude Valley QLD 4006; or
- (d) By website - <http://www.workpac.com/report-a-safety-incident> (name and contact details are optional).

If you are unsure whether you should speak up about something you have seen, heard or are concerned about, we recommend asking yourself the following questions:

- (i) Does it seem to conflict with this Code or our *who we are and our aspiration policy*?
- (ii) Could it in any way endanger someone or cause them injury?
- (iii) Is it illegal or in conflict with any of the WorkPac Group's policies or procedures?
- (iv) Does it offend your own personal values and beliefs?
- (v) If the issue involved one of your family members or friends, would you tell them to speak up?
- (vi) Does your 'gut feeling' tell you that you should say something?

If you answered 'yes' to any of the above questions, you should definitely speak to someone about your concerns.

You may raise concerns anonymously if you wish. However, we encourage you to identify yourself when contacting us so that we can properly investigate the issues raised and if needed, contact you again to discuss in more detail. Remember, the WorkPac Group takes a 'zero tolerance' approach to retaliation for raising business conduct concerns under this Code (see Section 4 of the Code for more details).

## 6. Using the Code

You are expected to know and understand the Code and to apply it to your work every day when dealing with or representing a member of the WorkPac Group. If you are not sure about how the Code applies to you or how to comply, please speak up. Compliance with the Code is extremely important.

EVERYONE should:

- (a) Ensure that they know and understand the Code;
- (b) Ensure that they comply with the Code, taking care not to rush to get a job done at the expense of compliance with the Code;
- (c) Take reasonable steps to ensure that others who conduct business on behalf of the WorkPac Group, such as contractors, agents, consultants and business partners, know, understand and comply with the Code;
- (d) Immediately speak up about any questions or concerns regarding the Code;
- (e) Never retaliate, nor encourage or allow retaliation, against someone for raising a concern about compliance with the Code; and
- (f) Never ignore a breach or potential breach of the Code.

THOSE OF WHO SUPERVISE OTHERS, for example as a supervisor or manager, have an additional duty of care to understand your responsibilities regarding business conduct concerns. If you supervise others, you should also:

- (a) Behave in the manner that you wish others to behave, lead by example and help people to understand the practical applications of the Code;
- (b) Foster an inclusive culture where those around you understand their responsibilities and feel comfortable to raise business conduct concerns without fear of retaliation;
- (c) Encourage and reward employees for demonstrating adherence to our *who we are and our aspiration policy*;
- (d) Ensure that our standards, policies and procedures are accessible, understood and complied with;
- (e) Apply the Code in existing processes, such as in the day-to-day working of employment, inductions, training, execution of supply contracts and industrial agreements;
- (f) Take or recommend appropriate action to address business conduct issues; and
- (g) Never ignore or dismiss a business conduct concern that is raised to you or that you become aware of.

## 7. What Happens if a Business Conduct Concern is Raised?

Breaches of the Code will be treated very seriously, respectfully and in a timely manner by the WorkPac Group. The specific course of action we take will depend on the nature and severity of the issue raised.

Employees responding to concerns raised about business conduct should:

- (a) Take action on issues raised in a prompt and professional way;
- (b) Treat all concerns raised seriously and where possible, with confidence;
- (c) Report all concerns to the Industrial Relations Team so that the issue can be properly recorded and escalated as necessary;
- (d) Provide accurate information consistent with the Code and our standards, policies and procedures;
- (e) Where necessary, seek the advice of experts who have the necessary knowledge and objectivity regarding the issue raised; and
- (f) Know where to go for further support or advice.

If you raise a concern, we may need additional information from you about which WorkPac Group business you work in, the nature of the issue raised, who is involved and what steps you have already taken to address the issue. You should provide as much information to us as possible so that we can properly address the issue. You should also be as honest and open as you can as this will assist us to provide you with a thorough and effective response.

We usually find that through the provision of advice, support and guidance, people are able to resolve business conduct issues themselves. If this is not possible or if the matter requires further investigation, referral or mediation, you will be advised on the next steps, anticipated timeframes for each step and the process for receiving any applicable feedback.

## 8. Breaches of the Code

As mentioned in Section 2 of the Code, breaches of the Code will be treated very seriously by the WorkPac Group. They may be grounds for disciplinary action, dismissal and/or legal action.

Disciplinary action may include:

- (a) Being required to attend meetings with supervisors, managers and executives regarding the breach, desired behaviors and corrective action required;
- (b) Receipt of formal warnings;
- (c) Having your employment or contract suspended; and/or
- (d) Being dismissed from your employment or having your contract terminated.

The WorkPac Group may also refer the matter to appropriate legal authorities for further action and prosecution where the conduct constitutes illegal behavior.

Given the importance of the Code, even if you don't directly breach the Code, you may also be subject to disciplinary action if you:

- (i) Fail to promptly raise any known or suspected breaches of the Code by another person;
- (ii) Fail to cooperate in investigations into possible breaches of the Code;
- (iii) Request others to breach the Code, our *who we are and our aspirations* policy or any of the WorkPac Group's policies or procedures;
- (iv) Retaliate against another person for reporting a possible breach; or
- (v) Fail to ensure that those around you or whom you supervise or manage comply with the Code, *who we are and our aspirations*, our policies and procedures or the law.

## PART B - YOU, OUR PEOPLE

### I. Health and Safety

Health and safety in our workplaces comes first.

The WorkPac Group recognises that health, safety and social responsibility are key elements to ensuring that people have a happy, safe place to work. We are therefore committed to providing our people with safe working environments and to achieving industry leading practices in health and safety.

We have a number of safety policies, procedures and systems in place to ensure that our businesses and the people in it, are operating in a safe way. In a lot of cases, our clients will also have safety policies, procedures and systems in place which must also be adhered to. If you have any questions about what your responsibilities are under these policies, procedures and systems, please speak up.

We monitor safety every day. We have health and safety targets which are reported on to our various Boards and committees and we measure our performance against these targets. Your wellbeing is our goal in all areas and at all levels of our businesses.

Although we make every effort to ensure your safety, it is up to you to ensure that you are aware of your obligations and that you comply with them. This is critical to ensuring your wellbeing and the wellbeing of those around you. You should therefore make sure you know your obligations, share your safety knowledge and immediately report any safety or health concerns you have.

A safe and secure work environment also means a workplace free from violence. Threats (whether implicit or explicit), intimidation and violence have no place in any WorkPac Group business, workplace or operation. This kind of behavior will not be tolerated and will be grounds for disciplinary action, including dismissal and may constitute a crime. In such cases, we may refer the conduct to appropriate law enforcement authorities for further action.



#### NEVER:

- (a) Let the desire to get the job done quickly affect decisions which affect your health and safety or the health and safety of those around you;
- (b) Undertake work unless you are sufficiently rested and alert and are trained, competent and medically fit to do so;
- (c) Undertake work when you may be under the influence of alcohol or any drug (whether illegal or legal, for example, a prescribed drug);
- (d) Use threats, intimidation, harassment, bullying or violence at work or at any work function or activity and never tolerate this kind of behavior around you;
- (e) Bring weapons onto any WorkPac Group premises or any of their clients' or customers' premises, unless you are lawfully authorised to do so and you have first obtained our written consent; and
- (f) Decide not to report a risk or concern on the basis that you think someone else will raise it.

#### ALWAYS:

- (a) Inform yourself and comply with our health and safety policies, procedures and requirements and any applicable policies, procedures and requirements of our clients and customers where you carry out any work on their premises;
- (b) Assist others to comply with all applicable health and safety policies, procedures and requirements;
- (c) Look for, assess and take steps to control health and safety hazards associated with your work;
- (d) Immediately stop and report any work that you think is unsafe, even where others might think there is little or no risk;
- (e) Immediately report any accidents, injuries, illnesses, unsafe or unhealthy conditions, incidents, spills or releases of material to the environment to your supervisor or manager (both from the WorkPac Group and any applicable client or customer) so that appropriate action can be taken;
- (f) Use all appropriate personal protective equipment required for the task you are performing and take reasonable action to ensure that those around you do the same;
- (g) Make sure you know what to do in the case of an emergency and that any visitors are familiar with emergency procedures; and
- (h) Give proper consideration to all complaints or warnings made to you about health, safety and wellbeing in the workplace or at any work related event or activity.

## 2. Harassment and Bullying

The WorkPac Group will not tolerate harassment or bullying in any of our workplaces.

Harassment includes any behavior that is viewed as unwelcome, intimidating, humiliating or offensive by the recipient. Even if the behaviour is not intended to be any of these things, the behaviour is likely to constitute harassment if the recipient reasonably perceives them this way.

Bullying is repeated, verbal, physical, social or psychological abuse by a person or a group of persons in a workplace. Bullying can occur in varying degrees and over long or short periods.

You must never engage in any harassment or bullying behaviour in any of our workplaces or in any of our client's or customer's workplaces. You are instead expected to be supportive of those you work with. Be collaborative and inclusive.

In Australia and other jurisdictions in which we operate, harassment and bullying are illegal. If you witness any such behavior you should immediately report it so that we can take appropriate action.

You should remember though that reasonable management action, including constructive feedback, guidance and appropriate disciplinary action is not harassment or bullying. Reasonable management action is a necessary part of all workplaces and we actively encourage this across WorkPac Group.

### 3. Alcohol, Drug and Tobacco Use

To ensure that our primary goal of keeping our workplaces as healthy and safe as possible, the WorkPac Group requires all of its workplaces and any of our client's or customer's workplaces to be free from the use of alcohol and illegal drug use and from the misuse of other substances (even if they are legal substances).

It is critical to everyone's health and safety that everyone in the workplace is fully functional and that their performance is not affected by alcohol or any illegal or legal drugs.

If you think you are affected by any alcohol, illegal or legal substance, you must notify us prior to undertaking any work. This is critical to your wellbeing and the wellbeing of those around you. A failure to do so will be grounds for dismissal or termination.

Alcohol is not to be offered or consumed by any of our employees, contractors or visitors in any of our workplaces or any of our client's or customer's workplaces without our prior approval.

Cigarettes, e-cigarettes and other smoking apparatus are prohibited in and within close proximity to any of our workplaces. If smoking is permitted in certain areas around our workplaces, or our client's or customer's workplaces, you will be appropriately advised and you must comply with any rules relating to those areas.

The use and possession of illegal drugs at any of our workplaces, or the workplaces of any of our clients or customers, or at any related event or activity, is strictly prohibited.

All employees, contractors and visitors to our workplaces and those of our clients and customers may be subject to drug and alcohol testing. A refusal to undergo testing may result in your employment or contract being terminated. This may be due to our policies or those of our client or customer.

If you have a drug or alcohol dependency, you are obliged to notify us, to seek appropriate help and to undertake appropriate rehabilitation treatment. This is the case even if you don't think that it will affect your work.

### 4. Diversity and Equality in the Workplace

Australia and each of the places in which we operate businesses are incredibly diverse. The WorkPac Group is committed to maintaining and developing that diversity in its workplaces so that all of our employees are treated in an inclusive, fair and respectful manner. We consider this to be the best way to get the best from our people and for us, together, to achieve our business goals.

Our decisions on employment, training, career development and advancement are based on the merit of the individuals involved. We look to a person's skills, qualifications, fitness for work and capabilities. We never make decisions based on irrelevant or unlawful factors such as gender, sexuality, family responsibilities or race.

In some areas where we operate businesses, we have legal obligations to undertake initiatives which are designed to assist redress social issues of inequality, whether in race or gender and to equalise any employment imbalances. For example, in some States and Territories in Australia, the WorkPac Group operates under gender equality legislation and programs designed to assist Indigenous Australians.

EVERYONE across WorkPac Group, including you, has a responsibility to ensure that they:

- (a) Behave in a manner which is fair, respectful and which is not discriminatory - remember, it is critical to think about how you make those around you feel and not just what you intend ("I was just joking" is never an excuse);
- (b) Know what is expected of you in your role;
- (c) Are supported and encouraged to develop your work-related skills and capabilities; and

- (d) Have constructive, open discussions regarding performance in our businesses.

## 5. Personal Information and Your Right to Privacy

The people in our businesses and their trust, are core to the WorkPac Group. It is for that reason that we are committed to protecting your privacy and any information you provide to us.

The WorkPac Group collects, stores, uses and discloses personal information in accordance with applicable privacy laws and our *Privacy Policy*.

We only collect personal information related to our interactions with you and which are relevant to our businesses. We only use personal information in ways which are consistent with the purpose for which the information was provided, except as permitted by law.

To the extent that we are permitted by law, the WorkPac Group may monitor and audit the access and use of and may access information stored in, its information systems, electronic communications, devices and equipment for maintenance, business needs and legal requirements.

## PART C - THIRD PARTY RELATIONSHIPS

### I. Conflicts of Interest

It is important to the WorkPac Group to ensure that the relationships and associations our people have do not create or appear to create conflicts with the interests of the WorkPac Group.

A conflict of interest arises where a person's position within one of our businesses, or their financial or other personal considerations or interests affect, have the potential to affect or appear to affect their decision-making process, objectivity, judgment or independence.

Whilst we respect a person's choices and privacy, conflicts of interests can be very damaging to our business. When working with or for us, you should never do anything that compromises the quality of the work you do for us, your commitment to your work or your ability to make proper, impartial decisions in your role.

You should ALWAYS:

- (i) Conduct business relationships in an impartial, competitive and professional manner;
- (ii) Avoid activities, personal relationships and business dealings which cause, may cause or give the appearance of a conflict of interest with your relationship with any WorkPac Group member;
- (iii) Advise your WorkPac Group supervisor or manager in writing of any outside activities, relationships or financial interests which do or may give rise to a conflict with a WorkPac Group member's interests or which you are not sure about; and
- (iv) Excuse yourself from any decision-making process where your own interests influence, or may appear to influence, your objectivity or ability to fulfill your responsibilities to the WorkPac Group.

You should NEVER:

- (i) Hold investments or positions (directly or indirectly) in our competitors, customers, clients or parties with whom we deal in our business without our knowledge and consent;
- (ii) Hire or promote a relative or someone you are in a relationship with without our approval;
- (iii) Offer, request or accept personal gifts, whether in the form of money, services, property or other benefits from anyone with whom we are in a tender or bidding process;
- (iv) Use our property, equipment, systems or other resources or any position of influence you may be in to assist you in any activity which is external to your involvement with the WorkPac Group;

- (v) Do things in an attempt to obtain some personal gain for you, your friends or your family, such as awarding, pursuing or maintaining WorkPac Group business opportunities with any of our business partners in which you own shares;
- (vi) Do anything that might jeopardise the results of any tenders or bids we participate in; or
- (vii) Engage in work or affiliations outside your role with us without our knowledge and consent.

We will review any conflict or potential conflict carefully and work with you with a view to determining the best course of action for both parties.

A failure to disclose any conflicts of interest or a potential conflict of interest will be treated seriously and will be grounds for disciplinary action, including potentially dismissal and termination.

## 2. Accepting Gifts, Hospitality and Entertainment

The WorkPac Group prides itself on winning and undertaking business based on merit, including its proven track record of excellence. Accepting gifts, hospitality and entertainment can affect this so it is critical that in doing so, we always comply with the law and local business practices.

The WorkPac Group understands that accepting gifts, hospitality and entertainment can be a legitimate way to help build good relationships with those with whom we do business. However, it is critical to our credibility and our compliance with the law that they are never used to unfairly influence any decisions we make in our businesses (or create a perception that unfair influence is taking place).

The WorkPac Group therefore requires that gifts, hospitality and entertainment only be ACCEPTED if they are of modest value, occasional and are not provided during or in relation to any tender or bidding process in which we are involved. You should take extreme care when considering whether something is of modest value or occasional. If you are unsure, ask your WorkPac Group manager or supervisor.

You should never REQUEST any gifts, hospitality or entertainment.

GIVING gifts, hospitality or entertainment is covered in Section 4 of the Code regarding Corruption.

## 3. Business Partners

The WorkPac Group has many business partners that assist us in our various businesses. The term 'business partners' can be used to describe a wide range of third parties who interact with others on a WorkPac Group member's behalf, including our agents, advisers, consultants, representatives, travel agents, freight providers, intermediaries, tax advisers, lawyers, accountants and auditors.

The conduct of our business partners can impact on our relationships with third parties, each other and the WorkPac Group's reputation. It may also expose us to risk, including civil or criminal liabilities or penalties.

When selecting a business partner, you must therefore always exercise care and encourage them to comply with our policies and standards. Only reputable, qualified and competent business partners should be engaged. Their performance should always be fairly monitored and assessed. You should also carefully check invoices and raise queries regarding any unclear or excessive charges.

## 4. Supplier Relationships

The WorkPac Group has relationships with many suppliers and all of these relationships play a valuable part in allowing us to achieve our business goals. Our aim is therefore to have efficient processes in place with our suppliers and for our suppliers to conduct themselves to a standard that reflects the standards that we operate under.

We are committed to having fair processes in place for procuring suppliers whereby potential suppliers are made fully aware of our needs, standards and other applicable requirements.

ALWAYS:

- (a) Seek competitive bids from existing suppliers and proposed suppliers;
- (b) Base procurement decisions on best value, taking into consideration price, quality, performance, history and suitability to our standards; and
- (c) Help suppliers understand our business conduct requirements, including making the Code available to suppliers to ensure that they know who we are and our aspirations policy.

NEVER:

- (d) Engage suppliers who supply unsafe, illegal or environmentally irresponsible products or services, breach laws or regulations, use any form of abuse, child or forced labour; or
- (e) Give a supplier's confidential business information to another supplier or proposed supplier (directly or indirectly) without the first supplier's consent. This might include pricing or winning tender information.

## 5. Competition

The WorkPac Group operates in jurisdictions which usually have special rules and laws regarding competition. These are sometimes known as antitrust or anti-monopoly laws. These laws are designed to protect competition in local areas by restraining certain types of activities which lessen competition in the market. These activities include bid rigging and price fixing.

The WorkPac Group is committed to complying with all applicable competition laws in each place in which we operate a business. In doing so, we will cooperate with competition authorities, actively engage in relevant competition issues and enforce anticompetitive laws against parties who act in an anti-competitive manner toward a WorkPac Group member.

It is essential that you do not engage in any anti-competitive manner when dealing with our clients, customers, business partners and suppliers. Such conduct will be grounds for disciplinary action, including dismissal or termination of contract. You should also speak up if you suspect any anti-competitive is being taken by any person in our business or against us.

## 6. Trade Controls

The WorkPac Group complies with all applicable local, national and international rules, laws and regulations regarding the international trade of goods, services, intellectual property and other commodities. We require all persons involved in our businesses to do the same.

## 7. Business Travel

Travel is an unavoidable requirement in many roles within our various businesses. It is therefore very important to us that our business travel policies and procedures are followed at all times to ensure that travel is undertaken at a reasonable price and with a reasonable level of service and comfort which protects the health and safety of our people.

To ensure our objectives are met, all bookings for business travel should be made through the WorkPac Group's contracted travel provider. You should refer to our *Travel & Accommodation Policy and Procedure* for full details in this regard.

## PART D - COMMUNITIES AND GOVERNMENTS

### 1. Human Rights

We seek to build mutually beneficial relationships with our employees, clients, customers, business partners and the communities in which we operate. We always respect and seek to preserve the various human rights that each of us has as individuals in the conduct of our businesses.

### 2. Engaging with Communities

The WorkPac Group understands that its businesses can impact on communities. That impact might be directly through our activities or indirectly as a result of relationships we have with third parties.

The WorkPac Group is focused on giving back to the communities in which we operate our businesses. To this end, we make specific provision in our budgets to enable our permanent staff members to make investments back into local communities each year.

We encourage our people to engage with the communities in which we operate and seek to understand the social, cultural, environmental and economic implications of our business operations so that we can develop solutions which support the needs of affected people and our values.

### 3. Political Engagement

From time to time, we may express views on certain governments and decisions they make which affect our operations. In such case however, we will do this in a respectful, ethical and legal way.

We respect the rights of our people to participate as individuals in political processes. However, when engaging in such activities, you must ensure that it is made very clear that your involvement in such activities is not in any way related to the WorkPac Group and that you are not representing the WorkPac Group.

You must also ensure that your involvement does not impact on your ability to perform your obligations to us without our prior written consent.

### 4. Corruption

The WorkPac Group strictly prohibits all forms of corruption and corruptive practices in its operations.

Corruption can be broadly described as deliberate or intentional wrongdoing, or dishonest or fraudulent conduct, to elicit a specific result. This might include bribery, misuse of position or the dishonest exercise of official functions.

Any conduct which constitutes corruption will be grounds for dismissal or termination.

### 5. Working with Governments

The WorkPac Group aims to maintain good, honest relationships with all government agencies, departments, officials and personnel in all jurisdictions in which our businesses operate.

We respect the authority of these governmental bodies. Our ability to operate our businesses in the most efficient and beneficial manner is directly impacted on by government decision-making. It is therefore critical for us to have a good working relationship with these bodies.

When dealing with any government body on behalf of the WorkPac Group, you must ensure that you only provide accurate information and information that is appropriate for the purpose. A failure to comply with this may be a breach of the law and can seriously damage the WorkPac Group's reputation. You must ensure that in all cases, you comply with all applicable laws and regulations when dealing with government bodies on our behalf.

## 6. Environment

The WorkPac Group is committed to protecting, preserving and minimising the impact we have on the environments in which we work. We encourage our people to participate in programs designed to benefit the environment and to avoid practices which pose a threat to them.

# PART E - USING THE WORKPAC GROUP'S RESOURCES

## 1. Protecting Our Assets

The WorkPac Group has many types of assets which are made available to its people. These include premises, equipment, information technology, inventory, funds, intellectual property, confidential information and data which may be commercially sensitive.

You must ensure that any commercially sensitive or proprietary information is protected from unauthorised use or disclosure. Examples of this type of property include business plans, marketing strategies, operational information and data, research, technical data and designs. You must not share any of this kind of information unless authorised to do so. If you are not sure what you can share, ask your WorkPac Group supervisor or manager.

You should only ever use, or allow to be used, WorkPac Group assets for the purpose and in the manner intended, with all appropriate and accurate records kept. You should also take appropriate action to ensure that our assets are not stolen, misappropriated, damaged or misused. This includes using reasonable endeavours to prevent physical assets from being damaged, destroyed, sold, disposed of, loaned to external parties or donated without our approval.

## 2. Protecting our Intellectual Property

The WorkPac Group has developed and uses a large amount of intellectual property in its businesses. Such information is often highly valuable to us. For example, our trademarks, manuals, policies and procedures, inventions, designs, other commercially valuable expressions of ideas and confidential information.

We need all people involved in our businesses to protect and preserve our intellectual property from misuse by internal and external parties. Not only may misuse of our intellectual property cause us losses and damage, our intellectual property may also be protected by law so misuse of it may be illegal. Any misuse of our intellectual property will be treated very seriously and may be grounds for dismissal or termination.

We also require all of our people to ensure that they do not misuse the intellectual property belonging to other parties.

## 3. Online Security

With so much business activity being undertaken online and through electronic and digital mediums, the WorkPac Group is committed to ensuring the personal and corporate security of our information systems and data.

The safeguarding of our systems and data is the responsibility of everyone who works in our businesses. You are therefore required to use any technology we provide to you to undertake work in a secure and responsible manner. You are also responsible for ensuring that you understand your obligations in this regard so make sure you ask if you are unsure of what your obligations are. We can provide you with our policies and procedures relating to online and cyber security.

Any inappropriate use of any WorkPac Group information technology or data and any access or storage of inappropriate materials on or in our systems will be treated seriously. This may result in disciplinary action being taken, including dismissal, termination and civil and/or criminal authorities may be notified.

We reserve the right to access, review and disclose data stored on our systems for the purposes of maintenance, business needs or to meet legal or policy requirements.

## 4. Accuracy of Data and Information

In order for the WorkPac Group's businesses to operate effectively and for us to comply with our legal and reporting obligations, it is essential that all data and information created and stored in our records and systems is accurate. This includes information and data relating to financial matters, personnel, customers and clients, operations, projects, resources, health and safety, legal matters, the environment, time keeping and other information in any format.

You are required to comply with all applicable reporting, financial and regulatory requirements, laws and regulations in each jurisdiction in which we operate. You are also required to comply with the WorkPac Group's policies and procedures regarding accuracy and appropriateness of data, information and their storage.

Data must be appropriately recorded to properly reflect the underlying transactions they relate to. This includes properly storing source documents, whose validity and accuracy have been verified, authorised and legibly recorded. This applies to all contracts, purchase orders, documents received from third parties, taxation documents, audit information, invoices, expense records and other business information.

Once recorded, data must be appropriately maintained, protected and destroyed in accordance with applicable laws, regulations and WorkPac Group policies and procedures. Ensure that you ask us if you have any questions about what is required.

## 5. Insider Trading

Disclosing or using inside information for your benefit or the benefit of a third party is generally illegal in the jurisdictions in which we operate our businesses. In Australia, for example, it is an offence to trade using inside information, or to communicate inside information to others who will, or are likely to, trade on the inside information.

Inside information can be described as material information about a company which is not generally available to the public. Material information includes information of type which would affect a reasonable investor's decision regarding an investment in the company. For example, details of significant contracts, financial performance of the company and mergers or acquisitions involving the company.

The WorkPac Group strictly prohibits all people involved in its business from engaging in any form of insider trading regarding any WorkPac Group member and any other entity with whom we do any form of business. This applies to directors, senior management, employees, contractors, customers, clients, family, friends and investment advisors of any WorkPac Group entity. Any insider trading will be treated very seriously by the WorkPac Group and will be grounds for disciplinary action, including dismissal, termination and referral to appropriate legal authorities.